



National Institute for Public Health
and the Environment
Ministry of Health, Welfare and Sport

Prioritizing functional alternatives to bisphenol A

23/10/2024

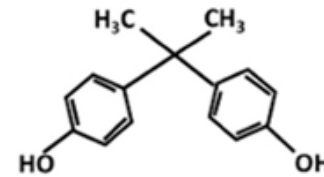
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Bisphenol A

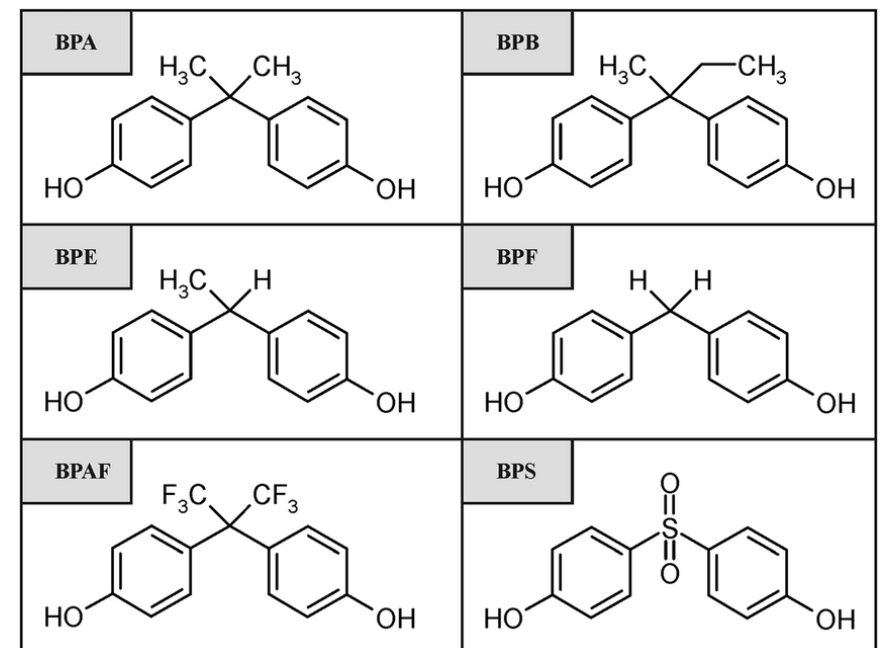
- > BPA commonly used in FCM
- > Restricted use
- > Classified as SVHC
- > BPA to be banned in FCM





Bisphenol A alternatives

- > Regrettable substitution
- > Not one dedicated alternative for all applications





Research project

- › The Netherlands Food and Consumer Product Safety Authority (NVWA)
- › Aim to advise the NVWA in their research to test the migration of BPA alternatives from FCM to obtain occurrence data for risk assessment
 1. What functional BPA alternatives may be applied in FCM and can these be prioritized?
 2. What is known on the toxicity and migration of these alternatives?



Project outline

- > Inventory of potential BPA alternatives
 - Substances indicated as BPA alternative
- > Functionality
 - Polymerization
- > Prioritize
 - Based on five criteria
- > Toxicity, migration and (Q)SAR
 - Prioritized substances





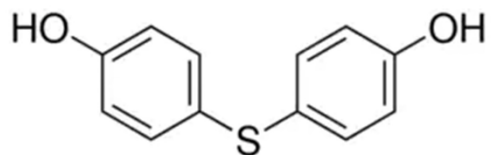
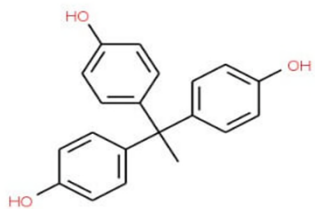
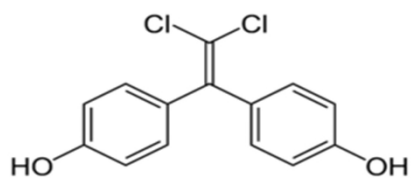
Inventory

