

**Recommendations following the inclusion of BPA in Annex III of the RoHS recast**

PC/BPA Group Views on the European Parliament Environment Committee report on the use of certain hazardous substances in electrical and electronic equipment (RoHS)

**The PC/BPA Group of PlasticsEurope calls on European legislators:**

- **To reject Amendment 87 of the European Parliament Environment Committee report that seeks to create an expanded list of new Annex III substances for future review under RoHS,**
- **To reject the inclusion of Bisphenol A (BPA) within the Annex III list, a substance which has already been assessed and proven to be of no concern to either human health or the environment by the respective European competent authorities,**
- **To support a return to the original Commission proposal regarding Annex III,**
- **To ensure that any further provisions related to the evaluation and restriction of additional hazardous substances in the waste stream of EEE are consistent with the existing provisions of REACH.**

**The inclusion of BPA in Annex III is without any scientific basis**

- The European Parliament Environment Committee has provided no scientific justification for the inclusion of BPA in the Annex III list included in its report on the RoHS recast.
- The EU Risk Assessment on BPA, arguably one of the most rigorous examinations of a substance's safety in the world today and based on the best available scientific evidence concluded that BPA, and thus BPA-based materials, pose no risk to consumers or to the environment from electrical and electronic equipment (EEE).
- Furthermore, the study commissioned by the European Commission for the development phase of the RoHS proposal in 2008 (*Öko-Institut, "Study on hazardous substances in Electrical and Electronic Equipment, Not Regulated by the RoHS Directive", 17 October 2008*) concluded that the use of BPA in EEE does not pose a high risk to human health and to the environment and that "no action is required" for BPA in the context of the RoHS recast.

**The inclusion of BPA in Annex III could result in the use of less well-assessed substances and the stifling of European innovation**

- BPA has been safely-used in countless EEE for decades and is the chemical starting point or "intermediate" for the manufacture of polycarbonate plastic and epoxy resins. These materials are used to make a large variety of electric and electronic products that are important to our quality of life including CDs, DVDs, housings for computers, cell

phones, cameras and TVs. In more than 80% of applications, polycarbonate is critical to the performance of the component or material, and thus makes it unique for its respective uses. This applies to both the converting and manufacturing industry, and also to the functional performance of the actual end product.

- Furthermore, and depending on the application, polycarbonate waste from EEE is readily reused, recycled or recovered. When recycled or incinerated, neither polycarbonate nor epoxy resins produce BPA that can be of danger to human health or the environment.
- The inclusion of BPA in Annex III sends a signal to the market to de-select BPA on the basis of a presumed guilt, despite the no risk conclusions of the BPA risk assessment. With no justification for including BPA on Annex III, markets may move away from this risk-assessed substance to alternative substances where scientific analysis is less robust and the risks are less well-characterised.

### Conclusion

- The inclusion of BPA in Annex III would undoubtedly serve to blacklist this substance, creating unfounded damage to European BPA manufacturers who are committed to ensuring that their products meet the highest levels of safety.
- Moreover, it creates business uncertainty for the manufacturers using BPA-based materials in their EEE products, who rely on long-term production choices and strategies.

The PC/BPA Group of PlasticsEurope fully supports the broader views on RoHS adopted by the European Chemical Industry Council (Cefic) and PlasticsEurope.

The PC/BPA Group of PlasticsEurope represents the European producers of BPA, the intermediate used in the manufacture of polycarbonate plastic and epoxy resins.

*For more information:*

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