Green Warriors of Norway ECHA REACH Bisphe…

Green Warriors of Norway ECHA REACH Bisphenol Comments and Evidence

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REACH – Comments and documentation

4,4' -isopropylidenediphenol (Bisphenol A)
and structurally related bisphenols of similar concern for the environment

Green Warriors of Norway/Norges Miljøvernforbund (NMF) raise several concerns
increased use of Bisphenol A (BPA) and related chemicals and their impact on onsh
environment and ecosystems. Much of the current and future impact will come from
sources, and from sources that will increase in new areas and environments. One of
concern is from micro and nano sized particles released into the environment from e
products by erosion. Such particles that contain BPA related substances will protect
chemicals and protect them from degradation while they remain inside the particle r
Trojan Horse, be released into the food chain through organisms when in contact wi
system. It is also concerning that research show that BPA do generational harm to o
to a recent study of Rainbow trout.

These factors and more raise serious concerns as the development and placement of
reliant upon BPA containing epoxy structures reaches new frontiers with harsher an
weather conditions. While chemicals like BPA in its pure form is degraded normally
environment, salt water and colder temperatures in more arctic and sub-arctic enviro
impact the rate of degradation significantly, which make them remain a potent bioch
a much longer period than in more tempered environments. Within the protection of
particle, they will remain a potent biochemical pollutant significantly longer than th
pure form.

With micro and nano sized particles found in larger and larger quantities on the farth
planet, from the furthest away glaciers to sediments on the deepest seabed, the conc
human impact on the various onshore and offshore environments accumulate and is

You will find our concerns and demands in more detail on the following pages.

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Index

Summary and demands

We will in our comments show that epoxy compounds is a Trojan Horse regarding t
Bisphenol A (BPA, EC No.: 201-245-8 CAS No.: 80-05-7, 4,4'-isopropylidenediphe
environment and to our food chain.

Regarding the concerns we raise, we will put forth some demands in accordance wit
principle. Based on the documentation we present in this brief, we are significantly
biochemical pollution BPA can cause in unknown proportions in regard to the envir
biodiversity, marine and fresh water sources, and the food chain we all are depende

We do ask on what scale is BPA levels a threat as a biochemical pollutant in differe
towards different food chains? Do we as humans have enough knowledge to predict
and harm?

> *"This is the first systematic review, to our knowledge, to assess and quantify MP co*
> *of seafood and human uptake from its consumption, suggesting that action must be c*
> *order to reduce human exposure via such consumption. Further high-quality researc*
> *standardized methods is needed to cement the scientific evidence on MP contaminat*
> *human exposures.*
>
> *Seafood is an important source of protein for populations around the world, and it m*
> *to implement the precautionary principle (Kriebel et al. 2001), based on the existing*
> *evidence, and take steps in policy, industry, and society to minimize human exposure*
> *foodborne MPs where possible. "* [1]

Our demands below is sound and reasonable and is based on a precautionary princip
strict regulations to avoid as much BPA and BPA in a combination with micro and n
of epoxy plastics released into the environment as possible.

Here are our demands:

1. We would like the placement of new large-scale installations that may cause t
and related chemicals into the environment may stop, **but acknowledge that str**
and standards must be put in place to reduce the impact on the environment, ecos
food chain and on human health.
Scientific research must be prioritized where there is a lack of knowledge. A
assessment must be conducted before new projects that may cause release of
chemicals to the environment. All deployment of epoxy related industries mu
until proper scientific standards are met to show them safe to the environmen
biodiversity and human health. This applies to both production, use and dism
and deposit of such materials.

[1] https://ehp.niehs.nih.gov/doi/10.1289/EHP7171