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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 onshore environment and ecosystems. Much of the current and future impact will come from onshore sources, and from sources that will increase in new areas and environments. One of the concerns is from micro and nano sized particles released into the environment from consumer products by erosion. Such particles that contain BPA related substances will protect the chemicals and protect them from degradation while they remain inside the particle. Like a Trojan Horse, be released into the food chain through organisms when in contact with the environment. It is also concerning that research shows that BPA does generational harm to organisms. According to a recent study of Rainbow trout.

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

With micro and nano sized particles found in larger and larger quantities on the farthest reaches of the planet, from the furthest away glaciers to sediments on the deepest seabed, the combined 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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Summary and demands

We will in our comments show that epoxy compounds is a Trojan Horse regarding to Bisphenol A (BPA, EC No.: 201-245-8 CAS No.: 80-05-7, 4,4'-isopropylidenediphenol) environment and to our food chain.

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

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

“This is the first systematic review, to our knowledge, to assess and quantify MP contamination of seafood and human uptake from its consumption, suggesting that action must be taken in order to reduce human exposure via such consumption. Further high-quality research using standardized methods is needed to cement the scientific evidence on MP contamination and human exposures.

Seafood is an important source of protein for populations around the world, and it may be necessary 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 to foodborne MPs where possible.”¹

Our demands below are sound and reasonable and are based on a precautionary principle. We demand strict regulations to avoid as much BPA and BPA in a combination with micro and nano particles 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 release of chemicals and related chemicals into the environment may stop, **but acknowledge that strict standards must be put in place to reduce the impact on the environment, ecosystem, food chain and on human health.**

Scientific research must be prioritized where there is a lack of knowledge. An environmental assessment must be conducted before new projects that may cause release of chemicals to the environment. All deployment of epoxy related industries must be halted until proper scientific standards are met to show them safe to the environment, biodiversity and human health. This applies to both production, use and dismantling and deposit of such materials.



¹ <https://ehp.niehs.nih.gov/doi/10.1289/EHP7171>





























































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