

Statement R.E. the report and press release published by Umweltbundesamt (UBA) on 9 June 2010 entitled "Bisphenol A – a chemical with adverse effects produced in large quantities"

UBA recommendation contradicts independent European authorities who confirm that BPA-based materials can be safely used

The European producers of polycarbonate and Bisphenol A (BPA) are greatly concerned that the UBA publication on BPA of 9 June 2010 is in direct contradiction to the conclusions of the extensive BPA risk assessments carried out by both German and European authorities. These assessments have consistently concluded that there is no risk for humans or the environment from the use of existing BPA-based applications. Despite this, UBA has recommended producers and users of BPA *"to use alternative substances already at this state of knowledge for reasons of precaution."*

The PC/BPA Group of PlasticsEurope underlines that:

- ❖ **The UBA recommendation constitutes a misuse of the precautionary principle.** The UBA has correctly reported that leading international and national authorities regard the use of BPA-based materials as safe. The UBA reference to precautionary measures is a misinterpretation of the underlying reasoning behind this concept. The precautionary principle should only be applied if the insecurities in the assessment of a risk are large, for example, when scientific data is either unavailable or insufficient. However, BPA has an extensive scientific data base available, and experts can assess any risk associated with BPA comparably well. On the basis of this wealth of scientific analysis, experts have concluded that there is no need for further measures for BPA beyond those already in place.
- ❖ **The UBA recommendation would replace a well characterised risk with an unpredictable risk.** Providing the necessary scientific data to enable a comprehensive understanding of all relevant aspects of a chemical substance is one of the basic pillars in European safety assessment. This principle must also be applicable to all alternative substances and materials. The UBA do not appear to have investigated the availability of alternatives. Specifically there is no evidence provided that the UBA have meticulously examined the data base and safety of potential alternatives to BPA. On this point, the Swiss health authority Bundesamt für Gesundheit has noted explicitly: *"A ban on BPA would inevitably cause manufacturers of packaging and consumer products (food contact materials) to have to switch to other substances, the toxicity of which is less well known. This would mean a well characterised risk would be replaced with a conspicuously unpredictable risk."*
- ❖ **The UBA recommendation ignores the fact that BPA-based materials contribute substantially to sustainable development.** The use of BPA-based materials, such as polycarbonate and epoxy resin, is often driven by their outstanding sustainability qualities. These products contribute substantially to the environmentally friendly production and the

sustainable use of many applications. For example, it would be difficult for Germany to achieve its ambitious climate protection goals without wind energy from epoxy-based windmills, or without solar energy from solar-panels using BPA-based materials. Furthermore, it will be challenging for UBA to support innovation and progress in the electrical and electronics business without using the excellent technical properties of polycarbonate compounds and epoxy resins in electronic equipment.

The safety of its products is of utmost importance to plastics producers. However, the UBA recommendation creates unnecessary anxiety for both the public and downstream users of BPA-based materials. It damages the credibility of both the existing regulatory assessment process as well as the authorities that have led this process, by requesting the substitution of a safe material without any sound scientific justification. On the basis of these considerations, the PC/BPA Group of PlasticsEurope stresses that calls for the substitution of BPA by UBA are therefore unjustified and should be rejected.

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