

# Consultation on the proposal to implement a ban on the use of bisphenol A (BPA) and other bisphenols in Food Contact Materials.

This consultation seeks views, comments and feedback from stakeholders on our proposal to implement a ban on the use of bisphenol A (BPA) and other bisphenols in food contact materials (FCMs). The responses received will provide evidence that will be used to seek a formal decision on the status and use of BPA and its analogues in FCMs.

Launch date: 2 October 2025

Respond by: 24 December 2025

#### This consultation will be of most interest to

All England, Wales, and Northern Ireland food businesses, local and port health authorities, district councils, food and packaging manufacturers, retailers and distributors, importers and exporters, consumer safety and health advocacy groups, scientific and academic experts, and the general public.

# Purpose of the consultation

The purpose of this consultation is to seek views on the proposed implementation of a ban on bisphenol A (BPA), other bisphenols, and derivatives in food contact materials. This consultation is not intended to revisit the scientific consensus on BPA's risks, but to gather any robust, peer-reviewed evidence that may justify an alternative approach for BPA and its analogues. The consultation will also help identify any practical considerations for implementation, including transition periods and potential exemptions, while setting a high evidentiary threshold for any objections.

# How to respond

Responses to this consultation should be <u>submitted via the online form</u>. If this is not possible, you can email a response to: <u>FCM-BPA@food.gov.uk</u>

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#### **Definitions**

The following definitions apply for the purposes of this consultation

**Regulated Products** are certain food, feed products and food contact materials that must go through a risk analysis process and require authorisation before they can be sold in the UK. More information about the application process, including the risk analysis and risk management processes and ministerial involvement can be found at:

Background on placing a regulated product on the market.

**Food contact materials (FCMs)** are materials and articles which, in their finished state, are intended to be brought into contact with food, or are already in contact with food and are intended for that purpose.

This includes materials and articles that:

- Are intended to come into contact with food (e.g. packaging, containers, kitchenware).
- Are already in contact with food and are intended for that use.
- Can be reasonably expected to come into contact with food under normal or foreseeable conditions of use.

Food contact materials authorisation guidance

The Food and Feed Safety and Hygiene Provisional Common Framework is a non-statutory arrangement between the UK Government and Devolved Governments (Scotland, Wales and Northern Ireland) to establish common approaches to policy areas where powers have returned from the EU within areas of devolved competence. This consultation has been developed under the commitments to collaborative UK four-nation working set out in this framework. As such, this consultation has taken a four-nation approach bearing in mind the Windsor Framework arrangements that apply in Northern Ireland. Therefore, the final recommendations will be agreed before being presented to Ministers for a final decision. Northern Ireland continues to fully participate in the risk analysis processes concerning food and feed safety, reflecting Northern Ireland's integral role within the UK and ensuring that any decisions made fully consider the potential impacts on the whole of the UK.

**Transitional Periods** refer to timeframes during which new regulatory requirements are phased in, allowing affected stakeholders—such as businesses, manufacturers, or consumers—time to adapt to the changes before full compliance becomes mandatory. In the context of FCMs transitional periods serve to:

- Bridge the gap between old and new legal requirements,
- Minimise disruption to supply chains and market operations,
- Allow time for reformulation, testing, and certification of compliant materials,

- Prevent waste by enabling the continued use or sale of existing stock,
- And ensure a smooth, proportionate implementation of public health protections.

# Windsor Framework - For goods eligible for Northern Ireland Retail Movement Scheme (NIRMS):

- In October 2023, the Windsor Framework was implemented providing a unique set of arrangements to support the flow of foodstuffs including food contact materials from Great Britain to Northern Ireland.
- These goods can meet the same standards applied in the rest of the UK in public health, marketing (including labelling) and foodstuffs when moving through the Northern Ireland Retail Movement Scheme (NIRMS).
- Goods authorised in Great Britain can be moved into Northern Ireland through the Northern Ireland Retail Movement Scheme.
- The FSA remain committed to ensuring that consumers across the UK can be confident that food is safe and is what it says it is, even where rules applicable to the same type of food may be slightly different.

