

December 15, 2015

Vytenis Andriukaitis
European Commissioner, Health and Food
Safety
Rue de la Loi, 200
B-1049 Brussels – Belgium

Re: Rules concerning use of Bisphenol A in
food contact materials

Dear Dr. Andriukaitis,

The Endocrine Society appreciates the opportunity to participate in the public consultation on rules concerning use of Bisphenol A (BPA) in food contact materials. We do not take a specific position on any of the 5 regulatory approaches to restrict exposures to BPA. Instead, our comments are intended to help ensure that regulatory decisions on BPA are based on a complete analysis of the public health risks associated with exposures to BPA. This analysis should integrate assessment of BPA in food contact materials with other sources of exposure to BPA.

Founded in 1916, the Endocrine Society is the world's oldest and largest scientific society dedicated to the study and treatment of endocrine diseases. We are proud that our membership of over 18,000 includes the world's leading experts on hormones and endocrine disrupting chemicals (EDCs) from over 120 countries. The Endocrine Society works with our member experts to craft policy documents, statements, and other resources to help ensure that governments and regulatory agencies worldwide are able to make evidence-based decisions regarding EDCs.

BPA is a known EDC that humans are routinely exposed to through a variety of sources, including ingestion of food that has been in direct contact with BPA e.g., in the linings of cans. Recently, the Endocrine Society published its Second Scientific Statement on Endocrine-Disrupting Chemicals¹. This statement includes 223 references to peer-reviewed, original scientific publications on BPA. The statement strongly makes the case that adverse effects due to BPA action can involve many different receptors and mechanisms, demonstrating that BPA can act through non-estrogenic pathways. Furthermore, BPA can exhibit non monotonic dose response relationships and the effects of BPA exposures can persist through multiple generations, potentially harming the unborn children and grandchildren of exposed individuals.

The Scientific Statement contains evidence that exposure to BPA can contribute to disruption of all of the topics addressed in the manuscript, including obesity and diabetes, female reproduction, male reproduction, hormone-sensitive cancers in females, prostate cancer, thyroid, and neurodevelopment and neuroendocrine systems. Although the strength of evidence is variable across some aspects such

¹ Gore, AC et al., "EDC-2: The Endocrine Society's Second Scientific Statement on Endocrine-Disrupting Chemicals." *Endocr Rev.* 2015 Dec;36(6):E1-E150.



as human epidemiological studies on obesity and diabetes, we believe that the evidence justifies reasonable concern.

In conclusion, it is critical that regulatory decisions for specific chemicals assess the spectrum of uses, sources of exposure, and potential effects for the chemical in question. We hope that the DG SANTE will make use of the Scientific Statement in regulatory decisions related to the use of BPA in food contact materials. This publication has been uploaded to the public consultation website as a separate attachment. Thank you for considering the Endocrine Society's comments. If we can be of any further assistance, please do not hesitate to contact Joseph Laakso, PhD, Associate Director of Science Policy at jlaakso@endocrine.org.

Sincerely,

Lisa Fish, MD
President, Endocrine Society