

Referat fra møde i Udvalg for Medicinsk Udstyr Torsdag den 27. februar 2014 kl. 10-12

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1. Velkomst

Vagn Nielsen bød velkommen.

2. Godkendelse af referat fra forrige møde

Referatet blev godkendt uden kommentarer.

3. Sundhedsstyrelsens erfaring med rekommandationslister for lægemidler

Oplæg ved Enhedschef Søren Brostrøm (Sundhedsstyrelsens Enhed for Sygehus og Beredskab).

Søren Brostrøm fortalte kort om Institut for Rationel Farmakoterapi (IRF) og præsenterede rekommandationslisterne på hjemmesiden www.irf.dk.

Rekommandationslisterne udarbejdes for udvalgte områder, først og fremmest til almen praksis, men finder også anvendelse i sygehusvæsenet og i samarbejde mellem primær- og sekundærsektoren. Søren Brostrøm fortalte om formålet, udvælgelseskriterier og hvad der danner basis for anbefalingerne. Dette kan man læse mere om på IRFs hjemmeside.

Der tages ikke hensyn til prisforhold og tilskud i de nationale rekommandationslister. Dette gøres i de regionale basislister, som udarbejdes af de regionale lægemiddelråd, se www.basislisten.dk

Udvalget spurgte til samarbejde med medicin håndbogen og lægehåndbogen. Sundhedsstyrelsen forklarede, at Promedicin.dk linker til produkter fra IRF og Sundhedsstyrelsen, herunder 'Nyt Om Bivirkninger'. Lægehåndbogen har endnu ikke forespurgt et samarbejde. Udvalget diskuterede udarbejdelsen og anvendelsen af de nationale rekommandationslister. Der var enighed om, at åbenhed og transparens er vigtigt i forhold til metoden og vurderingen af lægemidlerne – og at der er et behov for at have lignende oversigter for medicinsk udstyr. Udvalget foreslog at teste det på et område, for eksempel tandimplantater.

Sundhedsstyrelsen vil se på mulighederne for en rekommandationsliste for medicinsk udstyr på udvalgte områder, udvalget var interesseret i at bistå i dette arbejde.

4. Regionernes udbudsproces

Oplæg ved Johanne Boelskov (Region Hovedstadens, Indkøbsafdeling). Præsentationen er sendt ud til Udvalgets medlemmer i forbindelse med referatet.

Udvalget fandt oplæget meget interessant og diskuterede blandt andet patientinddragelse i regionens brugergrupper og standardisering af operationer. Johanne Boelskov fortalte, at minimumskrav i udbuddet ofte afhænger af de standarder og retningslinjer, som findes på det givne område - og de efterspurgte større inddragelse af input fra sundhedssektoren i udarbejdelsen af standarder.

Kristine Rasmussen fortalte, at udvalget vil gå videre med emnet omkring udbudsproces, da Peter Skjøt fra Region Hovedstadens enhed for kvalitet og patientsikkerhed kommer til næste møde og fortæller om de udfordringer der kan være, når et udbud er afsluttet.

5. Status på DaVinci operationsrobot

Punktet blev flyttet til næste møde, da undersøgelsen endnu ikke er afsluttet.

6. Høring af SCENIHR udtalelse om ” the safety of the use of bisphenol A in medical devices”

Ifølge SCENIHR er de væsentligste kilder til Bisphenol A fra medicinsk udstyr dental materiale og udstyr af plast som eksempelvis katetre og hæmodialyse udstyr. Ifølge SCENIHR vurderes bisphenol A i dental materiale ikke at udgøre en risiko. For udstyr af plast er der en bekymring, især omkring længerevarende brug til børn, herunder neonatale. Risikoen skal dog opvejes mod behandlingsmulighederne i denne patientgruppe. Kristine Rasmussen opfordrede til at sende høringssvar til SCENIHR.

7. Forslag af emner til kommende møder

- Det danske sprogkrav
- Opsamling på arbejdet i udvalget, herunder hvad vi fremadrettet skal beskæftige os med
- Oplæg ved Dansk Standard

8. Datoer for kommende møder

Mandag den 2. juni 2014 kl. 10 – 12

9. Evt.

Kristine Rasmussen vil udsende en påmindelse til de udvalgsmedlemmer, som mangler at indsende en habilitetserklæring.

Kristine Rasmussen fortalte, at projektet for lægers tilknytning til Medicoindustrien er udskudt til den 1. oktober 2014.



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Scientific Committee on Emerging and Newly Identified Health Risks

SCENIHR

Preliminary Opinion on

The safety of the use of bisphenol A in medical devices

SCENIHR adopted this opinion by written procedure on 27 of January 2014

1 About the Scientific Committees

2 Three independent non-food Scientific Committees provide the Commission with the
3 scientific advice it needs when preparing policy and proposals relating to consumer
4 safety, public health and the environment. The Committees also draw the Commission's
5 attention to the new or emerging problems which may pose an actual or potential threat.

6 They are: the Scientific Committee on Consumer Safety (SCCS), the Scientific Committee
7 on Health and Environmental Risks (SCHER) and the Scientific Committee on Emerging
8 and Newly Identified Health Risks (SCENIHR).

9 In addition, the Commission relies upon the work of the European Food Safety Authority
10 (EFSA), the European Medicines Agency (EMA), the European Centre for Disease
11 prevention and Control (ECDC) and the European Chemicals Agency (ECHA).

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13 This Committee deals with questions related to emerging or newly identified health and
14 environmental risks and to broad, complex or multidisciplinary issues requiring a
15 comprehensive assessment of risks to consumer safety or public health and related
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17 areas of activity include potential risks associated with interaction of risk factors, synergic
18 effects, cumulative effects, antimicrobial resistance, new technologies such as
19 nanotechnologies, medical devices including those incorporating substances of animal
20 and/or human origin, tissue engineering, blood products, fertility reduction, cancer of
21 endocrine organs, physical hazards such as noise and electromagnetic fields (from mobile
22 phones, transmitters and electronically controlled home environments), and
23 methodologies for assessing new risks. It may also be invited to address risks related to
24 public health determinants and non-transmissible diseases.

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37 © European Commission 2013

38 ISSN 1831-4783

ISBN 978-92-79-30133-9

39 Doi: 10.2772/75546

ND-AS-13-003-EN-N

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44 European Commission. The opinions are published by the European Commission in their
45 original language only.

46 http://ec.europa.eu/health/scientific_committees/policy/index_en.htm

1 **ACKNOWLEDGMENTS**

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4 opinion. The members of the working group are:

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36 All Declarations of working group members and supporting experts are available at the
37 following webpage:

38 http://ec.europa.eu/health/scientific_committees/emerging/members_wg/index_en.htm

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1 ABSTRACT

2 Currently many scientific discussions are ongoing on the possible adverse effects of
3 Bisphenol A (BPA). The BPA exposure of the population is mainly via food as a result of
4 the use of BPA in food packaging. The vast majority of the population (91–99%) has
5 detectable levels of BPA-conjugates in their urine. Medical devices are a specific product
6 category in which BPA may also be present. Examples include implants, catheters, and
7 most dental devices. BPA is a key building block of polycarbonate plastic and a precursor
8 for the manufacturing of monomers of epoxy resins. Polycarbonate is used in a wide
9 variety of products including medical devices for its balance of toughness, dimensional
10 stability, optical clarity, high heat resistance and electrical resistance. In addition to
11 polycarbonate medical devices, various dental materials are fabricated from monomers
12 such as bisphenol A glycidyl methacrylate (Bis-GMA) and bisphenol A dimethacrylate
13 (Bis-DMA), derived from BPA. This Opinion describes the risk assessment of exposure to
14 BPA via medical devices, for which the exposure routes are not limited to oral
15 applications.

16

17 In the existing evaluations for the oral route of exposure to BPA a No Observed Adverse
18 Effect Level (NOAEL) of 5 mg/kg body weight/day (b.w./day) in rats was established,
19 from which a Tolerable Daily Intake (TDI) of 50 µg/kg b.w./day was derived by using
20 default inter- and intra-species uncertainty factors in the risk assessment. More recently,
21 based on a different approach, EFSA has established a temporary TDI of 5 µg/kg
22 b.w./day. The main focus of these evaluations was on the oral route of exposure as this
23 is the main exposure route for the general population. However, there are still
24 unresolved issues in the risk assessment of BPA after oral uptake. In addition, especially
25 for medical devices manufactured from polycarbonate plastics, other exposure routes
26 such as subcutaneous and intravenous (e.g. during haemodialysis) are important.

27

28 After oral exposure BPA is readily absorbed from the gastro-intestinal (GI) tract and due
29 to the first pass effect in the liver is rapidly conjugated to BPA-glucuronide and to a
30 lesser extent to BPA-sulphate. BPA has a low systemic bioavailability (around 1%) and
31 BPA and its conjugates are eliminated in humans in a half life time of a few hours. At
32 variance for all the parenteral routes of exposure (including intravenous, intraperitoneal,
33 or subcutaneous), that may be relevant for medical devices, the chemical can be
34 considered 100% systemically bioavailable. However, BPA will also be conjugated in the
35 liver and the clearance of free BPA from the circulation appears to be relatively fast.

