

BISPHENOL A – PVC Tech Corp Compliance Summary

Bisphenol A or BPA is a building block of several important polymers and polymer additives used in the production of polycarbonates.

What products contain BPA? Out of the seven classes of plastics used in packaging applications, Bisphenol A can only be found in plastic products marked as follows:



PVC
Some Type 3 Plastics may leach Bisphenol A



OTHER
Some Type 7 Plastics may leach Bisphenol A
This includes:
Acrylic – Acrylonitrile - Butadiene Styrene
Fiberglass - Nylon - Polycarbonate
Polylactic Acid

Bisphenol A is **NOT** used during polymerization or package forming for the following:

Resin Code 1	PET
Resin Code 2	HDPE
Resin Code 4	LDPE
Resin Code 5	POLYPROPYLENE
Resin Code 6	POLYSTYRENE

Therefore, if you DON'T buy PVC plastics or any of those listed under Resin Code 7, then BPA legislation will probably not affect you.

Why is BPA such a hot button issue?

BPA has become increasingly controversial over the last few years due to fears that continued human exposure to BPA would induce chronic toxicity. Particularly with polycarbonate baby bottles exposed to heat and heated liquids that would encourage leaching of BPA into food and drink content. There are added concerns with products that could be mouthed or where contact would enable absorption.

Being an endocrine disruptor, BPA is suspected to have adverse health effects, primarily affecting reproduction. There has also been environmental concern over the risk posed by having BPA leach into landfills and bodies of water, consequently affecting the food chain.

Aside from baby bottles, BPA is not **nationally nor federally** regulated for other products in the United States. Though the FDA formerly deemed BPA to be of not sufficient concern to institute a ban, public uproar over its effects has forced the FDA to revise its position and ban it in baby bottles. Though this decision came at a time when most baby bottle manufacturers had already eliminated BPA in their products.

Is BPA banned anywhere?

In the absence of a uniform and nation-wide regulation in the US, many states have proposed and instituted laws banning BPA in various products. As recently as 2014, the California State Office of Environmental Health Hazard Assessment (OEHHA) listed then promptly de-listed BPA in its PROP 65 chemical list, much to the panic and subsequent relief of industry. Concerns remain that future regulations on this substance and its implementation would present significant obstacles for manufacturers and distributors alike.

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In other countries, specific bans have been made such as:

CANADA	
Health Canada	Canada bans polycarbonate baby bottles containing BPA , and has listed BPA as a toxic substance in Schedule 1 of the Canadian Environmental Protection Act.

EUROPEAN UNION	
EU 321/2011	Bans BPA use in the manufacture of polycarbonate infant feeding bottles.
EFSA (European Food Safety Authority)	Designates a Tolerable Daily Intake (TDI) level of 4 µg/kg (micrograms/kg) of bw/day (body weight/day) per individual. EFSA experts further conclude that the highest estimates for exposure from combined sources (diet, dust, cosmetics and thermal paper) are still three to five times lower than the new TDI.
France	As of January 1, 2015, France has suspended the manufacture, import, export and placing on the market of any packaging, container or utensil containing BPA intended to come into direct food contact.

PVC Tech Corp and BPA:

Regulations concerning BPA continue to evolve as governments at every level attempt to address public concern and take varying scientific assessments into account. This has resulted in numerous products being liberally branded as “BPA Free” – a tag that can ultimately be misleading or even false when products are found with traces of BPA.

The US Federal Trade Commission’s release of its FTC Green Guides for environmental marketing has simplified guidelines on what can or cannot be claimed in branding. Its various enforcement actions has made it clear that false claims or green-washing is not tolerated as more and more companies take advantage of consumer interest in safer and healthier products.

At PVC Tech Corp, we want to perpetuate accuracy and not confusion.

We realize our customers rely on substance disclosures as a basis for future marketing. Thus, we’ve taken a more precise approach by indicating that BPA in specifically engineered films we produce are “low, limited or restricted”.



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Depending on the film requirement, we have and can design custom films significantly limiting BPA to a measure of 1000 ppm (1 mg/kg) or below. This would be for a custom designed film produced to an application and supplied with a third party test.

BPA restrictions are commonly requested for child-safe films where end use products present opportunities for mouthing or hand to mouth contact. Samples of BPA limited films such as these are available for request.

While not stocked through all categories of products, we have the ability to engineer films to specifications that would address this concern in various applications.