



Breast Cancer UK comment on draft bisphenol A (BPA) hazard assessment protocol by the European Food Safety Authority

Submitted to EFSA September 1st 2017

Breast Cancer UK welcomes the opportunity to provide feedback on the protocol EFSA plans to use to reassess the toxicology of bisphenol A. Breast Cancer UK is a charity which aims to prevent breast cancer by reducing public exposure to hazardous chemicals in the environment. We are especially concerned about the potential role of exposures to environmental chemicals, such as bisphenol A, in increasing breast cancer risk.

Overall, the protocol presented by EFSA will provide an appropriate assessment of the hazards associated with BPA, although we do have some concerns with details of some of the methods proposed.

We agree with the use of a systematic review structure (line 182 and line 231), and believe the search strings described (Appendix A) are comprehensive and the approach is robust. However, the proposed methodology appears to lack clarity in certain areas. Specifically, the assessment of the reliability of the evidence, in particular the quality of assessment (line 441), is not clearly defined and appears subjective, and the weight of evidence assessment (lines 628-683) is insufficiently clear. We also have concerns regarding the date cut-off proposed for the studies to be considered. One of the terms of reference (line 143) is to “re-evaluate the risks to public health related to the presence of bisphenol A in foodstuffs”, and in particular this “re-evaluation should take into consideration new data”. This doesn’t mean previously appraised data cannot be re-considered. The protocol goes on to state that “few studies published after 31/12/2012 and already appraised by the CEF panel in its 2015 opinion or in its 2016 statement on immunotoxicity (EFSA CEF panel 2016) will not be reappraised” (lines 184-186). As a different methodology will be used, and older studies are few in number, it would be preferable to include these in the new assessment, to avoid any potential bias. Finally, we would welcome inclusion of a meta-analysis, as this would provide a summary result which is clear and easy to interpret. As such, we propose the inclusion of a protocol for meta-analysis in the final hazard assessment protocol.

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