36

37 There are several indications that BPA might have biological effects below the current
38 NOAEL of 5 mg/kg b.w./day and the recently determined bench mark dose low₁₀
39 (BMDL₁₀) of 3.76 mg/kg b.w./day. However, the evidence has been mainly obtained in
40 dedicated studies focussing on specific outcome parameters like adiposity and hormone
41 levels, and not in general toxicity studies. Some of those parameters resulted in
42 contradicting results in various studies like a decrease, no increase or increase in weight.
43 Furthermore, dose-response relationships could not be established. Regarding possible
44 low dose effects the studies raise some concern for prenatal BPA exposure and an effect
45 on mammary gland development and on behaviour/anxiety, the relevance of which for
46 human health is not clear. In addition, the possible effects on metabolism and adiposity
47 also need further investigations in large scale studies with a wide dose range of BPA. So
48 far, the epidemiological studies performed do not provide consistent outcomes to
49 conclude on possible human health effects. Further extensive dose-response and/or
50 epidemiological studies are needed to confirm or negate these observations and their
51 relevance for human health effects, Therefore, SCENIHR considered that the recently
52 derived temporary oral TDI (t-TDI) based on general toxicity studies still represents a
53 solid base for carrying out a BPA risk assessment for the use of BPA in medical devices.

1 For medical devices, several exposure scenarios were evaluated such as external short-
2 term contact with a medical device, short and long-term contact with dental materials,
3 medium and long-term contact with an implanted medical device, long-term contact via
4 hemodialyzers and medium-term contact in intensive care units with various medical
5 devices. The highest estimated BPA exposures occurred during prolonged medical
6 procedures in infants (685 ng/kg b.w./day), and for prematurely born infants in neonatal
7 intensive care units (3000 ng/kg b.w./day, 3 µg/kg b.w./day). Contact with dental
8 materials gave an estimated short-term (<24 hours) exposure of 140 to 200 ng/kg
9 b.w./day for respectively children and adults, whereas long-term exposure ranges from 2
10 to 12 ng/kg b.w./day. Some of the estimated BPA exposures due to medical devices are
11 in the same range as exposure to BPA via the food (EFSA 2013). However, exposure due
12 to medical devices generally occurs for a limited period of time, resulting in a lower
13 overall exposure.

14 In general, it can be concluded that the long-term oral exposure via dental material is far
15 below the recently derived temporary oral external TDI of 5 µg/kg b.w./day derived from
16 animal studies and poses no risk for human health. In addition, short-term (relatively
17 high) exposures to dental materials are below this recently established temporary TDI (t-
18 TDI).

19 The parenteral exposure via medical devices, taking treatment of neonates in intensive
20 care units as the worst case scenario, is before adjustment for route specific systemic
21 availability, below the oral t-TDI of 5 µg/kg b.w./day derived from the BMDL₁₀ of 3.76
22 mg/kg b.w./day in animal studies. However, the kinetic differences between routes of
23 exposure indicate that the bioavailability after oral route of exposure is significantly lower
24 when compared to the parenteral one. Based on the analysis of oral versus intravenous
25 toxicokinetic data, the oral systemic bioavailability of unconjugated BPA is 2.8%, 0.2%,
26 0.9% and less than 1% in rats, mice, monkeys, and dogs, respectively. The systemic
27 availability of unconjugated BPA in humans has not been evaluated experimentally,
28 however, modelled data as well as controlled biomonitoring studies indicated that
29 internal exposure in humans to unconjugated BPA is very low (1-10%). Therefore, the
30 SCENIHR considered it appropriate to make the comparison using the internal dose
31 rather than the external one. Considering the internal BPA exposure for the worst case
32 scenario (the estimated exposure in neonatal intensive care units of 3 µg/kg b.w./day),
33 and using a 100% bioavailability of BPA for the exposure via medical devices, the internal
34 exposure is higher than the internal exposure based on the t-TDI (being 0.05 µg/kg
35 b.w./day as 1% bioavailability – taken as worst case – of 5 µg/kg b.w./day). However,
36 when comparing this systemic exposure due to medical devices (3 µg/kg b.w./day)
37 against the internal exposure of a dose at the BMDL₁₀ in rats of 3.76 mg/kg b.w./day
38 (37.6 µg/kg b.w./day), the highest internal exposure of BPA via medical devices is about
39 12-fold lower than the internal dose of the BMDL₁₀ observed in rats. The factor of 12 is
40 lower than the usual safety factor of 100 for assessing a margin of safety (MOS) when
41 extrapolating low to no risk exposure doses for humans based on results obtained in
42 animal studies. For prolonged medical procedures in infants with an estimated exposure
43 of 685 ng/kg b.w./day, the margin of safety is 55, while for the other long and short-
44 term exposure scenarios estimated for medical devices, the MOS is well above 100.

45 Based on these data. it is concluded that there may exist some risk for adverse effects of
46 BPA, when the BPA is directly available for systemic exposure after non-oral exposure
47 routes especially when neonates in intensive care units are concerned. However, better
48 data on exposure would be beneficial for the refinement of this risk assessment. In
49 addition, the controversial issues regarding possible effects at low dose and their
50 relevance for human health, especially after prenatal and/or perinatal exposure, do raise
51 some concern for exposure to BPA via medical devices especially in prematurely born
52 infants. Further research under well controlled exposure conditions is warranted to
53 confirm or negate these possible low dose effects in animal models and their relevance
54 for human health. The currently performed studies by the FDA's National Center for

1 Toxicological Research in the USA, with animals under a strict exposure regimen, may
2 clarify some of these controversial issues.

3 It should be realised that the benefit of medical devices has also to be considered: the
4 survival of these premature infants often depends on the availability of the same medical
5 devices which result in a relatively high BPA exposure due to treatment. The possibility to
6 replace BPA in these products should be considered against their efficiency in the
7 treatment, as well as the toxicological profile of the alternative materials.

8

9 Keywords:

10 Opinion to be cited as:

11 SCENIHR (Scientific Committee on Emerging and Newly Identified Health Risks), **Safety**
12 **of the use of bisphenol A in medical devices**, Date of adoption

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1 EXECUTIVE SUMMARY

2 Background

3 Currently, many scientific discussions are ongoing on possible adverse effects of BPA.
4 The BPA exposure of the population is mainly via food as a result of the use of BPA in
5 food packaging. Medical devices are a specific product category in which BPA may also be
6 present. Examples include implants, catheters, and most dental devices. Some BPA-
7 containing medical devices may have direct and/or indirect contact with patients (e.g.
8 hemodialyzer apparatus, filters, bypasses, tubing, pumps, instruments, surgical
9 equipment, blood pathway circuits and respiratory tubing circuits). This Opinion describes
10 the risk assessment of exposure to BPA via medical devices, for which the exposure
11 routes are not limited to oral applications.

12 What is BPA?

13 Bisphenol A [Bis(4-hydroxyphenyl)propane], BPA is a high-production volume industrial
14 chemical. BPA is a key building block of polycarbonate (PC) plastic and a precursor for
15 the manufacturing of monomers of epoxy resins. Polycarbonate is used in a wide variety
16 of products including medical devices for its balance of toughness, dimensional stability
17 optical clarity, high heat resistance and electrical resistance. In addition to polycarbonate
18 medical devices, various dental materials are fabricated from monomers such as
19 bisphenol A glycidyl methacrylate (Bis-GMA) and bisphenol A dimethacrylate (Bis-DMA),
20 derived from BPA. BPA-resins are also used in inks and adhesives. In addition to BPA
21 itself, polymers produced using BPA like polysulfone (PSU) used in medical devices are
22 considered because they can release BPA. For example, the BPA derived polysulfone is
23 used as membrane in hemolysis dialyzers.

24 Previous risk assessments

25 In the existing evaluations, the following conclusions have been drawn for the oral route
26 of exposure to BPA:

- 27 • No Observed Adverse Effect Level (NOAEL) of 5 mg/kg b.w./day in rats
- 28 • Tolerable Daily Intake (TDI) of 50 µg/kg body weight
- 29 • developmental toxic effects only observed at doses with severe maternal toxicity
30 in rats and mice
- 31 • an overall NOAEL for reproductive toxicity of 50 mg/kg b.w./day in rats and mice
- 32 • in terms of toxicokinetics, there is a difference between rats and humans (the
33 latter presenting a shorter half-life) as well as between the oral and the parenteral
34 route of exposure.
- 35 • due to the first pass effect, after oral uptake, the systemic exposure to free BPA is
36 a small fraction of the external dose in all species.
- 37 • there are still unresolved issues in the risk assessment of BPA after oral uptake.
38

39 More recently, EFSA established a temporary (t)-TDI of 5 µg/kg b.w./day for oral
40 exposure to BPA based on kidney alterations as the critical effect (EFSA 2014).

