

Bisphenol A (BPA) identified as Substance of Very High Concern (SVHC) – inclusion in Candidate List announced for January 2017

The members of the PC/BPA group note 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. ECHA announced the inclusion of BPA in the Candidate List for January 2017.

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

The identification of BPA as SVHC and the inclusion in the Candidate List triggers immediate communication and documentation obligations for companies under certain conditions. The overwhelming amount of all BPA produced is converted into polymers and only technically unavoidable trace levels of unreacted BPA may remain in the polymer matrix, usually far below the levels that would trigger SVHC-related communication or documentation obligations. More detailed information 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. The uses of BPA to manufacture polymers would be exempt from potential later authorisation under REACH. No direct impact of a potential authorisation would therefore 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 in plastics for food contact applications such as polycarbonate.

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