



CHEMTrust

Protecting humans and wildlife
from harmful chemicals

Commissioner Vytenis Andriukaitis
European Commission
Directorate General for Health and Food Safety
B - 1049 Brussels
Belgium

27th March 2018

Meeting request concerning the revision of the EU's laws on chemicals in food contact materials, and the specific issue of grouping of bisphenols

Dear Commissioner Andriukaitis,

During our meeting in July 2017 we discussed our 'No Brainer' report, looking at the impacts of certain chemicals on neurodevelopment. Today CHEM Trust publishes a follow-up 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 most well-known example of this group is bisphenol A (BPA), but the report examines the research on a large number of other bisphenol chemicals in use that appear to have similar hazards to BPA.

The report concludes that the EU's chemical regulators – both ECHA and EFSA – are not currently dealing adequately with this group of chemicals. In the case of BPS, there is at least some re-assessment work happening at ECHA; we are not aware of anything equivalent at EFSA.

EFSA is currently re-examining the toxicity of BPA, but as far as we are aware this review does not examine BPS or other bisphenols. This seems surprising given that the European Chemical Agency's Risk Assessment Committee has stated that BPS "*is suspected to have many of the same adverse health effects as BPA*". We would urge your Directorate General to request that EFSA assess other bisphenols as part of this review.

We have already discussed with you our concerns with the substantial deficiencies in the EU's legislation on chemicals in Food Contact Materials (FCM), and our new report identifies more gaps in this legislation.

Trustees

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On the wider evaluation of the EU's laws on chemicals in FCM, we submitted our comments to the Road Map for the FCM evaluation in December 2017¹. We have not yet had any more information from your Directorate General as to the actual evaluation, for example the stakeholder consultation and event. It would be useful to know when these are planned.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Warhurst', written in a cursive style.

Dr Michael Warhurst
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www.chemtrust.org

¹ <http://www.chemtrust.org/wp-content/uploads/chemtrust-fcmroadmapcomments-dec17.pdf>