41 The main focus of these evaluations was on the oral route of exposure. Especially for
42 medical devices manufactured from polycarbonate plastics, other exposure routes such
43 as subcutaneous and intravenous (e.g. during haemodialysis) are important.

44 General exposure

45 The human population is exposed to BPA mainly through the diet, while air, dust, and
46 water, including skin contact with thermal paper, are other possible sources of exposure.
47 Bisphenol A in food and beverages accounts for the majority of daily human exposure.
48 BPA exposure results from either the release of non-polymerized monomers or from the
49 slow decay of polymer bonds in polycarbonate leading to monomer release into foods and
50 liquids. A number of studies in various countries have indicated that the vast majority of
51 the population (91–99%) has detectable levels of BPA-conjugates in their urine. The
52 measured BPA levels reflect the recent exposure of the past several hours just before the

1 sample collection in view of the rapid conjugation and elimination half-time of BPA in
2 blood of a few hours. Free and conjugated BPA levels in blood are typically $\leq 1 \mu\text{g/L}$,
3 which is consistent with the known rapid plasma clearance of BPA and its metabolites and
4 kinetic studies conducted in humans.

5 Notably, regarding BPA determination, the analytical method used to detect both the
6 parent compound and its metabolites is crucial especially at the low levels expected in
7 biological samples. Therefore, the sampling and analytical methods used represent a
8 relevant source of differences among available studies. A potential artifact in BPA
9 measurements is the leakage of BPA from the labware used, which results in sample
10 contamination.

11 In urine, BPA is present mainly in its conjugated form. Urinary biomonitoring data
12 provide information on the internal dose, which is the result of total BPA exposure,
13 independently from the sources. Therefore, biomonitoring data in urine account not only
14 for dietary exposure, but also for non-food sources (e.g. medical devices, dust, thermal
15 and other kinds of papers). Since BPA urinary excretion is almost complete within 24
16 hours after exposure and due to the less invasive sampling, urine is the matrix of choice
17 for assessing daily exposure to BPA in humans. Urine BPA levels depend on frequency of
18 exposure (e.g. food intake, treatment with medical devices), time of sampling after
19 exposure, the last urination and urine production rate. Blood concentrations of total BPA
20 (free plus conjugates) determined at one time point are not representative of an average
21 exposure, because it is strongly dependent on the time of blood sampling with respect to
22 the exposure time.

23 On the basis of available biomonitoring and exposure data, it was recently concluded that
24 the exposure to BPA from non-food sources that by some authors was hypothesized as
25 potentially relevant sources, is generally lower than that from exposure from food by at
26 least one order of magnitude for most studied general population subgroups. Dietary
27 exposure was indeed estimated to contribute more than 90% to the overall BPA-
28 exposure for non-occupationally exposed individuals. However, few data are available for
29 patients treated with BPA-containing medical devices.

30 For risk assessment purposes, the bioavailability of free BPA is crucial as this is the active
31 compound. However, data on both free and conjugated BPA are required to assess the
32 exposure and fate of BPA.

33 **Exposure from medical devices**

34 Medical devices based on polycarbonate and polysulfone due to their chemistry can
35 contain BPA residues, whereas others like PVC based medical devices may or may not
36 contain BPA residues depending on their production method. In addition, some other
37 BPA-derivatives (such as epoxy resins) are used specifically in dental materials. The
38 major factor influencing the residual amount of BPA levels is the employment of incorrect
39 operating conditions during the processing step. Moreover, breakdown or hydrolysis of
40 the polycarbonate polymer after manufacturing can occur, thus giving rise to the free
41 monomer from the polymer available for exposure. In polycarbonate articles used for
42 food contact, the residual content is usually less than $10 \mu\text{g/g}$ of polycarbonate (ECB,
43 2003).

44 Exposure can be estimated by either measuring the BPA content of the medical devices
45 or by extraction assays for potential release. Extraction of BPA was much more
46 prominent in aqueous ethanol (17.2% v/v) and bovine serum (mimicking human serum)
47 than in water. For PC casings of hemodialyzers and hollow fibres used in hemodialyzers,
48 extracted amounts of BPA were reported up to 12.2 mg/kg material. Under simulated use
49 conditions, release in bovine serum was up to 2090 ng/dialyzer , and in aqueous ethanol
50 (17.2% v/v) up to 4300 ng/dialyzer . For dental materials, the leakage is limited to resins
51 composed of Bis-DMA (Bisphenol A dimethylacrylate) which has an ester linkage that can
52 be hydrolysed to BPA, whereas the ether linkage in Bis-GMA (Bisphenol A glycidyl
53 methacrylate) was found to be stable.

1 For BPA exposure resulting from the use of medical devices, little information is available.
2 For the placing of dental composite resin restorations, measurements have shown that
3 the release of BPA mainly occurs during the few hours directly after application while the
4 BPA level is back to pretreatment levels at 24 hours. Values measured were up to 30
5 µg/mL saliva, and 931 µg in total saliva volume produced in one hour. Calculations based
6 on the actual amount of material used in clinical practice and a median 4-year life-time of
7 a composite restoration, suggests a maximum exposure of 0.06 µg BPA/day from fissure
8 sealants, and a maximum exposure of 0.36 µg BPA/day from composite restorations.
9 Contact with dental materials gave an estimated short-term (<24 hours) exposure of 140
10 to 200 ng/kg body weight per day for children and adults, respectively, whereas long-
11 term exposure ranges from 2 to 12 ng/kg b.w./day. These BPA releases contribute to the
12 oral exposure to BPA.

13 Measurements in dialysis patients found total BPA values up to 6.6 ng/mL blood. In
14 prematurely born infants undergoing intensive therapeutic medical interventions, for BPA
15 a geometric mean urinary concentration of 30.3 µg/L (ng/mL) was observed with the
16 highest value measured 946 µg/L (ng/mL), which was about ten times higher than that
17 among children 6-11 years old. More than 90% of the BPA detected in the urine of the
18 prematurely born infants was in its conjugated (e.g. glucuronide, sulphate) form.

19 The highest exposures estimated occurred during i) prolonged medical procedures in
20 infants (685 ng/kg body weight per day), ii) the treatment of adults with medical devices
21 consisting of BPA containing PVC (1000 ng/kg b.w./day), iii) treatment of prematurely
22 born infants in neonatal intensive care units (NICU) (3000 ng/kg b.w./day), and iv)
23 treatment of prematurely born infants with medical devices consisting of BPA containing
24 PVC (7000 ng/kg body weight per day, 7 µg/kg body weight per day). Short-term
25 exposure via medical devices consisting of BPA containing PVC might even be higher
26 (adults up to 5000 ng/kg b.w./day, infants up to 12000 ng/kg b.w./day). However, it is
27 worth noting that exposure to BPA via BPA-containing PVC has been estimated based on
28 extrapolation from data on phthalate leakage from PVC and are, therefore, affected by a
29 high degree of uncertainties.

30 Contact with dental materials gave an estimated short-term (<24 hours) exposure of 140
31 to 200 ng/kg body weight per day for respectively an infant and an adult.

32 Taking into account the many possible sources of exposure of patients during hospital
33 care and the scarcity of information related to release of BPA from medical devices, six
34 critical exposure scenarios were evaluated to estimate potential exposure to BPA from
35 medical devices. Some of the estimated BPA exposures due to medical devices are in the
36 same range as exposure to BPA via food (high exposure for population older than 6
37 months 857 ng/kg b.w./day, high exposure for infant day 1-5 after birth 495 ng/kg
38 b.w./day) (EFSA 2013). However, exposure associated to medical devices use generally
39 occurs for a limited period of time with the exception of haemodialysis practices.

40 **BPA metabolism and toxicokinetics in humans**

41 The major BPA metabolite in humans is BPA-glucuronide, which is quantified in plasma
42 and rapidly excreted in the urine; BPA-sulphate has been also detected after oral
43 exposure as a minor metabolite. After oral exposure, there is a very high first pass effect
44 in the liver that results in very small amounts of unchanged parent BPA. In humans, a
45 polymorphism exists for the conjugation of BPA. However, the polymorphism was found
46 to result in a 4-5-fold variability of plasma BPA. Therefore, it can be considered that the
47 default value used in the risk assessment to account for kinetic interindividual variability
48 within the general population can cover the differences due to polymorphically expressed
49 enzyme activity involved in BPA metabolism.

50 Studies on toxicokinetics of BPA available to date have demonstrated a significantly lower
51 internal exposure to free BPA after oral intake as compared to parenteral exposure. This
52 is essentially due to the highly efficient pre-systemic conjugation to glucuronide and
53 sulphate, which occurs mainly in the liver and partially in the gut after oral administration

1 independently on the species. Thus, the internal exposure to free BPA after oral intake is
2 lower as compared to dermal or parenteral exposure, although for the latter routes of
3 exposure, the biotransformation (mainly in the liver) quickly diminishes free circulating
4 BPA.

