

Polycarbonate/Bisphenol A group
Epoxy Resin Committee

French government report misrepresents the challenges of replacing BPA

Alternatives either do not exist or do not perform to the same level as BPA for different applications

Brussels, 26 November 2014. The Polycarbonate/Bisphenol A Group and Epoxy Resins Committee of PlasticsEurope reacted with significant concern to the French Government report¹ on possible substitutes to Bisphenol A (BPA) in food packaging materials, in the run-up to a proposed restriction in France from 1 January 2015 of such BPA-based materials.

The 70 page report, based on French industry responses to a questionnaire and compiling input from a number of French regulatory agencies, is only available in French language. This makes it very difficult for all non-French market partners to access the whole content. Typically, one would then only translate the final summary conclusion of the report. However: **The conclusion does not represent industry consensus about the situation regarding alternatives to BPA.** *“We are concerned the report may be misinterpreted as confirmation that a switch to alternatives other than BPA based products would be immediately feasible and comparably easy – this interpretation would be an unrealistic simplification of the challenges, and it contradicts to a large extent industry’s own assessment that was also presented to the French regulators”,* states Ralf Maecker, of the Epoxy Resin Group.

Specifically, **the conclusions of the report significantly underplay industry comments that describe the challenges faced during trials, qualification and industrial scale-up of proposed alternatives. It also ignores substantial performance shortcomings of alternatives, as described by companies in the comments** received for applications.

The report also provides no robust safety assessment of the proposed alternatives. For many of them, toxicological behaviour during long term exposure to food, and, as a consequence, humans, is far less well understood or documented than for BPA. The listed alternative substances, materials, or broad categories, therefore, cannot be automatically interpreted as safe and/or suitable, only because they are mentioned in the report. On the other hand, over 50 years of research and extensive use provides evidence that products made from BPA-based materials are safe for their intended uses, a fact supported by most recent assessments of global competent authorities (US FDA 2014 and European Food Safety Authority 2014).

Industry therefore remains strongly opposed to the unilateral and unjustified move by France to restrict BPA-based food contact materials, which contravenes the current EU-wide rules for plastics in food contact materials and provides no health benefit.

Jasmin Bird, of the PC/BPA Group, concluded: *“It is concerning to see that the report into potential BPA substitutes – published just seven weeks before the proposed restriction – fails to accurately describe the challenges and difficulties that will arise in France through an ultimately unjustified replacement of BPA - a well-tested and high-performing substance approved for use across the world in the packaging applications that the report addresses.”*

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¹ Requested by French Law No. 2012-1442 of 24 December 2012 which as of January 1, 2015, bans the manufacturing, import, export and placing on the market of any BPA based material intended for use in food contact packaging, containers and utensils for all food contact applications