- › Inventory of substances (since 2018)
 - Scientific literature
 - ECHA's assessment of regulatory needs for the group of bisphenols
 - The 2017-2018 review cycle of the Identification of Risk Assessment Priorities (IRAP), performed by Environment and Climate Change Canada (ECCC) and Health Canada (HC)
 - The Notice with respect to bisphenol A (BPA) and BPA structural analogues and functional alternatives (Published in the Canada Gazette, Part I on November 13, 2021)
 - Technical Consultation: Proposed Subgrouping of Bisphenol A (BPA) Structural Analogues and Functional Alternatives - Environment and Climate Change Canada Health Canada - An UBA report on substitution candidates for BPA and BPA analogues
 - The dedicated website of the French National Institute for Industrial Environment and Risks (INERIS) that promotes safer alternatives to bisphenols
- › **376 substances** named as BPA alternatives

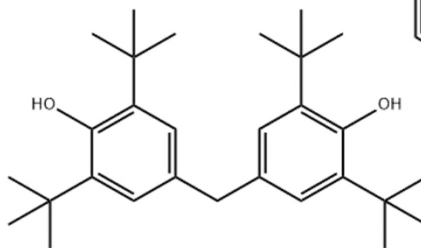
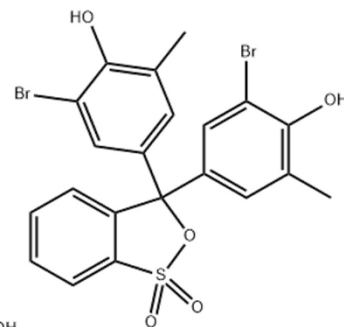
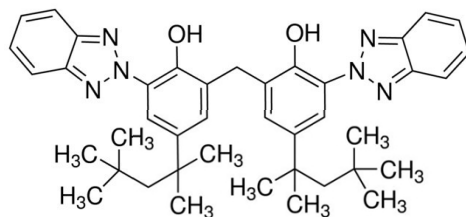


Functionality

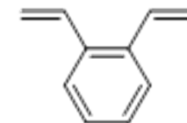
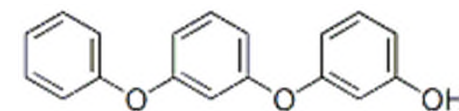
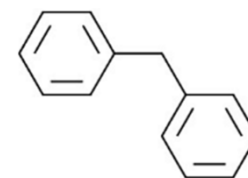
> Yes (n=152)



> Questionable (n=69)



> No (n=155)





Prioritization

Exclude based on:

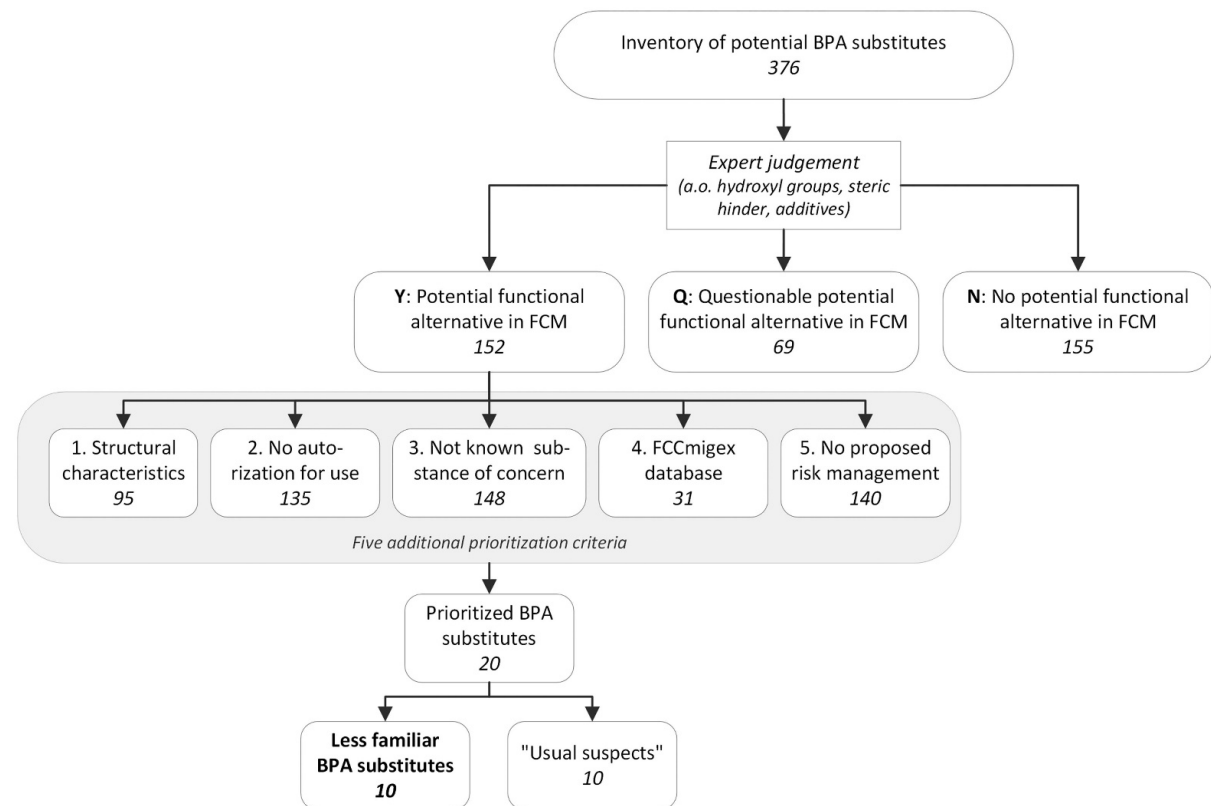
1. Additional structural characteristics
2. No authorization in FCM
3. No classification as SVHC
4. Migration/occurrence measurable (FCCmigex database)
5. No risk management proposed (ECHA)