5 After oral exposure, both low and high single oral doses of BPA are well absorbed
6 (>90%), but the systemic bioavailability of free BPA after oral exposure is reduced by the
7 first pass effect. Based on the analysis of oral versus intravenous toxicokinetic data
8 (Doerge et al., 2010a, 2010b; 2011; 2012), the oral systemic bioavailability of
9 unconjugated BPA is 2.8%, 0.2%, 0.9% and less than 1% in rats, mice, monkeys, and
10 dogs, respectively. The systemic availability of unconjugated BPA in humans has not
11 been evaluated experimentally, however, modelled data as well as controlled
12 biomonitoring studies indicated that internal exposure in humans to unconjugated BPA is
13 very low (1-10%) (Mielke and Gundert-Remy, 2012; ANSES, 2013). The conjugates are
14 readily excreted in the urine, as a consequence the half-life of BPA in humans is very
15 short, ranging from 1 to 3.5 hours. After dermal exposure, the absorption fraction can be
16 considered approximately 25-30% of the applied dose, which is directly systemically
17 bioavailable.

18 For all the parenteral routes of exposure (including intravenous, intraperitoneal,
19 transdermal or subcutaneous), the chemical is 100% systemically bioavailable: however,
20 the clearance of free BPA from the circulation appeared to be quite fast, as indicated by
21 controlled studies in non human primates and rats with >50% of circulating BPA already
22 conjugated 5 min after intravenous injection, and showing a half-life of 0.66 h in rats.

23 The available modeled data, obtained after oral exposure, indicate that newborns and
24 babies up to 6 months constitute a potentially susceptible subpopulation due to potential
25 immature BPA metabolism. However, the default uncertainty factor which is used to
26 account for the toxicokinetic variability in the general population seems to be large
27 enough to cover the variability in the newborn population exposed via the oral route.

28 **Pharmacokinetics in animals**

29 Rats show a prolonged clearance of BPA due to the existence of the so-called entero-
30 hepatic recirculation. After uptake from the GI-tract in rats there is a high degree of
31 conjugation of BPA in the liver. However, BPA is excreted from the liver via bile into the
32 GI-tract where it can be cleaved again resulting in free BPA that can be recirculated or
33 excreted via the faeces. Thus, there may be a higher exposure to free BPA especially in
34 neonatal animals after a specific oral dose when compared to humans. It may be
35 considered that neonatal effects studies in mice and rats may over-predict adverse
36 outcomes in humans.

37 **Toxicity of BPA**

38 Several toxicity studies have been performed in rodents and dogs. BPA was found to be
39 of low acute toxicity for all routes of exposure relevant to human health. The lowest
40 NOAEL after oral repeated exposure was indicated in the previous evaluations as
41 approximately 5 mg/kg b.w./day, based on effects on the liver as target organ, as
42 identified in several studies, including multigeneration reproductive toxicity studies. The
43 next lowest NOAEL for oral exposure was 50 mg/kg b.w./day, based on toxic effects on
44 the kidney and reproductive toxicity.

45 By applying the benchmark dose (BMD) approach, EFSA recently calculated a BMDL₁₀ of
46 3.76 mg/kg b.w./day using data from the same multigeneration reproductive toxicity
47 study in mice from which the NOAEL of 5 mg/kg b.w./day was previously derived (EFSA
48 2014). The BMDL₁₀ represents the lower level of the confidence interval of the effect
49 resulting in a 10% deviation from vehicle-treated control animals. The critical endpoint
50 (i.e. appearing at the lowest dose) for this BMDL₁₀ was the alteration in kidney weight.

51 BPA is not a mutagen in *in vitro* test systems, nor does it induce cell transformation. BPA
52 has been shown to affect chromosomal structure in dividing cells in *in vitro* studies, but
53 evidence for this effect in *in vivo* studies is inconsistent and inconclusive. In addition, BPA

1 was found to be genotoxic in *in vitro* micronucleus assays. These findings were not
2 confirmed by *in vivo* studies. Therefore, BPA is not likely to pose a genotoxic hazard to
3 humans.

4 In standard carcinogenic OECD testing protocols, BPA has no carcinogenic activity. In
5 addition, in multigeneration studies, no indication of increased cancerogenicity was
6 observed. Studies using subcutaneous administration of BPA indicated that BPA may
7 have the ability to increase the effects of well-known carcinogens even at very low BPA
8 levels. These studies had limitations which render them unsuitable to assess whether BPA
9 itself has a carcinogenic potential by prenatal or perinatal exposure.

10 Prenatal exposure to BPA by subcutaneous injection in pregnant rats induced mammary
11 gland alterations in the offspring including cell proliferation, some described as pre-
12 neoplastic and neoplastic lesions. Similar results were obtained in mouse studies and
13 results observed in rhesus monkeys also indicated alterations of glandular tissue in the
14 mammary gland after prenatal exposure. However, the variability in mammary gland
15 development in this species makes it difficult to draw clear conclusions for the risk
16 assessment. In contrast, similar alterations were not observed in the pups of mouse
17 multigeneration studies with continuous oral BPA exposure.

18 In summary, at present there are no indications for carcinogenic effects of BPA in OECD
19 guideline studies, but there are some effects observed in the mammary gland. The
20 observed effects on mammary gland development raise some concern and do need
21 further investigation, as the biological significance of such alterations is currently
22 unknown.

23 The interpretation on neurological effects of BPA is uncertain. Studies on anxiety (rodent
24 and non-human primate) have a behavioural endpoint which is highly dependent on
25 study design, testing apparatus, inclusion of only one sex, and age at examination. In
26 several studies, increased anxiety was observed. However, there is uncertainty with
27 regard to the interpretation of the data. Recent data indicate sex-dimorphic effects of
28 BPA on social behaviour. However, it is uncertain whether such an effect could be
29 considered adverse for humans. Additionally, gene expression in the brain was altered
30 after both prenatal BPA exposure and BPA exposure in adult mice. Other effects
31 described in the recent studies may indicate that the effects observed with BPA on
32 hypothalamic organization involves mechanisms different from its estrogenic action
33 because they are very different from those of oestradiol which was used as positive
34 control. The variety of read-out parameters and the effects observed warrant further
35 investigation of the possible neurological and behavioural effects of BPA, as well as their
36 relevance for humans, displaying a different pattern of brain development when
37 compared to rodents.

38 BPA is able to elicit skin sensitization in humans, probably because it is a weak sensitiser.
39 Studies on a possible relationship between prenatal and/or postnatal BPA exposure and
40 allergic responses are not consistent. Although effects on the immune system are
41 suggested, there is uncertainty on the immunotoxicity of BPA. In view of the suggested
42 effects of BPA on the immune system, further investigation to determine potential
43 immunotoxicity of BPA is warranted.

44 The toxicological data do not indicate a clear effect of BPA on cardiovascular function.

45 Several published studies have directly addressed the issue of whether developmental
46 exposure to BPA can affect adiposity, glucose or insulin regulation, lipid profiles or other
47 endpoints related to diabetes or metabolic syndrome. Animal studies, however, have
48 shown an increase, a decrease and no effect on body weight. The discrepancy among the
49 various animal studies may arise from variation in experimental conditions, such as the
50 dosing regimen, animal species and strains, and the timing of evaluation of effects. A
51 number of studies in prenatally- and postnatally- exposed rats and mice suggest that
52 BPA exposure has an effect on metabolic function. In some of the studies the findings
53 have been claimed as evidence of a non-monotonic dose-response, as effects seen at a
54 lower dose were not observed at higher doses. However, these effects were only seen at

1 one dose level. There are no studies which demonstrate effects of different effect size at
2 two dose levels and no or a reduced effect at a higher dose, thus corroborating the
3 existence of non-monotonicity. There is, however, no convincing evidence that BPA is
4 obesogenic later in life after intrauterine exposure or in longer-term studies. Thus,
5 regarding a metabolic effect of BPA, no clear conclusions can be drawn at present due to
6 a lack of consistent evidence. Additionally, in epidemiological studies, inconsistent results
7 were obtained. Therefore, this issue still warrants further investigation.