**Safety Assessment** – FSA Risk Assessors deliver the science behind our advice. They are responsible for identifying and characterising hazards and risks to health and assessing exposure levels.

**Risk Management** - Policy advisers are responsible for the risk management outputs which include considerations and decisions for managing risks in a way that aligns with public health goals, legal obligations, and socio-economic considerations.

**Bisphenols** – A group of chemical substances related in their structure to diphenylmethane (CAS 101-81-5) with two phenyl carbon rings - hence "bis (two) - phenol." The bisphenols include chemicals referred to as BPA, BPS and BPF, which are bisphenol reacted with different chemicals to change the overall structure and the resulting chemical's useful properties.

**Bisphenol A (BPA)** – This is the colloquial name for the chemical 2,2-bis(4-hydroxyphenyl) propane, with the identifying CAS number 80-05-7. It is Substance 151 authorised under assimilated Regulation 10/2011 on plastic materials and articles intended to come into contact with food.

**Bisphenol S (BPS)** - This is the colloquial name for the chemical 4,4'-dihydroxydiphenyl sulphone, with the identifying CAS number 0000080-09-1. It is Substance 154 authorised under assimilated Regulation 10/2011 on plastic materials and articles intended to come into contact with food.

**Bisphenol F (BPF)** - This is the colloquial name for the chemical Bis(4-hydroxyphenyl)methane with the identifying CAS number 620-92-8

**BPA Analogues** - refers to chemically related substances that share a similar core structure to BPA and may exhibit comparable hazardous properties.

## Introduction and rationale for the proposed ban

- 1. Bisphenol A (BPA) has been widely used in the manufacture of various food contact materials (FCMs), including varnishes, coatings, adhesives, and polycarbonate plastics. Its primary applications include lining metal packaging such as cans and lids and producing durable food storage equipment and reusable drink containers. BPA's strength, durability, and heat resistance have made it a popular material in the food industry for decades.
- 2. However, long-standing concerns about its potential health effects particularly its impact on male reproductive health and the immune system have led to sustained scientific scrutiny and regulatory review. In recent years, the safety of BPA has been extensively assessed by several regulatory bodies, including the European Food Safety Authority (EFSA) and the German Federal Institute for Risk Assessment (BfR). These reviews highlighted significant risks associated with BPA exposure, prompting tighter regulations across Europe.
- 3. In the UK, the Food Standards Agency (FSA) have also evaluated the safety of BPA through the independent Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT). COT reviewed the scientific basis for EFSA's revised tolerable daily intake (TDI) for BPA and the BfR's 2023 assessment. In June 2024, COT published a position paper confirming concern about BPA's effects on the immune and reproductive systems and noting that the new TDI is extremely low that it may be difficult to achieve in practice under current usage conditions.
- 4. Although COT has not yet conducted a full assessment of BPA analogues and derivatives, these substances are structurally similar and are increasingly associated with comparable health risks. As a precautionary measure, the FSA recommends that any regulatory action should also encompass these related substances to prevent harmful substitution.

# **Regulatory Context and proposed Action**

- 5. In response to the growing body of evidence, the European Union (EU) adopted Commission Regulation (EU) 2024/3190, which prohibits the use and trade of BPA, its salts, other hazardous bisphenols and hazardous bisphenol derivatives in a wide range of food contact materials. This includes epoxy resins used in metal food and drink cans, durable plastics in reusable bottles, and other common applications. The regulation came into force in January 2025 and includes an 18-month transition period for most products to allow industry time to adapt. Under the Windsor Framework, this regulation applies in Northern Ireland.
- 6. In light of the available scientific evidence and policy options considered, the FSA preferred option is recommending a ban on the use of BPA and its analogues in

FCMs (**Option 3**). This decision follows a thorough evaluation of three main options (expanded policy options included in **Annex A**):

