



CHEMTrust

Protecting humans and wildlife
from harmful chemicals

Dr Bjorn Hansen
Executive Director
ECHA
Helsinki, Finland

27th March 2018

Meeting request concerning grouping of chemicals, in particular bisphenols

Dear Dr Hansen,

Today CHEM Trust publishes a new report, "*From BPA to BPZ: a toxic soup? How companies switch from a known hazardous chemical to one with similar properties, and how regulators could stop them*" (see www.chemtrust.org/toxicsoup). This report examines the properties and regulation of the bisphenols group of chemicals.

The report finds that there are a large number of bisphenol chemicals in use that appear to have similar hazards to BPA, yet ECHA and other regulators are not acting to control the use of these chemicals.

We note that ECHA is undertaking work on BPS, but we would argue that this chemical should be subject to regulatory controls in the meantime.

We would also argue that the rest of the bisphenols should be subject to similar controls, unless there is clear evidence that they do not have properties similar to BPA. Would this not be a protective way to implement 'no data, no market'?

Our research for this report has also established that most of the companies who have notified their Classification and Labelling for BPS are claiming that it has no hazards. This seems surprising given that RAC has stated that BPS "*is suspected to have many of the same adverse health effects as BPA*". What mechanisms does ECHA have to ensure that these CLP entries are both up-to-date and a reasonable reflection of available data?

We would appreciate a meeting in person to discuss these issues and their potential solutions with you,

Yours sincerely,

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