8 A large number of studies is available on the effects of BPA on reproduction and prenatal
9 development, some of which performed according to internationally agreed guidelines
10 and compliant to GLP principles. A wealth of *in vitro* results and studies on non-intact
11 animals (such as ovariectomised rodents) is available, but their value for risk assessment
12 is questionable. There are also uncertainties as to reproducibility of several individual
13 studies. These studies were conducted in rats and mice. Female reproductive toxicity
14 after oral exposure occurred with an overall NOAEL of 50 mg/kg b.w./day and a LOAEL of
15 500 mg/kg b.w./day. However, at the LOAEL for female reproductive effects, significant
16 body (or organ) weight reduction and hepatic toxicity occurred (i.e. the effects used as
17 Point of Departure for the TDI derivation). As to developmental toxicity, BPA does not
18 cause malformations or birth defects in rats or mice at levels up to the highest doses
19 evaluated: 640 mg/kg/day (rats) and 1250 mg/kg/day (mice). Therefore, it can be
20 concluded that BPA is essentially not a specific reproductive or developmental toxicant.
21 General toxicity effects such as body and organ weights, liver histopathology and
22 nephropathy often occur simultaneously with reproductive or developmental effects,
23 which are only observed at high dosages.

24 In conclusion, there are several indications that BPA does have biological effects below
25 the current NOAEL of 5 mg/kg b.w./day (oral exposure) and the recently calculated
26 BMDL₁₀ of 3.76 mg/kg b.w./day (oral exposure). However, the evidence has not been
27 obtained in general toxicity studies, but mainly in dedicated studies focussing on specific
28 outcome parameters like adiposity and hormone levels. The effect on some of those
29 parameters resulted in contrasting results in various studies (e.g. decrease, no effect or
30 increase in body weight). In addition, dose-response relationships could not be
31 established.

32 Regarding possible low dose effects, the studies raise some concern for prenatal BPA
33 exposure. In addition, the possible effects on metabolism and adiposity need further
34 investigation in large scale studies with a wide dose range of BPA.

35 **Epidemiological studies**

36 There are a limited but increasing number of epidemiological studies that investigated an
37 association between BPA exposure and health outcomes. Studies have also been
38 performed to determine potential altered behavior after dental BPA exposure.
39 Epidemiological studies regarding effects of BPA on metabolic disorders and/or obesity
40 show inconsistent results. Most of them use cross-sectional designs which are not
41 suitable for establishing a cause-effect relationship, especially for outcomes that have
42 long latency periods (e.g. cardiovascular disease, diabetes). Many of these cross-
43 sectional analyses have several important weaknesses that limit their interpretation and
44 relevance. For instance, a major limitation is the use of a single spot urine sample that
45 reflects recent BPA exposure only (past several hours) and may not adequately measure
46 BPA exposure during the relevant etiological window for health outcomes like
47 cardiovascular disease and diabetes, which might be years or decades earlier.

48 For further clarification and interpretation of the relationship between BPA exposure and
49 adverse health effects, additional studies are needed. These should include prospective
50 studies with serial exposures to BPA assessed during etiologically relevant windows,
51 years before development of disease, and thus prolonged follow up periods. Specific
52 recommendations for use of existing data include the development of conversion models
53 for the different media used for measurement of persistent chemicals, and inter-
54 laboratory comparisons and calibrations. Recommendations for further data collection on

1 BPA include: i) better evaluation of exposure, especially in children; ii) repeated
2 measurements over time; iii) validation and harmonization of questionnaires; and iv)
3 adequate detection methods.

4 **Conclusions on health effects**

5 Regarding potential health effects of BPA exposure and the level of exposure, several
6 controversial issues remain, as there are indications, although not fully convincing, that
7 BPA has biological effects below the NOAEL of 5 mg/kg b.w./day (oral repeated
8 exposure) and the recently calculated BMDL₁₀ of 3.76 mg/kg b.w./day (oral repeated
9 exposure). Regarding possible low dose effects, the studies raise some concern for
10 prenatal BPA exposure and an effect on mammary gland development and altered
11 behaviour/anxiety, although the results are not sufficiently robust to be used in risk
12 assessment. In addition, the possible effects on metabolism and adiposity need further
13 investigation in large scale studies with a wide dose range of BPA. Also effects of BPA on
14 behaviour/anxiety need further investigations. To date, available epidemiological studies
15 performed do not provide consistent outcomes to conclude on possible human health
16 effects. The currently performed study by the FDA's National Center for Toxicological
17 Research (NCTR) in the USA with animals under a strict exposure regimen as well as the
18 studies to be conducted on these animals by various research groups may clarify some of
19 these controversial issues.

20 **Alternatives for BPA**

21 Several alternatives for BPA exist and are increasingly used, notably Bisphenol S and
22 Bisphenol F and some halogenated bisphenol A derivatives (e.g. tetrachlorobisphenol A
23 and tetrabromobisphenol A). For some of the alternatives, similar effects as for BPA were
24 reported regarding endocrine activity in *in vitro* assays, although with reduced
25 activity/potency when compared to BPA. The general toxicological profile of alternatives
26 is much less known.

27 **Recommendations for research**

28 The risk of BPA exposure from medical devices is associated with the release of BPA from
29 these devices, although the actual level of exposure is poorly characterised and deserves
30 further investigation. For sterilization of medical devices, it is known that steam
31 sterilization may result in release of BPA from PC medical devices. Whether ethylene
32 oxide (EtO) sterilization induces release of BPA from PC or PSU medical devices is yet
33 unknown. Therefore, research into the use and consequences of EtO sterilization with
34 regard to BPA release is also recommended.

35 At present, there are no indications for carcinogenic effects of BPA in OECD guideline
36 studies. However, some studies investigating possible low dose effects raise some
37 concern for prenatal BPA exposure and an effect on mammary gland development. The
38 observed effects on mammary gland development need further investigation because the
39 biological significance of these alterations is currently unknown.

40 Although effects on the immune system are suggested, the data are insufficient to draw
41 final conclusions on immunotoxicity of BPA. In view of these suggested effects of BPA on
42 the immune system, further investigation of potential immunotoxicity of BPA is
43 warranted.

44 There is no convincing evidence that BPA affects metabolism and adiposity, or is
45 obesogenic later in life after intrauterine exposure or in longer-term studies. Thus,
46 regarding a metabolic effect of BPA, no clear conclusions can be drawn at present due to
47 a lack of consistent evidence. Additionally, epidemiological study results were
48 inconsistent. Therefore, the effects of BPA on metabolism warrants further investigation.

49 The currently performed study by the FDA's National Center for Toxicological Research
50 (NCTR) in the USA with animals under a strict exposure regimen and the studies to be
51 conducted on these animals by various research groups may clarify some of these
52 controversial issues and give indications for specific research priorities.

1 Human studies should include prospective epidemiological studies with serial exposures
2 to BPA assessed during etiologically relevant windows, years before development of
3 disease, and prolonged follow up periods. Specific recommendations for use of existing
4 data include the development of conversion models for the different media used for
5 measurement of persistent chemicals, inter-laboratory comparisons and calibrations.
6 Recommendations for further data collection on BPA include: i) better evaluation of
7 exposure, especially in children; ii) repeated measurements over time; iii) validation and
8 harmonization of questionnaires; and iv) adequate methods of detection.

9 **Conclusions on medical devices**

10 For medical devices, several exposure scenarios were evaluated such as external short-
11 term contact with a medical device, short and long-term contact with dental materials,
12 medium and long-term contact with an implanted medical device, long-term contact via
13 hemodialyzers and medium-term contact in intensive care units with various medical
14 devices. Exposure due to medical devices generally occurs for a limited period of time,
15 with the exception of haemodialysis patients. Indeed, for implanted medical devices, the
16 release of BPA is higher after the implantation and rapidly decreases with time to zero
17 levels (kinetic being determined by the BPA initial content). BPA may be 100%
18 systemically bioavailable following a parenteral exposure route (depending on the type of
19 medical device); however, the bioavailability of free BPA after oral exposure is much
20 lower (1-10% of the ingested dose).

21 The highest exposures estimated occurred during prolonged medical procedures in
22 infants (685 ng/kg body weight per day) and prolonged exposure in the neonatal
23 intensive care unit (NICU) for treatment of prematurely born infants (3000 ng/kg body
24 weight per day). The latter exposure is about 6-fold the dietary exposure of infants at
25 days 1-5 after birth (high exposure for infants day 1-5 after birth 495 ng/kg b.w./day).

26 Contact with dental materials gave an estimated short-term (<24 hours) oral exposure of
27 140 to 200 ng/kg body weight per day for children and adults, respectively, whereas long
28 -term exposure ranges from 2 to 12 ng/kg b.w./day. Some of the estimated BPA
29 exposures due to medical devices are in the same range as exposure to BPA via food
30 (EFSA 2013).

31 It can be concluded that the oral long-term exposure via dental material is far below the
32 recently determined temporary oral TDI of 5 µg/kg b.w./day derived from animal studies
33 (EFSA 2014) and pose no risk for human health. The same applies to short-term
34 (relatively high) exposure to BPA released from dental materials that is still below the
35 recently established t-TDI, also considering that the peak of release is limited to few
36 hours after application.

