

Für Mensch & Umwelt – „The UBA“

Information on

Bisphenol A - Restriction Intention

15.09.2020

Timeline: RMOA until today

Monitoring

of wastewater treatment plant effluents and surface waters
from 2017 to 2019

Research

Release from polymer materials

RMOA

The conclusion was published on the ECHA website in
June 2017.

<https://echa.europa.eu/documents/10162/f39eafc1-f58d-de22-7be3-2cd64eef62a7>

Consultation Processes

with IND

Transformation of BPA (in body and environment), life-cycle and recycling

BPA is environmentally available

Why restriction

Emissions must be minimized

as BPA is a substance with ED properties and does not have a safe threshold in the environment
(an environmental risk cannot be estimated quantitatively here)

Authorization

- According to Art. 56 REACH Regulation only placing on the market of substances for use or application

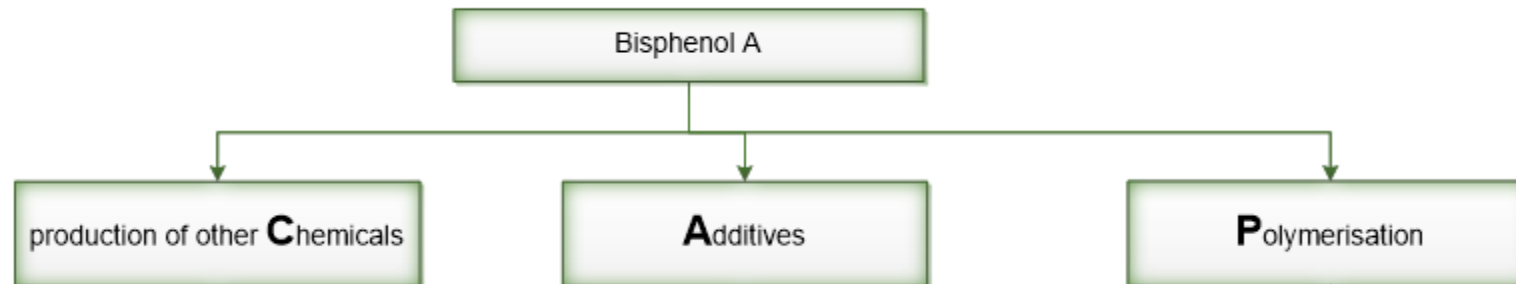
- Uses at concentrations less than 0.1 % w/w are exempted from this provision

Restriction

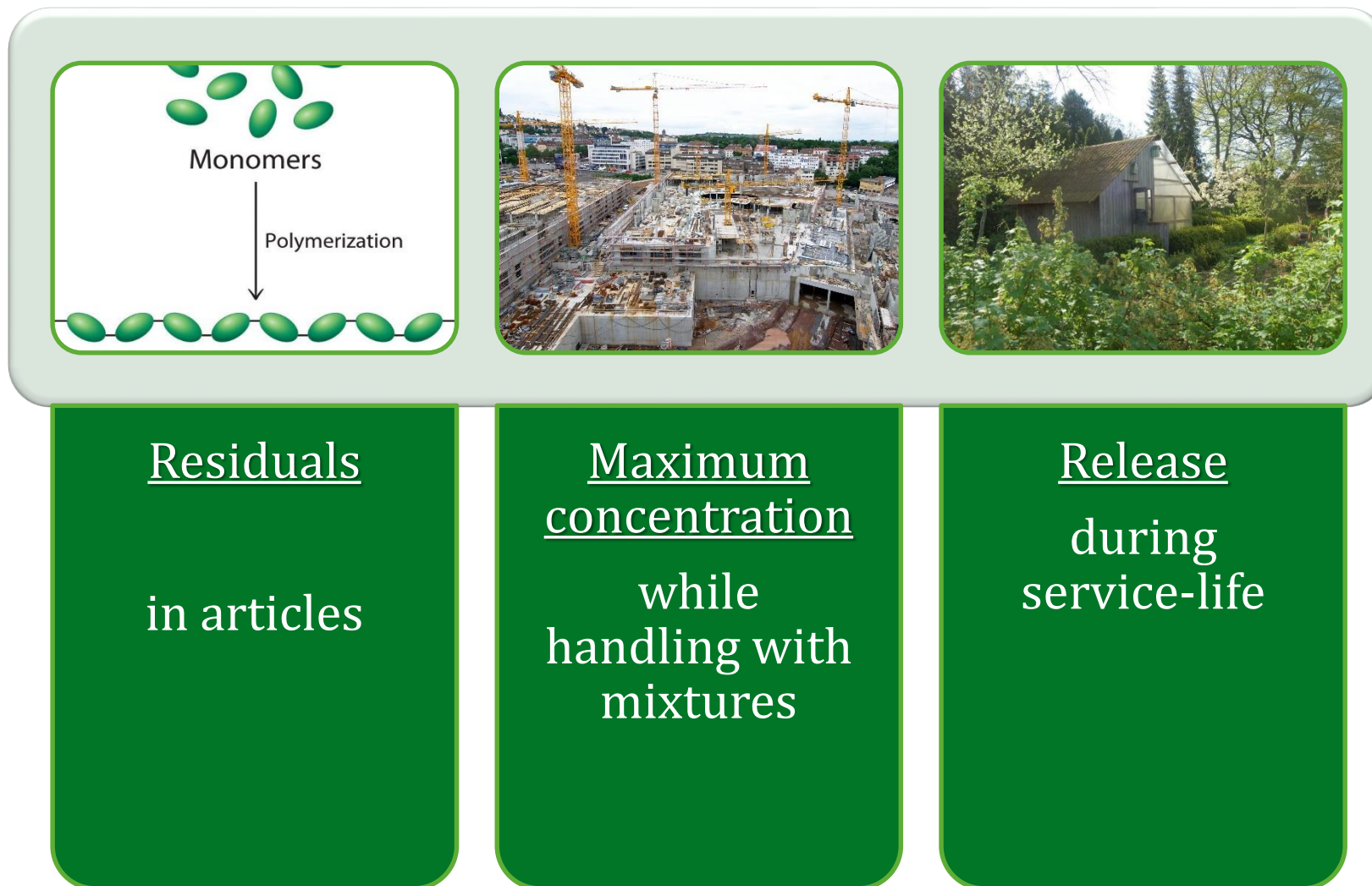
- Art. 68 REACH Regulation regulates substances, substances in mixtures, substances in articles
- Manufacture and placing on the market

