

## ZPS Comments to COM consultation on Food safety – restrictions on bisphenol A (BPA) and other bisphenols in food contact materials

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**Zveza potrošnikov Slovenije**, ZPS (Slovene Consumers` Association) is a non-governmental organization promoting strict restriction of harmful endocrine-disrupting substances and generally advocating for toxics-free materials and products for over 30 years now.

We welcome the proposal for revising the Packaging and Packaging Waste Regulation that includes the ban on Bisphenol A. We also appreciate the provisions to ban other bisphenols to prevent regrettable substitution. As an organization working with consumers and responding regularly to their concerns about hazardous substances in food, packaging, and consumer products, we are often faced with disappointment that food packaging contains several unregulated substances that leach into the food, water, and environment. In several surveys conducted independently or as part of Life-funded projects, consumer organizations many times voiced their demand to ban these substances immediately. They are even surprised that substances recognized as harmful and classified as toxic to people are still allowed in food packaging as well as other products.

One of the most recent analyse performed by consumer organizations from several EU countries (Austria, Belgium, Czech Republic, Denmark, France, Italy and Slovenia) led by International Consumer Research & Testing (ICRT), revealed high levels of BPA and other bisphenols not only in a variety of children's products, but also in large concentrations in canned food and drinks. Main findings and brief summary is available on the [BEUC web site](#).

In the analysis we found that all the 35 tested food cans and the 23 soda cans contained between 1 to 6 different bisphenol-related compounds. BPA was found in all 23 soda cans. In almost all samples of food cans, except two bought in France, BPA was one of the bisphenols detected.

Last but not least, as the recent Horizon 2020 research initiative, HBM4EU, revealed that 92% of Europeans from 11 EU countries were contaminated with BPA residues in their urine, the legislators must act NOW and take all the measures to reduce the burden of such toxic endocrine disrupters contributing to severe health problems including increasing rates of infertility and breast cancer. In light of EFSA's recent re-evaluation of the safety of BPA as used in FCMs from April 2023 when the tolerable daily intake levels were lowered 20,000 times, we strongly support the restriction that shall be adopted with no exemptions and for the entire class of bisphenols. By banning bisphenols (and ideally, PFAS too, which are regrettably not part of this public consultation), the EU will contribute to creating materials cycles that are toxics-free and easier and safer for recycling or reuse.

To achieve this, we recommend that the final restriction:

- bans the intentional use of BPA in all food contact materials and articles,
- bans all bisphenols meeting the criteria for classification in any of the hazard categories listed in Article 4.1.,
- enables effective Member State enforcement,
- extends the monitoring and reporting obligations to all bisphenols covered by Article 4.,
- ensures a swift phase out of BPA and other bisphenols from food contact materials and articles.

All measures are explained in more details in BEUC statement, which we strongly support. This submission is delivered as part of the project n. 101114078 — LIFE22-GIE-HU-ToxFree LIFE for All where consumer associations from Hungary, Slovenia, Czechia, and Austria plus Arnika are working on raising awareness among consumers to change their behaviour and choosing toxics-free products and materials.