37 For the risk assessment, the exposure data of prematurely born infants in a NICU are
38 used (3000 ng/kg b.w./day) as the worst case. The scenario for exposure to BPA via use
39 of medical devices consisting of BPA containing PVC would result in a potential estimated
40 higher exposure (up to 7000 ng/kg b.w./day) for these prematurely born infants.
41 However, it is worth noting that in the absence of data, exposure to BPA via BPA-
42 containing PVC has been estimated based on extrapolation from data on phthalate
43 leakage from PVC and are, therefore, affected by a high degree of uncertainty. In
44 addition, European PVC manufacturers do not use BPA in their PVC production. Hence, it
45 is unlikely that such a high BPA exposure will be reached due to the use of medical
46 devices consisting of BPA containing PVC.

47 Considering possible internal exposures and bioavailability of free BPA for the worst case
48 scenario as estimated exposure via medical devices (3 µg/kg b.w./day with 100%
49 systemic bioavailability), the systemic exposure is about 60-fold higher when compared
50 to the internal exposure to free BPA using the oral t-TDI (being 0.05 µg/kg b.w./day
51 based on a t-TDI of 5 µg/kg b.w./day with 1% systemic bioavailability).

1 When this worst case scenario estimated systemic exposure due to medical devices is
2 compared against the oral BMDL₁₀ in rats of 3.76 mg/kg b.w./day, the internal exposure
3 via medical devices (3 µg/kg b.w./day) is about 12-fold lower than the internal exposure
4 of the oral BMDL₁₀ observed in rats (37.6 µg/kg b.w./day). The factor of 12 is lower than
5 the usual safety factor of 100 for assessing a margin of safety (MOS) when extrapolating
6 low to no risk exposure doses for humans from results obtained in animal studies. For
7 prolonged medical procedures in infants with an estimated exposure of 685 ng/kg
8 b.w./day, the margin of safety is 55, while for the other exposure scenarios estimated,
9 the MOS is well above 100.

10 Based on these data, it is concluded that there may exist some risk for adverse effects of
11 BPA when the BPA is directly available for systemic exposure after non-oral exposure
12 routes especially in neonates. However, better data on exposure would be beneficial for
13 the refinement of this risk assessment. In addition, the controversial issues regarding
14 possible low dose effects and their relevance for human health, especially after prenatal
15 and/or perinatal exposure do raise some concern for exposure to BPA via medical
16 devices, especially in prematurely born infants. Further research under well controlled
17 exposure conditions is warranted to confirm or negate these possible low dose effects in
18 animal models and their relevance for human health.

19 It should be realised that the benefit of medical devices should also be considered: the
20 survival specifically of these prematurely born infants often depends on the availability of
21 the same medical devices which result in a relatively high BPA exposure due to
22 treatment. The possibility to replace BPA in these products should be considered against
23 their efficiency in the treatment, as well as the toxicological profile of alternatives.

1. BACKGROUND

Bisphenol A (BPA) is an intermediate that is mainly used in combination with other chemicals to manufacture plastics and resins. For example, BPA is used in polycarbonate, a high performance transparent, rigid plastic used to make food containers, such as returnable beverage bottles, tableware (plates and mugs) and storage containers. Residues of BPA are also present in epoxy resins used to make protective coatings and linings for food and beverage cans and vats. BPA can migrate in small amounts into food and beverages stored in materials containing the substance.

BPA is a weak oestrogen, as demonstrated by *in vitro* studies. Many *in vivo* studies have been performed to examine its potential effects on reproduction and development. The safety of BPA in food contact materials has been evaluated by the US Food and Drug Administration¹ and by the European Food Safety Authority². Although these evaluations did not identify outright reasons for concern, a number of uncertainties in the current scientific knowledge concerning the safe use of BPA remain. Considering these remaining uncertainties, especially with regard to the potential adverse health effects of BPA exposure to infants through polycarbonate baby bottles, the European Commission decided on the basis of the precautionary principle that all baby bottles on the EU market containing BPA should be replaced by the middle of 2011.

Recently, safety concerns have been expressed for vulnerable groups such as infants, pregnant and breast-feeding women exposed to BPA through other products. Medical devices are a particular product category in which BPA is often found. Examples include implants, catheters, and most dental devices. Some BPA-containing medical devices may have direct and/or indirect contact with the patients (e.g. autotransfusion apparatus, filters, bypasses, tubing, pumps, instruments, surgical equipment, blood pathway circuits and respiratory tubing circuits). These products are used on all types of patients e.g. adults, children etc.

Due to the common use of polycarbonate plastic and epoxy resins in such a wide range of products, low level human exposure to BPA occurs, but the health significance of the exposure levels has been controversial.

According to Council Directive 93/42/EEC, medical devices may only be placed on the market if they meet the essential requirements laid down in its Annex I. The devices must be designed and manufactured in such a way that, when used under the conditions and for the purposes intended, they will not compromise the clinical condition or the safety of patients, or the safety and health of users or, where applicable, other persons, provided that any risks which may be associated with their use constitute acceptable risks when weighed against the benefits to the patient and are compatible with a high level of protection of health and safety.

38

2. TERMS OF REFERENCE

In the light of the above considerations, on the basis of the available scientific evidence and taking into account the previous safety evaluations of BPA, the Scientific Committee on Emerging and Newly Identified Health Risks is requested to provide a scientific opinion on 'The safety of the use of bisphenol A in medical devices'.

In particular, the SCENIHR is asked:

1. To determine whether levels of exposure to BPA from the use of the various medical devices containing BPA could give reasons for concern from the health point of view and, if possible, to provide indications on limit values for BPA release from medical devices.

¹ <http://www.fda.gov/newsevents/publichealthfocus/ucm064437.htm>

² <http://www.efsa.europa.eu/en/topics/topic/bisphenol.htm>

- 1 2. To identify whether any particular medical devices containing BPA could result in
2 human exposures which will give reasons for concern under their normal use patterns or
3 other foreseeable circumstances (e.g. high release of BPA due to the nature of the
4 material of the medical device or to particular contact conditions).
- 5 3. To identify, any patient group e.g. infants, pregnant and breastfeeding women who
6 would be particularly at risk in light of the answer to the above questions.
- 7 4. In case reasons for concern related to BPA are identified, to propose possible
8 alternative approaches that could reduce potential risks either by identifying alternative
9 practices or by identifying alternatives to the use of BPA in medical devices. If no clear
10 answer can be provided on this point, the SCENIHR is asked to formulate
11 recommendations for research that could help provide scientific evidence to that end.
12

1 **3.SCIENTIFIC RATIONALE**

3 **3.1. Introduction**

4 Bisphenol A [Bis(4-hydroxyphenyl)propane], BPA is a high-production volume industrial
5 chemical. According to industry, about 3.8 million tons BPA were produced worldwide in
6 2006 (Plastic Europe 2007, WHO/FAO 2010). More than 95% of the BPA produced is
7 used to manufacture polycarbonate plastic and as a precursor of the manufacturing of
8 monomers of epoxy resins (Plastic Europe 2007, WHO/FAO 2010, Beronius and Hanberg
9 2011, Genuis *et al.*, 2011). Other uses of BPA include production of the flame retardant
10 tetrabromobisphenol A, production of thermal paper, and as an antioxidant in plasticizers
11 and for inhibiting the polymerization in polyvinyl chloride (PVC). The European Council of
12 Vinyl Manufacturers informed that the use of BPA for polymerisation and stabilisator for
13 storage of vinyl chloride in Europe was discontinued from December 2001 (KEMI 2011).
14 However, PVC as a source of BPA exposure cannot be completely excluded because BPA-
15 containing PVC may still be used in the EU due to the global market for medical devices.

16 BPA is a key building block of polycarbonate plastic. Polycarbonate plastic is a
17 lightweight, high-performance plastic that possesses a balance of toughness, dimensional
18 stability, optical clarity, high heat resistance and electrical resistance. Because of these
19 attributes, polycarbonate is used in a wide variety of common products such as food and
20 drink packaging materials, plastic water bottles and infant feeding bottles, digital media
21 (e.g. CDs, DVDs), electrical and electronic equipment, construction glazing, sports safety
22 equipment and medical devices. The durability, shatter-resistance and heat-resistance of
23 polycarbonate make it a good choice for tableware as well as reusable bottles and food
24 storage containers that can be conveniently used in the refrigerator and microwave. As
25 an alternative to polycarbonate (PC), polysulfone (PSU) is also used in some medical
26 devices. As polysulfones are polymers that can be obtained by a reaction between
27 Bisphenol A and bis(4-chlorophenylsulfone), producing an ether-oxide, leaching of BPA
28 from PSU is possible. BPA-resins (such as BADGE: Bisphenol A diglycidyl ether, Figure 1)
29 are used as lacquers to coat metal products such as food cans, bottle lids, coatings inside
30 drinking water and waste water tanks, large wine storage tanks and water supply pipes.