- **Option 1**: Taking no immediate action, which would maintain the status quo but fail to address known health risks.
- Option 2: Banning BPA only, which could lead to substitution with similarly harmful analogues.
- **Option 3**: Banning both BPA and its analogues, which offers the most comprehensive protection for public health and aligns with international regulatory developments.
- 7. The recommended approach reflects the precautionary principle and aims to prevent harmful substitution, ensure regulatory consistency across the UK and EU/Northern Ireland, and support industry in transitioning to safer alternatives.
- 8. Launching this consultation is the first formal step in the legal process to consider removing BPA as an authorised substance. To ensure consistency and protect public health across the UK, the FSA are proposing an approach that aligns with the EU's regulatory action. This would prevent the substitution of BPA with similarly harmful chemicals and avoid the risk of our internal markets becoming a destination for non-compliant FCMs that are banned elsewhere due to safety concerns. It would also support industry by providing clarity and a harmonised regulatory framework across the UK.

## **Proposed Ban**

- 9. The proposed ban is expected to prohibit the use of BPA and its analogues in the manufacture of FCMs such as plastics (e.g. reusable containers and kitchenware), varnishes and coatings (e.g. in metal cans), adhesives, printing inks, rubber, silicones, ion exchange and resins.
- 10. The proposed ban will apply to all newly manufactured FCMs containing BPA or its analogues. To support a smooth transition, we propose to adopt similar transitional periods with the same transition end date equivalent to those set out in the EU regulation. These would allow the continued sale of compliant products manufactured before the ban, permit the use of existing stock for a defined period to minimise disruption, and provide extended timelines for specific uses where no safe alternatives currently exist—such as in certain filtration membranes. These measures are designed to strike a balance between protecting public health and allowing industry sufficient time to adapt.

# **Next Steps**

11. This consultation outlines a clear proposed path toward the prohibition of BPA in FCMs. We welcome submission of robust evidence that may support an alternative approach. We deeply value the insights and expertise of stakeholders, whose contributions play a vital role in shaping evidence-based, balanced, and

- effective policy decisions. Your engagement in this process is essential to ensuring that all perspectives are considered.
- 12. Following the consultation, and taking into account the evidence and views submitted, we will implement both administrative and legislative measures in parallel. Administrative measures will be taken in accordance with Article 12 (1)-(4) of assimilated <a href="Regulation 1935/2004">Regulation 1935/2004</a> to modify the plastics register specifically by removing BPA and its analogues from the list of authorised substances. At the same time, a Statutory Instrument (SI) will be drafted to amend Article 6 of assimilated <a href="Regulation 10/2011">Regulation 10/2011</a>. This amendment will introduce a new paragraph enabling transitional measures (e.g. those outlined in **Annex B**), derogations (as outlined in **Annex C**), and the revocation of assimilated <a href="Regulation 2018/213">Regulation 2018/213</a>, which currently governs the use of BPA in coatings and adhesives in food contact materials. These changes will be subject to Ministerial approval as part of the legislative process. For transparency, a proposed timeline for this work is included in **Annex D** (these are provisional timelines and may be subject to change).

#### **Impacts**

- 13. As part of the risk analysis and risk management process, the FSA has assessed the potential impacts that would result from these proposals. The potential impacts considered included those most frequently identified when introducing or amending food law (i.e. environmental, trade, political, societal, technical feasibility, and consumer interests) **Annex A.**
- 14. We foresee no requirement for an impact assessment based on COT's review of the most recent toxicological data on BPA. The findings reinforce growing concerns about BPA's potential to disrupt the endocrine system and negatively affect reproductive health, particularly with prolonged exposure. This scientific consensus provides a robust foundation for considering regulatory measures to prohibit the use of BPA in FCMs.
- 15. We are applying the precautionary principle in light of scientific evidence indicating a potential risk to human health. This principle supports timely regulatory intervention to protect public health, even where a comprehensive socio-economic impact assessment may not yet be available, particularly when the potential for harm is substantiated by credible scientific evidence.
- 16. We are proposing to proceed with a ban on BPA and its analogues with a view of introducing transitional measures and timelines similar to those which apply in the EU and Northern Ireland to support industry adaptation. These will include phased implementation timelines and exemptions for specific uses where no safe alternatives exist. These steps are intended to minimise economic and supply chain disruptions while maintaining a high level of consumer safety.

