

## **Breast Cancer UK response to the Consultation on the draft Opinion of the Committee for Socio-Economic Analysis on the Annex XV dossier proposing restrictions on BPA in thermal paper**

16<sup>th</sup> November 2016

Breast Cancer UK is dedicated to the prevention of breast cancers by reducing public exposure to the carcinogenic, hazardous and hormone disrupting chemicals which are routinely found in the environment and everyday products. We welcome the opportunity to comment on the Committee for Socio-Economic Analysis (SEAC) draft opinion on restrictions on Bisphenol A (BPA) in thermal paper.

Breast Cancer UK support fully the restriction proposal of bisphenol A (BPA) in thermal paper, in order to reduce worker, consumer and environmental exposures. Numerous studies, including many cited in the committee for risk assessment (RAC) report, have demonstrated that BPA alters mammary tissue, including changes which are likely to increase breast cancer risk. The restriction proposal aims specifically to address the risks for human health of pregnant woman and their unborn children. As documented in the RAC report, studies have shown fetal exposure to BPA at environmentally relevant doses alters mammary glands in animals, and is likely to affect human mammary glands which may result in breast cancers in later life. Evidence also suggests BPA exposure affects the female reproductive system, metabolism, obesity, the brain and behaviour and the immune system.

Breast Cancer UK believe the restriction should be extended to other bisphenols which may be used as BPA substitutes, as these are also suspected of being similarly toxic and damaging to human health and the environment. The RAC considered imposing a ban on all bisphenols in thermal paper, but dismissed this option due to lack of toxicology data. We support fully SEAC's suggestion that a restriction proposal on BPS should be carried out if a restriction on BPA is implemented.

Breast Cancer UK is disappointed that SEAC consider the proposed restriction on BPA in thermal paper "unlikely to be a proportionate measure in terms of standard benefit cost considerations". We disagree with this strongly, and do not believe a "break even level of benefits" on which the conclusion is based is an appropriate way to assess potential breast cancers and other health outcomes associated with BPA. SEAC acknowledge that "adverse health effects arising from exposure to BPA can occur to the descendants of exposed female cashiers and consumers", that "action to address risks to human health aimed at workers is justified on an EU wide basis" and "that the proposal is implementable, enforceable and manageable". Despite this, SEAC has described the restriction as unlikely to be proportionate, based on calculations of excess risk estimates of specific health outcomes versus substitution costs.

SEAC argues the largest benefits are likely to be achieved if substitution from BPA is to a non-bisphenol alternative - which we agree strongly with - and estimate the corresponding costs would be €43 - €86 million per year. If the costs are transferred into increased prices of consumer goods, the amount per EU-citizen will amount to ca. €0.1 – €0.2 per person per year. The draft opinion states that in order for the health benefits of the restriction to offset the total costs of transition to a non-bisphenol alternative the hypothetical absolute risk reduction for the given adverse effects would have to be (medium cost) 5% having mammary gland changes, 8% having immunotoxicity-related allergies, 2% having neurobehavioral effects, 6% experiencing adverse reprotoxic effects and 4% having hypercholesterolemia or weight gain. The relatively trivial costs of removing BPA are equated with potentially enormous costs to human health, including probable increases in breast cancer incidence. Furthermore, this type of cost-benefit analysis does not appear to take into consideration the personal costs to those suffering from breast cancers and other health impacts associated with BPA exposures.

SEAC estimate that 39,500 female babies may be at risk of changes to their mammary glands following *in utero* exposure from BPA in thermal paper. If a quarter of these children develop breast cancer as a result, this would equate to around 10,000 additional breast cancer cases.

Breast Cancer UK support strongly the proposed restrictions of BPA in thermal paper as outlined in the Annex XV dossier as a means of helping to protect future generations from an environmental health hazard.