

# Summary of Responses: consultation on the proposal to implement a ban on the use of BPA and its analogues in food contact materials

This consultation was published on 2 October 2025 and closed on 24 December 2025, sought stakeholders view on the proposed implementation of a ban on the use of BPA and its analogues in food contact materials

## Introduction

### Overview

The Food Standards Agency (FSA) conducted a 12-week [consultation on the proposed ban of bisphenol A \(BPA\) and its analogues in food contact materials \(FCMs\)](#) across England and Wales that concluded in December 2025.

Food Standards Scotland (FSS) undertook a parallel consultation process within Scotland at the same time. The main objective of these consultations was to collect both evidence and feedback from stakeholders, thereby supporting regulatory decision-making.

### Objectives

The consultation process focused on several key areas:

- to collate further evidence as available on the health risks associated with BPA and related substances in FCMs
- to examine the practical considerations involved in implementing such a ban, including technical and economic factors
- to encourage stakeholders to comment on any potential exemptions to the ban, ensuring that regulatory measures would be both effective and feasible

### Key areas for stakeholder input

The consultation specifically sought stakeholder input on several key areas relating to the proposed ban on BPA and its analogues in FCMs. Respondents were invited to provide:

- new or emerging scientific evidence regarding the health risks of BPA in FCMs that might challenge the current scientific consensus
- information on the toxicity or health risks of BPA analogues, particularly how these compare to BPA itself
- examples of specific uses of BPA or other bisphenols in FCMs where a ban would cause significant or unavoidable difficulties

- details of industry-led studies or trials, either conducted by respondents or known to them, which demonstrate the feasibility or challenges of replacing BPA and related substances
- views on anticipated obstacles to implementing a ban on BPA and its analogues
- feedback on aligning transitional periods and derogations with those of the European Union
- identification of any possible unintended consequences that could result from the proposed ban
- any additional comments or evidence considered relevant to the proposed ban and its implementation

The intention behind these focus areas was to collect a thorough and balanced range of insights (scientific, operational, and regulatory) from diverse stakeholders. This was to ensure the consultation fully considered both the health risks and the real-world implications of regulating BPA and its analogues in FCMs.

This report offers a concise overview of the feedback, including details about respondents and emphasising common themes and issues. The Annexes contain both a summary of responses and specific comments to open-ended questions.

The FSA wishes to thank all contributors for their valued input.

## **Overview of respondent demographics**

Feedback was gathered from a diverse group of stakeholders, reflecting the breadth of interest and impact associated with the proposed changes to BPA regulations in FCMs.

Respondents included FBOs, manufacturers, trade associations, local authorities, consumers, and several anonymous contributors.

In total, 62 responses were received during the consultation period. The majority of these submissions were made through the online survey platform, accounting for 49 responses. An additional 13 responses were submitted via email. Where email feedback directly addressed questions posed in the online survey, these responses were integrated with the survey submissions to provide a thorough and unified analysis.

Individual consumers were well represented among respondents, with 24 participating through the online survey and a further 2 contributing via email.

Industry stakeholders (organisations, companies and associations) made significant contributions, with 25 responses provided through the online survey and 11 responses sent by email. These also included an organisation sending detailed argumentation and references to support their online response.

This combination of consumer and industry perspectives meant the consultation captured a comprehensive range of views and experiences relevant to the proposed regulatory changes.

## **Thematic analysis**

### **Industry perspective**

Industry stakeholders placed substantial emphasis on the practical and economic challenges associated with moving away from BPA and its analogues. A primary concern identified was the anticipated financial impact, particularly regarding increased costs of production and packaging. These concerns extended across a variety of product categories, with specific mention of items such as bottles, polycarbonate products, chocolate moulds.

Stakeholders highlighted that, for certain categories, identifying and implementing suitable alternatives would present significant technical and financial obstacles.

The transition is expected to affect multiple stages of the supply chain, starting with the procurement of raw materials and extending through to the recycling and end-of-life processing of products. There was particular apprehension expressed about the ability to maintain supply chain integrity during this period of adjustment.

