



CHEM Trust
Protecting humans and wildlife
from harmful chemicals

Dr Bernhard Url
Executive Director
European Food Safety Authority
Via Carlo Magno 1A
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ITALY

31st March 2015

Concerns regarding EFSA's reporting of bisphenol A risk assessment

Dear Dr Url,

CHEM Trust is a UK registered charity that works in the UK, the EU and internationally to protect humans and wildlife from harmful chemicals.

We are writing to you to express our concern at the way in which the European Food Safety Authority (EFSA) has been communicating about the report of the CEF panel on the safety of Bisphenol A (BPA)¹.

We have a number of concerns about the CEF panel report², however we are particularly surprised at the way in which EFSA has reported the conclusions of this panel.

The conclusions of the summary report are different to the message in EFSA's communication: while the report speaks of "*low health concern*" for aggregated exposure, the press release only says "*no health concern*." (see explanatory annex for more details)

We have already written to the DG Santé Commissioner on this issue, and his department's response was.³

"Concerning the communication of the Opinion of the European Food Safety Authority (EFSA) on the risks to public health related to the presence of bisphenol A (BPA) in foodstuffs, indeed EFSA as an independent Authority is responsible for communication on risk assessment as per Article 40 of Regulation (EC) No 178/2002."

¹ E.g. "No consumer health risk from bisphenol A exposure"
<http://www.efsa.europa.eu/en/press/news/150121.htm>

² "Bisphenol A – new EFSA assessment cuts safe exposure level, calls for more research"
<http://www.chemtrust.org.uk/bisphenol-a-new-efsa-assessment-cuts-safe-exposure-level-calls-for-more-research/>

³ "EU Commission replies to our letter on misleading communication of Bisphenol A risk assessment, and on study into chemicals in food contact packaging"
<http://www.chemtrust.org.uk/eu-commission-replies-to-our-letter-on-misleading-communication-of-bisphenol-a-risk-assessment-and-on-study-into-chemicals-in-food-contact-packaging/>

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We are therefore writing to you to find out why EFSA did not accurately report the conclusions of this risk assessment of bisphenol A.

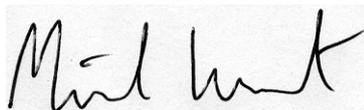
Firstly, we would like to know why the 'low concern' conclusion has been ignored EFSA's press and communications work around the CEF panel report and its conclusions on the safety of Bisphenol A? In our view any reasonable person would agree that 'no health concern' and 'low health concern' are not the same thing – and any risk assessor would not use the term 'low concern' rather than 'no concern' without reason.

Secondly, given that EFSA has made the commitment to provide “appropriate, consistent, accurate and timely communications”⁴, we think that it is only right that you should correct your press release and public materials to properly reflect the CEF panel conclusions. To avoid further confusion to those who have seen the original versions of these materials, we would expect you to publicise this correction.

Finally, given the considerable uncertainties in the CEF panel's exposure estimate for bisphenol A from non-dietary sources, does EFSA have any plans for follow-up research in this area?

In view of the public interest in this matter we will make this letter available on our website.

Yours sincerely,



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Explanatory annex (see also footnote 2 on previous page)

In the 'Overall Conclusions' of the Executive Summary of the CEF panel's report of its findings on Bisphenol A, it states that: (our emphasis)

central estimates for aggregated exposure to BPA via the dietary and non-dietary sources ..., is also below the t-TDI of 4 µg/kg bw per day, indicating that the health concern for BPA is low at the estimated levels of exposure. However, the CEF Panel noted that there is a considerable uncertainty in the exposure estimate for the non- dietary sources.

The emphasis on 'central estimates' is important, as in another part of the paper it is stated:

Upper bounds for the uncertainty of high but not average aggregate exposure estimates to BPA exceed the t-TDI

To summarise, the panel has found that exposure could exceed the t-TDI, as there are lots of uncertainties in exposure estimates. They have then described health concern as 'low'.

In contrast, the abstract of the panel report, the press release⁵ and other communications materials⁶ state that the panel found “no health concern” or “no health risk”. In our view any reasonable person would agree that 'no health concern' and 'low health concern' are not the same thing.

⁴ “What we do”, <http://www.efsa.europa.eu/en/aboutefsa/efsawhat.htm>

⁵ <http://www.efsa.europa.eu/en/press/news/150121.htm>

⁶ <http://www.efsa.europa.eu/en/corporate/doc/factsheetbpa150121.pdf>