17. The proposed implementation of the ban is expected to have minimal impact on businesses, as most manufacturers are already moving away from the use of BPA in food contact materials. While costs may arise from reformulation and compliance activities, these are anticipated to be manageable. Benefits include improved public health outcomes, regulatory alignment, and increased consumer trust. Transitional measures may help ease any short-term burden on businesses by providing time to adapt; however, it is expected that many will have already reformulated or taken steps to comply, and therefore the expiry of certain transitional periods (see **Annex A**) is unlikely to result in significant disruption.

## **Engagement and Consultation Process**

- 18. The following questions are designed to gather targeted feedback from stakeholders on the proposed ban of BPA and its analogues in FCMs. The consultation aims to support the implementation of this ban by identifying any robust, peer-reviewed evidence that may justify an alternative approach, as well as understanding the practical implications for industry and consumers.
- 19. We welcome detailed, evidence-based responses to the questions below. The consultation is intended to ensure a transparent, science-led process while supporting a smooth and informed transition for all affected sectors.
- 20. Following the consultation process, responses will be made available on the FSA website and shared with ministers.

#### Questions asked in this consultation:

- 1. Do you have any new scientific evidence that could support a different approach from the current scientific consensus on the health risks of BPA in food contact materials? If so, please provide full references and a summary of the findings.
- 2. Do you have any new scientific evidence regarding the toxicity or health risks of BPA analogues used in food contact materials, especially in comparison to BPA? (Please provide full references and a summary of findings.)
- 3. Are there specific uses of BPA or other bisphenols in food contact materials where a ban would present significant and unavoidable challenges?

  (If so, please provide detailed evidence and justification.)
- 4. Have you conducted or are you aware of any industry studies or trials that demonstrate the feasibility or challenges of transitioning away from BPA and related substances? (Please share findings, including timelines, costs, and outcomes).
- 5. What challenges do you foresee in implementing a ban on BPA and related substances? (Please describe any technical, economic, or supply chain issues).
- 6. We are intending to align our transitional periods and derogations with those of the EU (as outlined in Annex B) to help prevent the UK market from being flooded with non-compliant products. Do you have any objections to this proposed approach?
- 7. Do you foresee any unintended consequences (e.g. increased use of other harmful substances, cost burdens, or product shortages) resulting from a ban?
- 8. Do you have any other additional comments or evidence relevant to the proposed ban and its implementation?

# Responses

21. Responses are required by close **24 December 2025 at 17:00**. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).

- 22. Please submit responses via the <u>online survey form</u>. If this is not possible, you can email a response to: <u>FCM-BPA@food.gov.uk</u>
- 23. We aim to publish a summary of responses to this consultation within 3 months of the consultation closing.
- 24. A summary of responses will be made available to share with ministers in England and Wales.
- 25. For information on how the FSA handles your personal data, please refer to the Consultation privacy notice at <a href="https://www.food.gov.uk/about-us/privacy-notice-consultations">https://www.food.gov.uk/about-us/privacy-notice-consultations</a>.

#### **Further information**

- 26. If you require a more accessible format of this document, please send details to the named contact for responses to this consultation and your request will be considered.
- 27. This consultation has been prepared in accordance with <a href="HMG Government">HM Government</a> consultation principles.
- 28. Thank you on behalf of the Food Standards Agency for participating in this public consultation.

#### **Food Contact Materials Team**

# **Annex A: Background**

Bisphenol A (BPA) has been widely used in the manufacturing of various food contact materials, including varnishes, coatings, and polycarbonate plastics. Its primary applications include lining metal packaging, such as cans and lids, and producing large-scale food storage equipment. BPA's ability to create strong, durable, and heat-resistant materials made it a popular choice in the food industry. However, long-standing concerns about its potential health effects, including its impact on male reproduction and the immune system, have led to sustained scrutiny and regulatory reviews.

