

**Submission by the Endocrine Society to the European Chemicals Agency (ECHA) Consultation on the proposal to restrict bisphenols with endocrine disrupting properties for the environment.**

June 8, 2023

The Endocrine Society appreciates the opportunity to comment on the “European Chemical Agency proposed restriction on bisphenol A (BPA) and other bisphenols with endocrine disrupting properties for the environment.” As the world’s oldest, largest, and most active organization dedicated to the understanding of hormone systems and the clinical care of patients with endocrine diseases, we have long recognized the effects of endocrine-disrupting chemicals (EDCs) such as BPA on sensitive endocrine systems and we welcome group-based approaches to assessing and restricting bisphenols and other classes of EDCs. Such approaches are necessary to prevent harms to human and environmental health as a result of endocrine disruption, with impacts on metabolism, neurodevelopment, male and female reproduction, and other endpoints. In our comments, we propose several improvements to the proposal that reflect the state of the science on these hazardous substances.

**Include suspected endocrine disruptors:** We strongly support the element of the proposal that envisages expanding the scope of the restriction to bisphenols that are identified as substances of very high concern and/or classified as endocrine disruptors under category 1 of other regulations. However, we assert that consideration should also be given to developing restrictions under the category 2 of suspected endocrine disruptors as currently proposed under the regulation on Classification, Labeling and Packaging. The “suspected” category of EDCs is needed because data gaps exist for many chemicals individually, but we expect that many if not all members of the class of bisphenols will be expected to have similar effects at low levels. Therefore, to prevent regrettable substitutions, the final regulation should make use of all available scientific evidence and include restriction options for category 2 substances.

**Strictly limit the scope of derogations:** We are concerned that there are several significant derogations in the proposal that may result in substantially increased exposure to humans and the environment. It is also unclear how the proposed uses and criteria that trigger derogations will be validated. It is critical that human and environmental health not be sacrificed for convenience; we urge ECHA to strictly limit derogations.

**Introduce restrictions to protect human health:** While we appreciate that the focus of the proposed restriction is on environmental releases, we urge ECHA to consider restrictions that also include the proposed CLP categories of EDCs for human health. The persistent and widespread use of bisphenols has created complex exposure scenarios that result in harms to both human and ecological health. We urge ECHA to develop a final restriction proposal that provides more comprehensive protections consistent with the One Health approach.



We are convinced that group-based approaches, if implemented effectively and with the ability to capture all suspected and confirmed EDCs, will generate transformative measures that will reduce the incidence and consequences of endocrine diseases. Implementation of our suggestions above will help ensure that the proposal under discussion will advance this goal. Thank you for considering the Endocrine Society's comments. If we can be of further assistance, please contact Joe Laakso, PhD, Director of Science Policy at [jlaakso@endocrine.org](mailto:jlaakso@endocrine.org).