October 15, 2018

Dear Members of the Panel on Food Contact Materials, Enzymes, Flavourings and Processing Aids (CEF),

The Endocrine Society appreciates the opportunity to participate in the public call for data relevant to the re-evaluation of Bisphenol A (BPA) Tolerable Daily Intake (TDI). Founded in 1916, the Endocrine Society is the world’s oldest, largest, and most active organization devoted to research on hormones and the clinical practice of endocrinology. The Endocrine Society’s membership consists of over 18,000 scientists, physicians, educators, nurses, and students in more than 100 countries. Society members represent all basic, applied and clinical interests in endocrinology. Included among the Society’s members are the world’s leading experts on the health effects of endocrine-disrupting chemicals (EDCs) including BPA.

Upon review of the final protocol for the re-evaluation of BPA, we are extremely concerned that the review will not take into account data published prior to 2013. As we stated in our earlier response to the hazard assessment protocol, important data for critical endpoints will be omitted from the re-evaluation unless a systematic review of all the relevant literature is conducted. For example, important data from studies on mammary gland effects of BPA were previously disregarded by EFSA due to the use of subcutaneous exposures (via osmotic pumps), but these same data would now need to be evaluated based on the criteria provided in the new protocol. This is likely the case for other endpoints, including the endocrine pancreas.

In the appendix to this letter, we submit references to scientific articles about the effects of BPA published in peer-reviewed journals. We encourage the European Food Safety Agency to consider these and other studies in the evaluation of BPA. Please note that these papers do not represent the entirety of relevant data and knowledge on BPA, and we encourage EFSA to transparently and systematically evaluate sources of peer-reviewed scientific literature for additional data on the health impacts of BPA exposure.

Thank you for considering our comments. If you have any questions, or if we can be of any additional help in your efforts, please reach out to Joseph Laakso, Director of Science Policy, at jlaakso@endocrine.org

Sincerely,

Angel Nadal, PhD
Chair, EDC Advisory Group
Endocrine Society

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APPENDIX: Selected publications on the effects of BPA.


Rubin BS, Lenkowski JR, Schaeberle CM, Vandenberg LN, Ronsheim PM, Soto AM. 2006. Evidence of altered brain sexual differentiation in mice exposed perinatally to low, environmentally relevant levels of bisphenol A. Endocrinology 147: 3681-91


**Papers on BPA replacement chemicals:**

Kolla S, Morcos M, Martin B, Vandenberg LN. 2018. Low dose bisphenol S or ethinyl estradiol exposure during the perinatal period alter female mouse mammary development. Reproductive Toxicology. 78: 50-59.


