**Euro Coop comments on the draft EU Commission Regulation on Bisphenol A in varnishes and coatings and plastics**

**intended to come into contact with food**

September 2017

Euro Coop welcomes the European Commission’s draft Regulation on **Bisphenol A (BPA) in varnishes and coatings as well as in plastics intended to come into contact with food** and the opportunity to comment on it.

Euro Coop - or the European Community of Consumer Co-operatives - brings together the national associations of consumer co-operatives in 19 European countries. Being its members mainly active in the **food retail business**, it has a keen interest in this most topical issue.

Consumer co-operatives were born from the desire to **safeguard consumers’ interests** by providing **quality foods** at **reasonable prices** and represent an entrepreneurial model whose primary goal is to **satisfy consumers’ needs and expectations** rather than to chase absolute profit goals. In this respect, all chemicals policies which affect consumers especially in the food area are of special concern to them.

**Euro Coop policy on chemicals** is basically grounded on the following principles:

* The **precautionary principle**: manufacturers or importers must ensure that any substance which is marketed in the EU does not adversely affect human health or the environment;
* **Consumer protection**: chemicals policy must be comprehensive and follow a life cycle approach, thereby including the phases of consumer use, dispersion and disposal;
* A **full right to know**, including which chemicals are present in products;
* A **phase-out of persistent or bio-accumulative chemicals**;
* A requirement to **substitute less safe chemicals with safer alternatives**;
* **Producer responsibility**: the burden of proof should be placed on producers who would have to prove that a substance is not harmful to the environment in its production, use and disposal;
* A development of **criteria for persistency, bioaccumulation, and toxicity**.

Against this background, many Euro Coop members have since long adopted **full rounded chemicals policies** which also touch upon the use of Bisphenol A. For example, the Basque consumer co-operative **Eroski** **does not use BPA in any of its own-branded products**, the **Swedish Coop has eliminated the use of BPA in receipts** and the **Danish Coop has banned BPA and other bisphenols in June 2016**, replacing them with **epoxy lacquer in cans** in co-operation with the Danish packaging industry association.  As far as the **Finnish consumer co-operative SOK** is concerned, it is in the process of **replacing all own-brand packaging materials containing BPA: the complete substitution** will be finalised by **2018**.

Euro Coop believes that, among the various food contact materials identified by EFSA in the BPA risk assessment, it is essential that **plastics and coatings & varnishes for metal packaging are addressed first** because of their widespread use in the EU market. This is even more important for **metal packaging containing baby foods**, for which it should be mandatory to **avoid any contact between BPA and the food itself.**

Besides these first urgent steps, Euro Coop deems that the final goal should be for the European Commission to come up with a **full-fledged BPA policy which puts environment and consumers’ interests at its core** and ultimately **phase out not only BPA but all bisphenoles**, given the likelihood for those to have similar hormone disrupting effects. This is ultimately even more relevant when – as in these cases - **safer alternatives are already available and represent a viable commercial option.**

**About Euro Coop**

Euro Coop is **the voice of the co-operative retailers in Europe**. Our associations brings together the national associations of consumer co-operatives in 19 European countries, which represent 4,500 local/regional co-operatives, employing 500,000 citizens across Europe and operating 36,000 stores which serve 32 million consumer-members daily. Euro Coop’s members together are Europe’s second strongest retail force – accounting for € 76 billion in annual turnover from sales. Euro Coop’s Secretariat in Brussels represents the interests of its members before the European Institutions and facilitates the inter-member exchange between the national associations. More information is available at [www.eurocoop.coop](http://www.eurocoop.coop).

# For more information, please contact:

# Rosita Zilli – Deputy Secretary-General

[rzilli@eurocoop.coop](mailto:rzilli@eurocoop.coop); Tel: + 32 2 285 00 72