The recycling of materials containing BPA is closely integrated into existing supply chain practices, and respondents cautioned that regulatory changes risk disrupting established recycling streams. This could, in turn, lead to logistical complications, including possible shortages or delays for products that depend on articles made of polycarbonate plastics.

## **Individual respondent views**

Engagement from individual respondents during the consultation process was comparatively limited. Those individuals who did contribute tended to focus on the practical consequences of the proposed shift away from BPA in FCMs. The main themes emerging from their feedback were concerns about the potential increase in costs associated with adopting BPA-free alternatives and apprehensions regarding the safety of replacement materials.

Despite these concerns, individual respondents generally did not provide detailed technical information or any in-depth analysis. Their input reflected a broader sense of uncertainty and caution, suggesting that their views were influenced more by general concerns than by detailed expertise or informed analysis.

## **Scientific evidence and organisational input**

The bulk of scientific evidence and detailed commentary within the consultation originated from organisations, which accounted for approximately 60% of the substantial and technically informed responses. These organisations tended to deliver a more comprehensive and nuanced feedback, frequently referencing relevant trials, peer-reviewed studies, and technical datasets to support their positions. Their submissions contributed significantly to the evidentiary base informing the consultation, reflecting a high level of engagement with scientific and regulatory literature.

Responses from individual participants either answered “No” to questions regarding scientific evidence or left such queries unanswered. Some of the individual respondents deferred to the expert assessments provided by bodies such as the European Food Safety Authority (EFSA), the German Federal Institute for Risk Assessment (BfR), and the UK Committee on Toxicity (COT).

Nonetheless, some individuals did highlight what they saw as inconsistencies in tolerable daily intake (TDI) values across these authorities and called for ongoing scientific review to ensure regulatory decisions remain current and robust.

There was widespread agreement among respondents that analogues of BPA, such as BPS and BPF, may present similar health and safety risks.

Many advocated for these substances to be included within the scope of the proposed ban to prevent the possibility of regrettable substitution, where one hazardous chemical is replaced by another with comparable risks.

Certain industry stakeholders emphasised the need for clearer definitions and scope when referencing “hazardous bisphenols”. They cautioned against the imposition of unnecessary restrictions on substances that have established safety records, seeking greater specificity in regulatory language to avoid unintended consequences for industry and consumers.

## **Unintended consequences**

Organisations raised significant concerns regarding the potential unintended consequences that could arise from implementing a ban on BPA. A primary issue identified was the risk that replacement materials or substitutes such as other bisphenols or plasticisers may not necessarily present a safer alternative.

This raises the possibility that the intended health benefits of the regulation could be compromised if substitute chemicals do not offer improved safety profiles.

Beyond health considerations, stakeholders also pointed to a number of practical and economic risks. These included the potential for disruptions to established supply chains, increased production and operational costs, and the risk of product shortages affecting a range of goods. The prospect of such disruptions was viewed as especially concerning for industries heavily reliant on polycarbonate plastics and related materials.

Another key theme highlighted by some stakeholders was the need to align any regulatory changes with broader circular economy objectives. There was an emphasis on ensuring that recycled materials are not unfairly disadvantaged as a result of the ban, and that adequate infrastructure is in place to manage any increase in waste resulting from the transition to alternative materials.

Individual respondents echoed many of these organisational concerns, particularly regarding the potential for increased costs associated with BPA-free alternatives.

Furthermore, they expressed significant uncertainty about the effectiveness and safety of substitute materials. This group's feedback reflected a preference for a cautious approach, advocating for further evidence and evaluation before enacting major regulatory changes.

## **Implementation (guidance, timelines, and derogations)**

Respondents consistently emphasise the importance of the FSA issuing clear and practical compliance guidance to support the effective implementation of the proposed BPA ban. They call for comprehensive documentation that includes unambiguous definitions, established detection limits, and specific advice on the management of transitional stock. Such guidance is viewed as essential to ensure that all stakeholders have a precise understanding of regulatory requirements and can plan accordingly.