31 In addition to polycarbonate medical devices, some dental materials are fabricated from
32 monomers such as bisphenol A glycidyl methacrylate (Bis-GMA, Figure 1) and bisphenol
33 A dimethacrylate (Bis-DMA, Figure 1) derived from BPA (Fleisch *et al.*, 2010). BPA-resins
34 are also used in inks and adhesives. Polymers produced using BPA (e.g. polysulfone) are
35 used as membranes in hemolysis dialysers. A detailed description of use of BPA,
36 polycarbonate, and epoxy resins is listed elsewhere (Beronius and Hanberg, 2011). Trace
37 amounts of BPA are present, as residues of polymerisation process, in polycarbonate,
38 epoxy resins and dental sealants.

39 About 3% of total polycarbonate production is used for the manufacture of medical
40 devices (Beronius and Hanberg, 2011). Various medical devices produced with BPA
41 derived materials (polycarbonate, polysulfone and BPA-resins) are mentioned in Annex 1.

42 Several health risk assessments of BPA have been conducted by regulatory authorities as
43 well as expert groups based on oral exposure (ECB, 2003, EC 2010b; EFSA 2006 and
44 2010, NTP-CERHR 2008, Environment Canada/Health Canada 2008, WHO/FAO 2010; US-
45 FDA, 2013). ANSES (2011) provided a report on the hazard identification of BPA. The risk
46 assessment methodology used in this opinion includes the conclusions of the earlier risk
47 assessments updated with the recent relevant data on BPA.

48 Other bisphenols [for example Bisphenol B: Bis(4-hydroxyphenyl)butane, BPE: Bis(4-
49 hydroxyphenyl)ethane], Bisphenol F: Bis(4-hydroxyphenyl)methane, and resins derived
50 from it (BFDGE : Bisphenol F diglycidyl ether) and bisphenol-S [bis(4-
51 hydroxyphenyl)sulfone, (BPSU)] are also used for similar purposes as BPA as well as
52 resins derived from it.

1 Finally, halogenated derivatives of BPA, such as tetrabromobisphenol-A [2,2-bis(4-
2 hydroxy-3,5-dibromophenyl)propane, (TBBPA)] and tetrachlorobisphenol-A [2,2-bis(4-
3 hydroxy-3,5-dichlorophenyl)propane, (TCBPA)] are both widely used as flame-retardants
4 for building material, paints, plastic products including epoxy resin, electronic circuit
5 boards, and other electronic equipment.

6 This opinion does not include risk assessment of these BPA derivatives and the
7 alternative substances. However, BPA-derivatives are considered, as they can release
8 BPA.

9 The main focus of this opinion is adverse effects and risk assessment of exposure to BPA
10 via medical devices, for which the exposure routes are not limited to oral applications.
11 Information on adverse effects after oral exposure to BPA is included only regarding the
12 additional literature published after the existing evaluations between 2010 and 2013. For
13 other routes of exposure a more comprehensive overview is presented including
14 literature before 2010.

15

16 **3.2. Methodology**

17

18 This Opinion of SCENIHR is concerned with the analysis of the evidence for the potential
19 for BPA exposure due to the use of medical devices to have adverse effects on human
20 health, from the perspectives of both scientific plausibility as well as experimental,
21 clinical and epidemiological data. Recent scientific evidence is reviewed to determine
22 whether it justifies any reason for concern with regard to health risks associated with the
23 use of BPA based polycarbonates, resins and/or BPA containing PVC.

24 The SCENIHR has considered evidence derived from a wide variety of sources, including
25 peer-reviewed scientific and medical literature and published reports of institutional,
26 professional, governmental and non-governmental organisations. In common with the
27 usual practice of SCENIHR, no reliance has been made on unpublished work or publicly
28 available opinions that are not scientifically based. Due to the availability of extensive
29 peer reviewed scientific publications with respect to BPA, it has not been necessary to
30 rely on single case or anecdotal reports in establishing this Opinion.

31 The SCENIHR has reviewed as much evidence as possible and evaluated potential risk of
32 the use of BPA in medical devices against the clinical benefit of the use of such medical
33 devices. In a weight of evidence approach, lines of evidence or hypothesis for causality
34 are evaluated based on the supportive studies. When a line of evidence is consistently
35 supported by various studies (i.e. evidence is independently reproduced in different
36 studies) causality is likely between the observed effect and exposure to the substance.
37 Relevance, strength and weaknesses of the studies evaluated are considered. The weight
38 of evidence (SCENIHR, 2012) can be categorized as follows:

39 **Strong overall weight of evidence:** Coherent evidence from human and one or more
40 other lines of evidence (animal or mechanistic studies) in the absence of conflicting
41 evidence from one of the other lines of evidence (no important data gaps).

42 **Moderate overall weight of evidence:** good evidence from a primary line of evidence
43 but missing evidence from several other lines (important data gaps).

44 **Weak overall weight of evidence:** weak evidence from the primary lines of evidence
45 (severe data gaps).

46 **Uncertain overall weight of evidence:** due to conflicting information from different
47 lines of evidence that cannot be explained in scientific terms.

48 **Weighing of evidence not possible.** No suitable evidence available.

49 The evidence for the presence of a causal relationship between exposure to BPA due to
50 the use of medical devices and adverse effects are discussed in the chapters below. In

1 addition, the risk will be evaluated against the potential benefit of the use of the various
2 medical devices.

3

4 **3.3. Chemistry of BPA**

5

6 **Identification of the Substance**

7

8 CAS-No: 80-05-7

9 EINECS No: 201-245-8

10 IUPAC name: 2,2-bis(4-hydroxyphenyl)propane

11 Molecular weight: 228.29

12 Molecular formula: C₁₅H₁₆O₂

13 Structural formula: _

14

15 Smiles notation: Oc(ccc(c1)C(c(ccc(O)c2)c2)(C)C)c1

16

17 Synonyms:

18 BPA (Common abbreviation)

19 2,2-Bis(4-hydroxyphenyl)propane

20 2,2-Bis(p-hydroxyphenyl)propane

21 p,p'-Isopropylidene-bisphenol

22 p,p'-Isopropylidene-di-phenol

23 Phenol, 4,4'-Isopropylidene-di

24 Diphenylol Propane

25 Parabis (Trademark)

26 Bis (4-hydroxyphenyl) dimethyl methane

27 Bis (4-hydroxyphenyl)propane

28 Dian (Trademark)

29 Dimethylmethylene-p,p'-di-phenol

30 Dimethyl Bis(p-hydroxyphenyl)methane

31 4,4'-Dihydroxy-2,2'-diphenyl propane

32 4,4'-Dihydroxydiphenyldimethyl methane

33 4,4'-Dihydroxydiphenyl propane

34 β-Di-p-Hydroxyphenyl propane

35 p,p'-Dihydroxydiphenyldimethyl methane

36 p,p'-Dihydroxydiphenyl propane

37 2,2'-(4,4'-Dihydroxydiphenyl) propane

38 4,4'-Dihydroxydiphenyl-2,2'-propane

39 2,2'-Di(4-hydroxyphenyl) propane

- 1 2,2'-Di(4-phenylol) propane
- 2 4,4'-Isopropylidene bisphenol
- 3 4,4'-(1-methylethylidene)bisphenol

4

5 **Purity**

6 The EU Risk Assessment Report of 2003 states a purity of BPA as being 99-99.8% with
7 the impurities typically including phenol (<0.06%), other isomers of bisphenol-A
8 (<0.2%) and water (<0.2%) (ECB 2003). Terasaki *et al.* (2004) examined four samples
9 of industrial BPA with stated purities of 97% to 98% and a sample of laboratory grade
10 BPA (99+% purity) and they found fifteen trace impurities. However, it is presently
11 unknown whether such impurities are also present as such in medical devices, or if they
12 participate in the polymerization reactions, and, therefore, whether or not they may
13 leach out from the manufactured medical devices.

14

15 **Additives**

16 There are no stated additives used with BPA.

17

18 **3.4. Physico-Chemical Properties**

19

20 The physical-chemical properties of BPA are described below (Staples *et al.*, 1998;
21 Cousins *et al.*, 2002; ECB 2008). Bisphenol A is a moderately polar substance (log Kow
22 3.3-3.5) with good solubility in most organic solvents and moderate solubility in water
23 (300 mg/L at 25°C). It has a high boiling point and a low vapour pressure at ambient
24 temperatures. BPA has two unhindered phenolic hydroxyl groups and hence, it exhibits
25 chemical properties typical of simple phenols, such as a slightly acid character and
26 susceptibility to oxidation. At physiological pH the BPA molecule is predominantly in the
27 non-ionised form. The two phenolic hydroxyls are the main reaction centres of BPA and
28 products derived from BPA involve reactions via these groups.

