Dear Prof. Jany,

We are writing to welcome the announcement on the European Food Safety Authority (EFSA) website that the CEF panel will be considering ‘hundreds of studies in its review and analysis of the most recent scientific literature’ in its review of the TDI of bisphenol-A in food contact products.

Over the last decade and a half, a substantive body amounting to several hundred peer reviewed scientific papers, have been published that have highlighted potential adverse health effects associated with BPA exposures, at internal doses relevant to levels of biologically active BPA found in humans.

As a March 2010 Review (Vandenberg et al) of 80 bio-monitoring studies of BPA in Environmental Health Perspectives makes clear; ‘The two toxicokinetic studies performed to date, which suggest that human exposure is negligible, have significant flaws and are therefore not reliable for risk assessment purposes.’

However, in its prior risk assessments of BPA, EFSA only relied on a small number of studies rather than the much larger number that the United States Food and Drug Administration recently recognised as valid and of high utility in its risk assessment of BPA, and which led the FDA to express concern about the health hazards posed by BPA.

Only a tiny minority of studies have articulated that BPA exposure is completely safe, and many of these research papers have been criticised in academic commentaries and responses as having serious flaws, but it is these few flawed studies that EFSA previously relied on to declare BPA safe.

For example, a letter co-authored by 24 scientists published in the February 2010 edition of Toxicological Sciences states; ‘Publishing studies that conclude no harm in response to low doses of endocrine disrupting chemicals, when the studies did not include a positive control (Tyl et al., 2002), included inappropriate doses of positive controls (Ryan et al., 2009; Tyl et al., 2008), or included positive controls that showed no effect (Cagen et al., 1999), is inappropriate in peer-reviewed journals (Myers et al., 2009a,b; vom Saal and Welsbourn, 2006). Such studies violate basic principles of study design.’

Many scientific studies are now calling into question the safety of BPA. For example, a recent study has highlighted that BPA may contribute to metabolic disorders relevant to glucose homeostasis, and suggests that BPA may be a risk factor for diabetes (Alonso-Magdalena et al.,
Moreover, experiments at Yale university report that BPA may induce altered developmental programming (Bromer et al., 2010), and Doherty et al (2010) of Yale university have published a study which raises the concern about epigenetic effects of BPA on the regulation of the mammary gland, with potential implications for breast cancer risk. Endometriosis is also a concern as work by Signorile et al (2010) highlights that pre-natal exposure of mice to bisphenol-A causes an endometriosis-like response in female offspring.

It is therefore our opinion that any objective and comprehensive review of the scientific literature will lead to the conclusion that action is necessary to reduce the levels of BPA exposure, particularly in groups at highest risk, namely young infants and pregnant mothers.

There are an increasing number of countries that are either already committed to this course of action, or have signalled that they will soon be undertaking similar measures.

We share the concerns of these Governments and regulators and believe that reducing BPA exposure to these groups is both scientifically sound and in the best interest of public health.

As such, we call on you as the Chair of the CEF panel and the CEF Committee Members in their ongoing review to include all relevant studies, including bio-monitoring studies, and based on that evidence we conclude that there is a strong scientific mandate for action.

Yours sincerely,

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Prof. Patricia Hunt, Meyer Distinguished Professor, School of Molecular Biosciences, Washington State University

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Jane Muncke, Ph.D, Environmental Toxicologist, Emhart Glass SA, Switzerland.

John Peterson Myers, Ph.D., Chief Scientist, Environmental Health Sciences, Charlottesville VA.

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Prof. Nicolas Olea, MD, University of Granada, University hospital.

Prof. Gail S. Prins, PhD, Professor of Physiology, Department of Urology, University of Illinois at Chicago.

Prof. Fredrick vom Saal, Curators Professor of Biological Sciences, University of Missouri-Columbia.

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Prof. R. Thomas Zoeller, Biology Department, Morrill Science Center, University of Massachusetts.

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Action for Breast Cancer, Malta

Alliance for Cancer Prevention, UK

Arnika, Czech Republic

Association for Environmental and Chronic Toxic Injury, Italy

Austrian section of ISDE (International Society of Doctors for the Environment), Austria

Breast Cancer Fund, USA

Breast Cancer UK, UK

BUND / Friends of the Earth Germany, Germany

Cancer Prevention and Education Society, UK

ChemSec –International Chemical Secretariat, International

CHEM Trust, UK
Chemical Sensitivity Network, Germany
Clean Air Action Group, Hungary
Comité pour le Développement Durable en Santé, France
Danish Consumer Council, Denmark
The Danish Ecological Council, Denmark
Eco-Accord Program on Chemical Safety, Eastern Europe, Caucasus and Central Asia
EcoAid, Germany
Ecologistas en Acción, Spain
Environmental Health Fund, USA
Environment Illinois, USA
European Environmental Bureau, EU
Finnish Association for Nature Conservation, Finland
Friends of the Earth Spain, Spain
Global 2000 / Friends of the Earth Austria, Austria
Health and Environmental Network, Europe
Health Care Without Harm, International
Indiana Toxics Action, USA
Instituto Sindical de Trabajo Ambiente y Salud, Spain
The Irish Doctors’ Environmental Association, Ireland
Italian Endometriosis Foundation, Italy
Plastic Planet, Austria
Rachel's Friends Breast Cancer Coalition, USA
Réseau Environnement Santé, France
Society for Sustainable Living, Czech Republic
Unison, UK
VHUE e.V., Germany
Women in Europe for a Common Future, Europe
Women’s Environmental Network, Scotland
Women's Voices for the Earth, USA
WWF European Policy Office, Europe
References


