Dear Emily Miles,

I am writing to you on behalf of a group of 10 NGOs with expertise in the fields of public and occupational health, environment and wildlife. We are writing to ask what action the FSA are taking on the newly revised tolerable daily intake (TDI), of bisphenol A (BPA), as has been recommended by the European Food Safety Authority (EFSA).

Based on a European Commission mandate to re-evaluate the risks to public health from the presence of BPA in foodstuffs, the EFSA Panel on Food Contact Materials, Enzymes and Processing Aids (CEP) reviewed over 800 new studies on BPA published since 2013 to address uncertainties on its toxicological effects. In light of this they recommended a new Tolerable Daily Intake (TDI) for BPA. This is:

- 0.2 nanograms per kilogram of bodyweight per day

This new TDI is around 20,000 times lower than the previous temporary level set in 2015 which was:

- 4 micrograms per kilogram of bodyweight per day

The UK BPA TDI remains at this temporary level.

The new TDIs are of great importance to human health. The Panel took into account harmful effects linked to BPA including effects on the immune, reproductive, developmental and metabolic systems. The experts from EFSA compared this new TDI with peoples’ estimated exposure to BPA and concluded that consumers with both average and high exposure to BPA in all age groups exceeded the new TDI which indicated health concerns. They state that “the health of people in all age groups, including young children, is at risk from bisphenol A in their diets”.

As NGOs we have worked on the health impacts of BPA for many years, highlighting the connections between exposures to BPA and neurodevelopmental effects on children, breast cancer, and the impacts of BPA and other bisphenols on the environment, wildlife and circular economy among other impacts. We urge the FSA not to delay any decision to adopt the new more protective recommendation by EFSA in light of the strong evidence of harm caused by BPA. As one of the most studied chemicals in the world, there is ample evidence on the health impacts allowing us to take the protective action needed.

The UK is already falling behind the EU’s approach to bisphenols, having only added BPA to its SVHC list compared to three bisphenols in the EU. The EU is also progressing a restriction proposal on five bisphenols whereas the UK is only at the RMOA stage for a narrower restriction on bisphenols in thermal paper. Finally, in light of EFSA’s new opinion on BPA, an initiative has been launched to impose a ban on the use of BPA in food contact materials, including plastic
and coated packaging. The FSA has an opportunity to act on EFSA’s scientific opinion and protect GB consumers from a chemical in their food which is known to be very harmful.

We are asking the FSA:

- To reassure us that the FSA will be revising the advice in the UK to be in line with the most up to date science. We note that the current advice on the FSA website which states that “dietary exposure to BPA is not a health concern for any age group” is 5 years out of date and does not reflect the most up to date science.

- To let us know what action the FSA will take to explore reduction measures for a better protection from BPA. For example, as the EU is doing, launching an initiative to ban BPA in food contact materials, including plastic and coated packaging, and addressing regrettable substitution that might arise from this.

We look forward to hearing from you on both of the issues raised. If you have any further questions, please don’t hesitate to get in touch.

Best wishes,

Michael Warhurst, Executive Director, CHEM Trust
Jamie Page, Executive Director, The Cancer Prevention and Education Society
Thalie Martini, Executive Director, Breast Cancer UK
Catherine Gunby, Executive Director, Fidra
Juliet Tizzard, Director of External Relations, Parkinson’s UK
Janet Newsham, Coordinator of Greater Manchester Hazards Centre, GM Hazards Centre
Roz Bulleid, Research Director, Green Alliance
Kate Metcalf, Co-Director, Women’s Environment Network
Chris Butler-Stroud, Chief Executive Officer, Whale and Dolphin Conservation
Jacquie Loughrey, Education and Prevention Officer, The Pink Ladies Cancer Support Group

*In view of the public interest in this matter, we intend to make this letter publicly available.*