In recent years, the safety of BPA has been extensively reviewed by several regulatory bodies, including the European Food Safety Authority (EFSA) and the German Federal Institute for Risk Assessment (BfR). These reviews highlighted the potential risks associated with BPA exposure, leading to stricter regulations in Europe. The FSA following its own risk analysis process, has also evaluated the safety of BPA through the independent UK Committee on Toxicity of Chemicals in Food, Consumer products and the Environment (COT). The COT reviewed the scientific basis and implications for risk management of the new EFSA Tolerable Daily Intake (TDI) for BPA, and the subsequent assessment of BPA by the BfR in 2023. A position paper on BPA was published in June 2024 explaining COT's approach. The other bisphenols and bisphenol derivatives were not included in the COT safety assessment; however, the wider bisphenol family are considered typically to be highly structurally related to BPA and so raise similar concerns as those for BPA. The COT played a crucial role in assessing the scientific evidence and recommending precautionary measures.

The EU has since adopted <u>Commission Regulation 2024/3190</u>, prohibiting BPA, other hazardous bisphenols and hazardous bisphenol derivatives in FCMs. This regulation came into force in January 2025 and applies in Northern Ireland under Windsor Framework arrangements. Following this the FSA proposes an approach geared at preventing substitution with similarly harmful chemicals and to align with the latest scientific evidence, thereby enhancing consumer protection UK wide.

#### **Northern Ireland Position**

The EU recently announced a ban on BPA and other similar bisphenols, effective from January 2025. This ban prohibits the use of BPA and other chemicals in the wider bisphenol family in various food contact materials such as plastics, coatings, adhesives, and more. Commission Regulation (EU) 2024/3190, specifically bans the use and trade of BPA, its salts, and other hazardous bisphenols in food contact materials across the EU. This includes items like epoxy resins for coatings in metal food and drink cans, and durable plastics for reusable drink bottles. For most products there is an 18-month transition period to allow industry time to adapt to the changes. Under Windsor Framework arrangements, this ban on BPA applies in Northern Ireland.

# **Policy Options – Considerations**

Option	Summary	Implications	Risk Management Assessment
Option 1: Taking No Immediate Action	Maintain the status quo; allow continued use of BPA and its analogues in food contact materials.	Public Health: Fails to mitigate known health risks (e.g. endocrine disruption, reproductive toxicity) and undermines our commitment to high food safety standards. Regulatory Lag: We will fall behind international developments (e.g. EU) risking misalignment with key trading partners. Reputational Risk: May erode public trust in regulatory responsiveness. Trade Considerations: Potential friction with stricter trading partners.	Low intervention, high residual risk. May be defensible only as a temporary holding position pending further evidence or stakeholder input is needed before action.
Option 2: Banning BPA Only	Prohibit the use of BPA in food contact materials but allow continued use of structurally similar analogues (e.g. BPS, BPF).	Partial Risk Reduction: BPA risks addressed, but analogues may pose similar hazards. Scientific Uncertainty: Analogues show endocrine-disrupting potential in emerging studies. Regulatory Inconsistency: May appear incoherent if analogues are later restricted, requiring further policy revision.	Moderate intervention, but risk displacement rather than elimination. May be viewed as a short-term compromise, not a long-term solution.
Option 3: Banning BPA and Its Analogues (Preferred Option)	Prohibit BPA and structurally similar analogues in food contact materials.	Comprehensive Risk Mitigation: Strongest protection for public health and consumer confidence Regulatory Alignment: Aligns with precautionary approaches in the EU, Canada, and others, supporting trade	High intervention, high public health benefit. Supports a precautionary principle approach.

continuity. Innovation Incentive: Encourages industry to invest in safer, sustainable alternatives. Implementation Challenges: Requires stakeholder consultation, and transitional	

# **Impacts**

The table below summarises the key impacts considered in the proposed ban of BPA and its analogues in food contact materials:

