

## **SAFE response to Public Consultation on Food safety – restrictions on bisphenol A (BPA) and other bisphenols in food contact materials**

SAFE – Safe Food Advocacy Europe welcomes the European Commission’s proposed ban of Bisphenol A (BPA) in food contact materials in the European Union. The decision aligns with the European Food Safety Agency (EFSA) recommendation, as published in December 2021, to drastically lower the tolerable daily intake (TDI) of BPA from 4 micrograms per kilogram of body weight per day to 0.04 nanograms per kilogram of body weight per day. This change stems from studies conducted between 2013 and 2018, highlighting the toxicity of BPA, particularly its adverse effects on the immune system.

SAFE acknowledges the alarming findings recently presented by the European Environment Agency, including their September 2023 report<sup>1</sup>, which highlights the widespread presence of BPA in the bodies of Europeans. The report revealed that 92% of adult participants from 11 European countries showed detectable levels of BPA in their urine, with a significant percentage exceeding the recommended maximum levels established by EFSA.

Microplastic and nanoplastic particles, including those containing BPA, have become pervasive pollutants, with recent advancements in analytical techniques allowing for their observation in human organs. These particles pose significant health risks, as evidenced by the identification of chemical traces of plastics, including BPA, in human tissue samples. This underscores the urgency for stricter measures to address the health risks associated with BPA exposure. Furthermore, numerous scientific studies show that micro- and nano-plastics can contaminate agricultural soils, irrigation water and oceans with BPA and other hazardous substances, which can in turn be absorbed by plants or fish and thus enter the food chain<sup>2</sup>.

SAFE recognizes the urgent need for action to mitigate the risks posed by BPA and other harmful substances in consumer products, including food packaging. We emphasize the importance of adopting the precautionary principle and implementing stricter requirements on chemicals to ensure the safety of consumers and the environment.

Moreover, SAFE advocates for a comprehensive approach that targets not only the presence of BPA but also other harmful substances such as per- and poly-fluoroalkyl substances (PFAS) and phthalates. We stress the importance of risk management and urge the phasing-out of these substances in primary articles to promote circularity and safety in recycling processes.

In addition to advocating for regulatory measures, SAFE underscores the importance of improving the availability and transparency of information on the content of chemicals of concern to empower consumers to make informed food choices. We believe that providing consumers with accurate information is essential for promoting food safety and supporting sustainable consumption practices.

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<sup>1</sup> <https://www.eea.europa.eu/en/newsroom/news/public-exposure-to-bisphenol-a>

<sup>2</sup> [https://www.safefoodadvocacy.eu/wp-content/uploads/2023/10/Bisphenol-A\\_Position-paper\\_04-10-23.pdf](https://www.safefoodadvocacy.eu/wp-content/uploads/2023/10/Bisphenol-A_Position-paper_04-10-23.pdf)

Furthermore, it is necessary to improve risk analysis by considering the interactions between different hazardous substances present simultaneously in the environment and in food. We need to move from a single-point risk analysis for individual substances to a multi-faceted analysis system, without which an accurate assessment of consumer exposure to dangerous substances cannot be made.

In conclusion, SAFE supports efforts to ban Bisphenol A and other harmful substances from consumer products. We urge policymakers to prioritize the protection of public health and the environment by developing relevant regulations and fostering transparency in chemical management and risk analysis for environmental and food safety.



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