There is broad consensus that transition periods should be carefully calibrated to reflect the realities of product lifecycles and complex supply chain processes. Several respondents advocate for transition periods that allow sufficient time for adaptation, with some explicitly supporting the introduction of extended grace periods or specific derogations for critical uses. Notably, applications such as polycarbonate moulds, filtration membranes, and large containers are highlighted as areas where additional flexibility may be necessary due to the current lack of viable alternatives.

Within the manufacturing and supply chain sector, there is considerable support for targeted derogations for applications deemed sector critical. Respondents request that the FSA establish clear eligibility criteria and require robust evidence of compliance for such exceptions. Additionally, some propose the introduction of migration limits for BPA in specific cases where suitable alternative materials are not yet available, as a pragmatic interim measure to facilitate continued operation while safeguarding public health.

## **Key Insights from Consultation Responses**

## **Strong support for the ban, but concerns about substitutes**

Most respondents, especially private individuals, support the proposed BPA ban for health reasons.

There is a recurring concern that banning BPA may lead to the use of alternative chemicals (such as other bisphenols or plasticisers) that are less well-studied and could also pose health risks.

## **Significant technical and economic challenges for industry**

Organisations and industry representatives highlight substantial technical, economic, and supply chain challenges in implementing the ban.

These include the lack of suitable alternatives for certain uses (for example polycarbonate bottles), increased costs, the need for new testing and certification, and potential disruption to supply chains, especially for small medium enterprises (SMEs).

## **Unintended consequences and need for phased transition**

Many responses mentioned the risk of unintended consequences, such as increased costs for consumers, product shortages, and environmental impacts from premature disposal of existing materials.

There is a strong call for a phased or extended transition period, alignment with EU regulations, and clear technical guidance to ensure a smooth and safe implementation.

Some stakeholders highlight the need to balance the ban with circular economy goals, ensuring that recycled materials are not unduly penalised and that infrastructure is in place to manage increased waste.

## **Divergent stakeholder views**

Some industry groups and individuals argue that the evidence does not support a blanket ban, especially given the lack of consensus among international authorities and the proven safety record of certain BPA applications (for example polycarbonate drinkware, coatings) and alternatives that have already been assessed for their safety. A few respondents note that the UK and EU are out of step with other major markets (for example United States of America, China, Japan), where BPA is still permitted in many applications.

They caution against measures that could undermine UK competitiveness or create trade barriers.

The responses reflect broad support for the proposed BPA ban and regulatory alignment with the EU.

They also highlight significant technical, economic, and practical challenges. Stakeholders urge the FSA to adopt a proportionate, evidence-based approach, with clear guidance, realistic transition periods, and targeted derogations to ensure consumer safety, business viability, and environmental sustainability.

There is a strong call for ongoing engagement with industry, regular review of scientific evidence, and support for innovation in safer alternatives.

## **Summary table of stakeholder positions**

The consultation process brought together a diverse range of stakeholders, each offering distinct perspectives and recommendations on the proposed ban. Their positions and associated concerns are summarised in the table below:

Sector	Stakeholder	Position on Ban	Key Concerns/Recommendations
Industry Group & Associations	Food and Drink Federation (FDF), British Soft Drinks Association (BSDA), British Beer & Pub Association (BBPA), British Coatings Federation (BCF), Natural Source Water Association (NSWA), British Retail Consortium (BRC) Metal Packaging Manufacturers Association (MPMA), The Association of Manufacturers of Domestic Appliances (AMDEA), Ella's Kitchen & Alupro	Expressed support for the ban	Emphasised on the importance of aligning with EU standards. They advocated for realistic implementation timelines and called for sector-specific derogations to accommodate industry needs. Additionally some stressed on the necessity for ongoing monitoring throughout the transition. Their recommendations included dedicated support for SMEs, guidance and flexibility in cases involving complex uses.
Industry Group & Associations	Water Hydration Association (WHA), Best Water Technology UK (BWT UK), Water at Work, Eden Springs, Countrywise Water Coolers	Expressed support (with caveats)	Requested a longer phased transition to facilitate adaptation. They highlighted the need for additional support for small and medium-sized enterprises (SMEs) and improvements to recycling infrastructure.
Industry Group & Associations	British Plastics Federation (BPF), Federation of the European Cookware Cutlery and Houseware Industries (FEC)	Conditional support for alignment, with flexibility	Highlighted ongoing scientific disagreement (EFSA vs BfR/COT); supports EU alignment where it makes sense but advocates flexibility: targeted derogations, transition periods, careful handling of recycled content and concerns about alternatives.
Reusable Tableware & Drinkware Manufacturers	British Bung Manufacturing Co. Ltd	Oppose with concerns	Strongly opposes ban on polycarbonate drinkware; cites safety benefits (injury prevention), durability, lack of alternatives and environmental impacts.
Manufacturers and Component Suppliers	Plastics Europe, Bisphenols Europe, Harfield Components, European Phenolic Resins Association (EPRA)	Opposed or conditionally supported the ban	Raised concerns about the scientific foundation of the proposal and potential divergence from global standards. Additional issues raised included the safety record of current practices and the anticipated economic impact on their sectors with some requesting explicit exclusions of bisphenols used as intermediaries in resin manufacture.
Manufacturers and Component Suppliers	Coalition of membrane manufacturers – represented by Keller and Heckman LLP	Conditional support (derogations essential)	Recommend explicit UK derogations for polysulfone (PS) assemblies (BPA), polyethersulfone (PES) membranes (BPS) and BPA/BADGE epoxy in large containers and components. Provided quantitative exposure showing de minimis migration and major food safety/security impacts if removed.
Advocacy and Research Organisations	Food Packaging Forum (FPF), CHEM Trust, Fidra	Strong Support for a group wide ban	Recommended robust enforcement to prevent regrettable substitution of harmful materials and comprehensive action across the sector
Safety Assessed bisphenol alternative - Tetramethyl bisphenol F diglycidyl ether (TMBPF-DGE)	Sherwin Williams	Opposes a blanket ban	In regard to the chemical TMBPF-DGE which is presented as a scientifically validated, approved, and industry-ready alternative to BPA-based epoxies. The response calls for a risk-based, evidence-driven approach to regulation, ensuring that safe alternatives like TMBPF-DGE remain available and are not inadvertently swept up in broad bans targeting the bisphenol class as a whole.
Sector specific Stakeholders	Chocolate and Confectionery Industry - Hames Chocolates, JRM Products LTD, Muller Dairy UK	Conditional support	Concerned due to lack of alternative materials. Requested for specific derogations and extended timelines to facilitate compliance.
Sector specific Stakeholders	Packaging and Recycling Sector – Alpla UK Ltd	Conditional support for the ban	Sought clarity regarding the use of recycled materials. Their concerns also included intentional use and development of reliable detection methods

General public	Private individuals	Mostly support the ban	Raised concerns on prioritising health and advocated for strict enforcement. However some scepticism was noted within this group.
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The perspectives gathered show there is broad agreement on the justification for introducing the proposed ban. However, they also highlight the necessity for a carefully managed transition period.

This is essential to ensure that the implementation of the ban does not result in unintended negative consequences for industry stakeholders, consumers, or the wider environment.

## Conclusion

The consultation process has ensured that all responses, whether from organisations or individuals, have been given due consideration. The feedback received encompasses both detailed, evidence-based submissions and more general expressions of concern, each of which has informed the subsequent stages of regulatory development.

In developing the final recommendations, careful consideration was given to every perspective received during the consultation. This inclusive approach demonstrates a strong commitment to thoroughness and fairness, ensuring that all stakeholder views contributed to the outcome.

## Next steps

Based on the findings of the analysis, a ban will be introduced on the use of BPA and its analogues in FCMs in Great Britain. The timing of this implementation will be communicated in due course.

The FSA will continue to engage with stakeholders to support awareness and readiness for any new requirements. This engagement will inform guidance and support proportionate implementation.