Impact Area	Key Considerations		
Environmental	<ul> <li>Reduces environmental contamination from BPA disposal and manufacturing.</li> <li>Supports circular economy by allowing use of existing stock to avoid waste.</li> </ul>		
Trade	<ul> <li>Aligns with EU/Northern Ireland regulations to ensure market consistency. Divergence could lead to trade barriers, increased compliance costs, and market fragmentation.</li> <li>Prevents our internal markets from becoming a destination for non-compliant products.</li> </ul>		
Technical Feasibility	<ul> <li>Industry is already transitioning away from BPA.</li> <li>A ban could accelerate innovation in safer materials but may also impose short-term costs for SMEs</li> <li>Derogations provided for uses where alternatives are not yet viable.</li> <li>Phased timelines support reformulation and compliance.</li> </ul>		
Consumer Interest	<ul> <li>Protects public health based on scientific evidence of BPA's risks.</li> <li>Applies precautionary principle to enable timely intervention.</li> </ul>		

#### **Annex B: Transitional Measures**

# FSA Considerations for adopting Transitional Periods and Derogations similar to those in the EU (applicable in Northern Ireland)

In light of the EU adoption of <u>Regulation (EU) 2024/3190</u>, which restricts the use of BPA and related substances in FCMs, the FSA recognises the importance of maintaining high standards of public health protection while ensuring regulatory coherence for businesses operating across both UK and EU markets.

To this end, we are proposing to adopt similar transitional periods with the same transition end date equivalent to those set out in the EU regulation. This will provide a structured and risk-based approach to implementation. While some of the transitional period may have expired by the time we implement the ban, it is expected that most businesses will have already reformulated, and the market will largely have come into compliance.

Implementation will proceed following a Ministerial decision, ensuring that any regulatory changes are made with appropriate oversight and in line with domestic policy processes.

The transitional measures are designed to:

- Ensure consistency for businesses operating across GB, NI and EU markets, reducing the risk of conflicting requirements.
- Provide clear timelines for industry to plan reformulation, procurement, and compliance activities.
- Prevent businesses from having to meet two different sets of rules for similar products, reducing administrative and financial strain.
- Avoid unnecessary disposal of stock that becomes non-compliant in the EU and NI but remains usable in GB, supporting circular economy goals.
- Allow similar timelines for the development, testing, and approval of safer alternatives, particularly in complex or high-risk applications.
- Balance the need to protect public health with the practical realities of supply chains, manufacturing cycles, and infrastructure replacement.

The following table outlines the proposed transitional periods for various categories of FCMs, along with the rationale for each provision.

Material Type / Use Case	Transitional Deadline	Legal Basis	Rationale	Adaptation
Single-use final food contact articles manufactured with BPA	20 July 2026	Article 11(1)	Allows continued market placement of compliant articles until this date to support reformulation	While this transitional period may have expired by the time the ban is implemented, it is expected that most businesses will have already reformulated,

			and inventory clearance.	and the market will largely have come into compliance.
Single-use articles for preservation of fruits, vegetables, or fishery products	20 January 2028	Article 11(2)(a)	Recognises technical challenges in replacing BPA- based coatings in acidic or oily food applications.	We may consider maintaining this extended deadline to support innovation and ensure continuity in supply chains. If implementation occurs after this date, the expectation remains that industry will have largely reformulated.
Single-use articles with BPA-based coatings applied only to the exterior metal surface	20 January 2028	Article 11(2)(b)	Migration risk is minimal due to external application; extended deadline supports gradual phase-out.	We may adopt this provision to reflect low exposure risk and allow time for reformulation of niche applications. As with other categories, the market is expected to have largely come into compliance by the time of implementation.
Repeat-use final food contact articles manufactured with BPA	First placement: 20 July 2026 Market presence: until 20 January 2029	Article 12	Reflects long lifespan and high replacement costs of durable equipment used in food production.	We are likely to align with this timeline to avoid unnecessary economic burden and logistical disruption. Even if the transitional period lapses before implementation, most businesses are expected to have taken steps to comply.