Summary

Table 1. Overview of the selected potential BPA alternatives in the current study and their CAS numbers.

Substance	CAS
Bisphenol TMC	129188-99-4
4,4'-Dihydroxydiphenyl ether	1965-09-9
2,2'-Bisphenol F	2467-02-9
2,4'-Bisphenol F	2467-03-0
4,4'-Dihydroxybenzophenone	611-99-4
2,2'-Bisphenol A	7559-72-0
Tetrachlorobisphenol A	79-95-8
3,3'-Dichlorobisphenol A	79-98-1
BPA 2EO	901-44-0
Benzophenone-6	131-54-4



> BPAP, BPZ, BPH ...



Toxicity, migration and QSAR

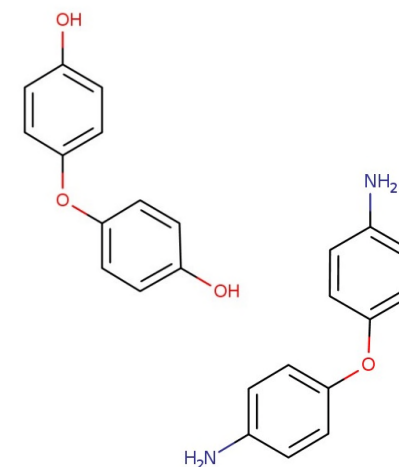
- > Toxicity
 - REACH
 - 26 individual research papers
 - Rarely *in vivo* rodent studies
 - Ecotoxicology

- > Migration
 - 18 individual studies
 - Few positive analyses
 - Sensitivity of the methods differ



Structure-activity en structural similarity

- > Structure-activity
 - Derek Nexus software tool (LHASA)
 - Link structure to possible effects
 - TCBPA structural alert for carcinogenicity (polyaromatic hydrocarbon)
 - BPTMC structural alert for estrogenicity/carcinogenicity (BPA)
- > Structural similarity tool (RIVM)
 - Structural similarity to SVHCs
 - 5/11 substances similar (above threshold) to BPA
 - Other SVHC substances with R/ED/CM properties
 - P,p-oxybisphenol - 4,4'-oxydianiline (CM)





Stakeholder consultation

- › Dutch trade organizations
- › Short chats, written reply or survey

- › Coatings IP protected
- › BPA will be used as long as it is allowed
- › Alternatives are available – costs are the limiting factor
 - Not one substitute for all applications of BPA
 - Although more complicated for heavy duty coatings





In conclusion

- › Prioritization strategy to identify alternatives to BPA
 - Can also be applied to similar cases
 - Can be modified based on relevant criteria

- › Data gaps for lesser-known alternatives
 - Even though similarity with BPA or other SVHCs
 - Migration potential



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Thank you!