- Also applies to the EU market for imported goods
- No specifications on relevant concentrations for safe use

Known function of BPA



Content of the restriction



Processing stage of BPA

1. Marketed articles for intended use [manufactured material]
2. mixture/ pre-formulations that are processed into products
3. articles during their life cycle or intended use [stressed material]

Both 1. and 3. aim at the marketability of the material / articles

“Residuals in articles”

background

- If residues in the material can be avoided even during production, direct emissions to the environment (e.g. building materials for outdoor use) and indirect emissions via waste water into the environmental compartment (e.g. food and contact materials) are reduced
- If the use of BPA as an additive declines, several tons of BPA will not be released into the environment through the life cycle of products

“Maximum concentration while handling with mixtures”

background

- The consumer should not use mixtures containing BPA above a certain quantity limit. He is not trained in handling these mixtures and the processing of epoxy resins, e.g. in the environmental field, is likely.
- Professional users can also be expected to use the product in an environmentally sensitive area.
- For industrial users, the use in a plant is intended. The handling of BPA-containing mixtures and pre-formulations for the production of articles is usually subject to an automated process and the emissions of the plant are also subject to monitoring - SME plants are excluded from this, however.
- Possible exceptions from this point can be formulated for e.g. applications in closed rooms, use in large-scale technical plants and for personnel with training certificate.

“Release during service-life of products”

background

- Studies prove that polymers are subject to a limited lifetime - Polycarbonate, for example, can release oligomers and the monomer BPA through environmental stressors as well as other stressors such as cleaning agents in addition to microplastics.
- Various polymers containing BPA as an additive can also release this substance through degradation processes
- Various release rates may need to be derived for the type of application such as indoor, indoor with stressors and outdoor (IND information required)

Regrettable Substitution

Open the scope

Bisphenols with similar concern

Prevent regrettable substitution for BPA as an additive with other bisphenols of the same hazardous or ecotoxicological potential

„drop-in“ substitutes seem to be most affected

Call for evidence

- RAC and SEAC opinions inform EU decision-making.
- The dossier submitter supports the work by RAC and SEAC.
- Proportionality of a restriction and derogations depend on:
 - hazards and risks
 - socio-economic costs and benefits
 - availability of alternatives
- Use specific derogations might be justified but depend on robust information.
- Submit any information you consider relevant.
- Be specific about the use(s) to which the submitted information relates to.
- Among other things, the following information might be useful:



Call for evidence

Hazard & Risk	Costs	Alternatives
<ul style="list-style-type: none"> • Description of uses • Quantities used • Quantified release estimates <ul style="list-style-type: none"> ⑩ Production ⑩ Service life ⑩ End of life • Market share • Share of imported products in the market • Relevance of exports 	<ul style="list-style-type: none"> • Economic impacts expected <ul style="list-style-type: none"> ⑩ Annual ⑩ over 20 years • Investments needed • Impact of different transitional periods • Impact of performance loss • Impact on imports/exports • Other consequences 	<ul style="list-style-type: none"> • Availability of alternatives <ul style="list-style-type: none"> ⑩ what alternatives ? ⑩ information on hazards and risks of alternatives • Detailed substitution plan (in case of longer transition period) • Obstacles to substitution <ul style="list-style-type: none"> ⑩ Costs ⑩ Impact on performance ⑩ Other

➔ Derogations are considered use specific – not user specific. It is important to gather individual information on emissions, costs and availability of alternatives. But it is also important to understand, how your submitted data relates to the overall market for a specific use.

Planned Restriction on BPA – Next Steps

- to restrict BPA is planned to be published on **1 October 2020** in the „**Registry of Intentions**“ at ECHA’s website
- Submission of the Annex XV **restriction dossier** on **1 October 2021** at the latest
- Formal **public consultation** of the dossier will be launched after the conformity of the dossier has been approved by ECHA’s scientific committees.
- Before submission, it is intended to hold an additional, informal „**Call for Evidence**“

Thank you very much for your interest

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