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Bisphenol A (BPA) included in Candidate List due to its identification as Substance of Very High Concern (SVHC)

As of January 12, 2017 Bisphenol A (BPA) is now included in the Candidate List of substances of very high concern for Authorisation by ECHA. This is a consequence of the recent Member State Committee agreement to identify BPA as a Substance of Very High Concern (SVHC) under REACH (European Regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals), based on its harmonised classification as reprotox 1B.

As the harmonised classification of BPA as reprotoxic 1B fulfils the criteria for identification as SVHC according to article 57(c) of REACH, this development was expected. The justification for SVHC identification is based on intrinsic properties of the substance, not on use, exposure and risk.

No direct implications of SVHC identification and/or potential later authorisation expected for vast majority of BPA-applications

Generally, the identification of BPA as SVHC and the inclusion in the Candidate List triggers immediate communication and notification obligations for companies under certain conditions. However, the overwhelming amount of all BPA produced is converted into polymers. Only technically unavoidable trace levels of unreacted BPA may remain in the polymer matrix, which are usually far below the levels that would trigger SVHC-related communication or notification obligations. Thus, for the vast majority of BPA applications, no direct obligations by the SVHC identification are expected. More detailed information about respective obligations can be found here: <https://www.echa.europa.eu/candidate-list-obligations>.

The SVHC-identification does not imply an immediate ban or restriction of any uses of the substance, but it could be the first step into its Authorisation under REACH.

Intermediate uses of a substance are exempt from Authorisation under REACH

BPA is predominantly used as an intermediate to manufacture polycarbonate and epoxy resin, which are mainly polymeric materials. Intermediate uses are exempt from potential later authorisation under REACH. Therefore, no direct impact of a potential authorisation would be expected for polymeric uses of BPA.

Consumer safety of BPA confirmed for food contact applications and beyond

In its recent comprehensive evaluation of consumer safety, the European Food Safety Authority (EFSA) concluded that current consumer exposure to BPA poses no health risk to any age group. This is because the exposure via food, but also via a combination of different sources (food, dust, cosmetics, thermal paper) is far below the newly derived tolerable daily intake (TDI).

REACH respects existing food contact regulation

In the area of food contact applications, the use of BPA is in compliance with the Framework Regulation for all food contact materials ((EC) No 1935/2004) and permitted by the Regulation on plastics used as food contact materials ((EU) No 10/2011). Therefore, neither the identification of BPA as an SVHC nor a potential subsequent authorisation under REACH at a later stage would affect its approved use as a monomer to manufacture plastics for food contact applications such as polycarbonate.

For further information please contact:

Jasmin Bird

PC/BPA-Group PlasticsEurope

jasmin.bird@plasticseurope.org

www.bisphenol-a-europe.org

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