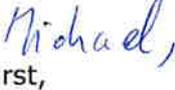


Dr Michael Warhurst
Executive Director
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By email only: michael.warhurst@chemtrust.org

Meeting request concerning grouping of chemicals, in particular bisphenols

Dear Dr Warhurst, 

Thank you for your letter of 27 March 2018 and your 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*" to Bjorn Hansen. He asked me to reply.

Your report is very timely as ECHA is continuing to monitor the trend towards substitution of BPA with BPS or other substances in thermal paper, based on the request of the Commission. This is a follow-up activity of the adopted restriction that was originally prepared by France. The first full report for 2014-16 was published on our website and we will issue an update soon to take into account the developments in 2017¹. Should a need for a restriction arise, a Member State, or ECHA if requested by the Commission, can prepare a restriction.

Several other actions are currently ongoing on bisphenols. For example, the Belgian Competent Authority is currently carrying out a substance evaluation on BPS and is waiting for test data from the registrants, due by 20 September 2018, as per ECHA's Member State Committee's request. The substance evaluation will go some way to demonstrating the hazard profile of BPS and if further regulatory action is required. The applicability of this information to the other Bisphenols will also need to be determined.

BPA has a harmonised classification and labelling (CLH) for reproductive toxicity, as a substance that may damage fertility (Repr. 1B; H360F). This classification has direct consequences for its uses, in particular the obligation to introduce risk management measures for the professional uses of BPA and the prohibition of placing on the market substances and mixtures containing more than 0.3% BPA for consumer use. Furthermore, BPA has been identified as SVHC for reproductive toxicity and for its endocrine disrupting properties in humans and the environment.

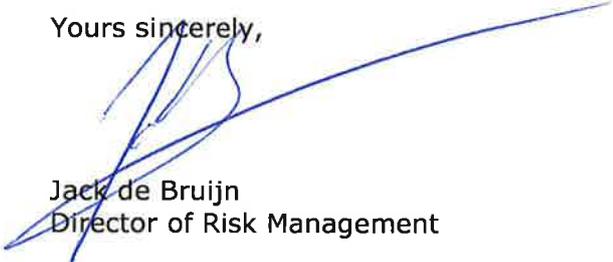
Regarding how the harmonised entries in Annex VI to the CLP Regulation sets out the procedure for update, the starting point is always a proposal from a Member State or industry. In the case of BPS, a CLH proposal may be an outcome of the substance evaluation at the discretion of the Belgian Competent authority.

¹ See <https://echa.europa.eu/hot-topics/bisphenol-a>

We would very much appreciate the opportunity to meet and discuss your report and the questions you raised in your letter. As already discussed, we could meet either on 18 April or 13 June 2018.

Our co-ordinator of restrictions, Mr Mark Blainey (mark.blainey@echa.europa.eu, tel. +358-9-6861-8122) will contact you soon.

Yours sincerely,



Jack de Bruijn
Director of Risk Management