# **Annex C: Derogation**

While the general rule is to ban the use of BPA and its analogues in FCMs, specific derogations i.e. limited exceptions are also included. The derogations are designed to accommodate critical uses where no viable alternatives currently exist and where risk can be tightly controlled.

#### **Key Derogations**

Use Case	Material Type	Conditions for Derogation	Rationale
Polysulfone filtration membrane assemblies	Plastics	BPA may be used as a monomer or starting substance. Migration must be non-detectable (limit: 1 µg/kg). Final articles must be cleaned and flushed before food contact.	These membranes are used in critical filtration systems (e.g. dairy, beverages) where BPA-free alternatives are not yet technically feasible.
Liquid epoxy resins for large containers	Varnishes and coatings	BPA may be used in self- supporting FCMs or articles with a capacity >1000 litres. Same migration and cleaning conditions apply.	These are typically industrial-scale tanks used in food processing. Replacing them would be economically and logistically burdensome.

#### **Additional Notes on Derogations**

These derogations are not blanket exemptions. They are conditional on:

- Strict migration limits (non-detectable at 1 μg/kg),
- Pre-use cleaning of the final article,
- Use only in specific, controlled applications.

# **Annex D: Proposed Timeline for BPA Ban**

Milestone	Estimated Date	Details
Consultation launch	2 October 2025	Public consultation opens on the proposed ban of BPA and related bisphenols in food contact materials (FCMs), including scope, derogations (Annex B), and transitional measures.
Consultation closes	24 December 2025	12-week consultation period ends. Stakeholder responses reviewed and summarised.
Policy finalisation	January – February 2026	Final policy position agreed, incorporating consultation feedback. Timed to avoid overlap with pre-election periods in devolved administrations.
Administrative measures	February – March 2026	FCM plastics register updated to remove BPA and structurally related bisphenols and reflect any derogations.
Drafting of Statutory Instrument (SI)	March – May 2026	SI prepared to: amend Article 6 of assimilated Regulation 10/2011, insert derogation clause, and revoke assimilated Regulation 2018/213. Drafting may be paced to accommodate devolved government election cycles.
Ministerial approval & SI laid	June – July 2026	SI laid before Parliament following Ministerial sign- off. Timing may be adjusted to ensure engagement with new Ministers post-election in Wales.
Entry into force	Mid to Late 2026	Ban takes effect, with transitional measures included in the SI to allow industry time to comply. While some EU transitional deadlines may have passed, it is expected that most businesses will have already reformulated, and the market will largely have come into compliance.

#### This timeline ensures:

- A single-phase legislative process, consistent with the EU approach.
- Sufficient time for consultation analysis, policy refinement, and legislative drafting.

• A clear path to ministerial decision-making and implementation.

**To note** that this is a provisional timeline and may be subject to change, as some of the estimated dates and actions may lapse or shift depending on evolving policy priorities and implementation timelines.

# **Annex E: List of interested parties**

Metal Packaging Manufacturers Association (MPMA)

Department for Environment, Food & Rural Affairs (Defra)

Department of Health and Social Care (DHSC)

British Plastics Federation (BPF)

British Coatings Federation (BCF)

British Retail Consortium (BRC)

Food and Drinks Federation (FDF)

British Soft Drinks Association (BSDA)

ChemTrust

**Breast Cancer UK** 

Fidra

Campden BRI

Plastics Europe

**UK Committee (COT)** 

Food Contact Materials Joint Expert Group (FCMJEG)

**Crown Packaging** 

#### **Wales**

Welsh Government

Food and Drinks Federation Cymru

**British Retail Consortium** 

Zero2Five Food Industry Centre

Food Technology Centre

**Food Centre Wales** 

#### **Northern Ireland**

The Northern Ireland Executive

Northern Ireland Food and Drink Federation

NI Retail Consortium

Invest NI

CAFRE

QUB

NI Polymers Association