29 Main physical-chemical properties of BPA.

30 Physical State at STP:	White solid flakes or powder
31 Melting Point:	155-157°C
32 Boiling point:	360°C at 1013 kPa
33 Vapour pressure:	5.3x10 ⁻⁹ kPa at 25°C
34 Solubility in water:	300 mg/L at 25°C
35 Octanol-water partition coefficient:	Log Kow 3.3-3.5
36 Acid dissociation constant:	pK _a 9.6 - 11.3

37

38

39

40

41

42 **3.5. Overview of existing assessments on BPA**

43

44 **3.5.1. Existing assessments**

45 The toxicological profile of BPA has been described in several reports of EFSA (2006,
46 2010), USA National Toxicology Program (NTP-CERHR, 2008), FAO/WHO (2010), ANSES
47 (2011) and in several reviews (Arnich *et al.*, 2011; Hengstler *et al.*, 2011). The EFSA
48 opinions issued to date are focused on the oral route of exposure, because it was found

1 to be the most relevant for risk assessment of food/feed. In the 1980s, a series of sub-
2 chronic and chronic studies were performed by the USA-NTP and U.S. EPA (US
3 Environmental Protection Agency), whereby the majority of the studies used the oral
4 route. Doses ranged from 250 to 4000 ppm (= 250 to 4000 mg/kg feed) corresponding
5 to maximum exposure dose of approximately 400 mg/kg b.w./day³ in rats and from 5000
6 to 25,000 ppm (= 5000 to 25,000 mg/kg feed) corresponding to maximum exposure
7 dose of approximately 5600 mg/kg b.w./day in mice (US-NTP, 1982). Doses higher than
8 1000 ppm (= 1000 mg/kg feed, which corresponds to approximately 100 mg/kg
9 b.w./day) led to decreased body weight in both sexes of rats. Doses higher than 9000
10 ppm (= 9000 mg/kg feed), the total dose depending on the food intake, led to an
11 increase in mean liver weight in dogs (EC 2003).

12 **3.5.2. Controversial issues**

13 It is recognized that regarding the risk assessment of BPA after oral uptake, several
14 controversies still need to be addressed.

15 In monotonic responses, the effect either increases or decreases over the full dose range
16 tested. The controversy is on-going whether BPA exhibits non-monotonic dose-response,
17 and whether the effect seen with low doses but not with high doses is really present
18 (Goodmann *et al.*, 2009; Vandenberg *et al.*, 2012; Rhomberg and Goodman, 2012).
19 Furthermore, there are diverging views whether BPA causes adverse effects in humans
20 related to its estrogenic activity at exposure levels present in the population (Borrell,
21 2010; Aschberger *et al.*, 2010; Taylor *et al.*, 2011; Yang *et al.*, 2009). Increases in
22 prostate weights of 30-35 % compared to controls were observed in F₁ adult mouse
23 offspring which were exposed *in utero* by orally dosing dams with 2 and 20 µg/kg/day
24 BPA from gestational days 11 through 17 (Nagel *et al.*, 1997). Other studies did not
25 reproduce the result (Ashby *et al.*, 1999; Cagen *et al.*, 1999). In addition, it is not yet
26 clear whether developmental exposure to BPA can affect adiposity, glucose or insulin
27 regulation, lipid profiles or other endpoints related to diabetes or metabolic syndrome
28 (Miyawaki *et al.*, 2007; Somm *et al.*, 2009; Alonso-Magdalena *et al.*, 2010; Alonso-
29 Magdalena, *et al.*, 2011; Nadal 2013; Ryan *et al.*, 2010; Wei *et al.*, 2011; MacKay *et al.*,
30 2013; Angle *et al.*, 2013). Other studies dealing with these endpoints had results which
31 were contradictory to the findings of the above cited authors (e.g. Anderson *et al.*,
32 2013).

33 Furthermore, effects on mammary tissue (e.g. proliferative changes in mammary gland,
34 Ayyanan *et al.*, 2011; Kass *et al.*, 2012; Tharp *et al.*, 2012), were demonstrated and are
35 difficult to interpret in the context of human health.

36 Lastly, neurological, neurodevelopmental and neuroendocrine effects are additional areas
37 of uncertain results because it is not clear whether the effects shown by these animal
38 studies -even when scientifically sound results have been obtained- can be translated to
39 the human population (see below).

40 Another issue is related to findings from observational epidemiological studies,
41 suggesting associations between BPA exposure (mainly measured as spot urine
42 concentrations) and chronic health effects such as coronary heart disease, reproductive
43 disorders and others. However, the design of observational studies does not allow the
44 establishment of causal relationships.

45 A minority view to the EFSA BPA assessment (EFSA 2010) expressed concerns resulting
46 from studies published after 2006 in which animals were exposed during prenatal and
47 postnatal development. The studies appear to indicate that adverse effects, in particular
48 brain receptor programming, immune modulation and susceptibility to breast tumours,
49 might occur at doses below the current No Observed Adverse Effect Level (NOAEL).

³ The indicated dose levels in mg/kg b.w./day were calculated using the general conversion factor of 0.1 for rats and 0.2 for mice (EFSA 2012a)

1 Some of the controversial issues were recently discussed by Shelnutt et al. (2013)
2 including a summary on the current regulatory status of BPA, a review of recent
3 pharmacokinetic studies and studies on neurobehavioral effects, and how this new
4 information addresses the National Toxicology Program's NTP's 2008 finding of "some
5 concern" (Shelnutt *et al.*, 2013). The species differences in pharmacokinetics of BPA were
6 recognized as was the lack of certain neurobehavioral effects of BPA. In addition, ongoing
7 and planned research in cooperative studies on BPA between NTP/FDA and National
8 Institute of Environmental Health Sciences (NIEHS) in the USA are described (Shelnutt et
9 al., 2013).

10

11 **3.5.3. Conclusion**

12 The exposure to and toxicity of BPA have been investigated in depth and a multitude of
13 studies have been published. In the risk assessments carried out to date, less interest
14 has been directed towards studies in which the BPA dose was given via non-oral routes
15 (e.g. subcutaneous, dermal).

16 In the existing evaluations, the following conclusions have been drawn for oral route of
17 exposure to BPA:

18 - NOAEL of 5 mg/kg b.w./day in rats

19 - Tolerable Daily Intake (TDI) of 50 µg/kg b.w.

20 - developmental toxic effects only observed at doses with severe maternal toxicity in rats
21 and mice

22 - an overall NOAEL for reproductive toxicity of 50 mg/kg b.w./day in rats and mice

23 - in terms of toxicokinetics, there is a difference between rats and humans (the latter
24 presenting a shorter half-life) as well as between the oral and the parenteral route of
25 exposure

26 - due to the first pass effect, after oral uptake, the systemic exposure to free BPA is a
27 small fraction of the external dose in all species

28 - there remain unresolved issues in the risk assessment of BPA after oral and
29 subcutaneous uptake

30 More recently, EFSA established a temporary (t)-TDI of 5 µg/kg b.w./day for oral
31 exposure to BPA (EFSA 2014). A bench-mark dose (BMD) evaluation was used with the
32 BMDL₁₀ of 3.76 mg/kg b.w./day for kidney alterations as a critical effect. The recently
33 calculated BMDL₁₀ of 3.76 mg/kg b.w./day and the NOAEL of 5 mg/kg b.w./day, both
34 based on the Tyl et al.(2002, 2008) multigeneration reproductive toxicity studies using
35 oral exposure, are very similar, although conceptually different from a toxicokinetic point
36 of view. Indeed, the internal exposure of the organs is different: hepatic exposure is
37 presystemic, whereas renal exposure is systemic. The doses at the site of action (i.e.
38 liver and kidney) differ after the oral route of exposure because of the biotransformation
39 occurring in the liver which results in a lower dose of free BPA for kidney exposure. The
40 SCHENIR supports the use of the newly developed t-TDI for the risk assessment of
41 medical devices.

42

43 **3.6. Identification of the relevant medical devices**

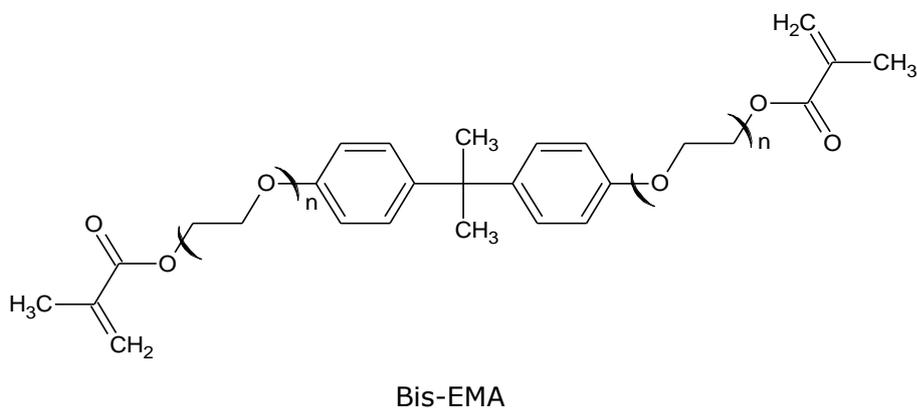
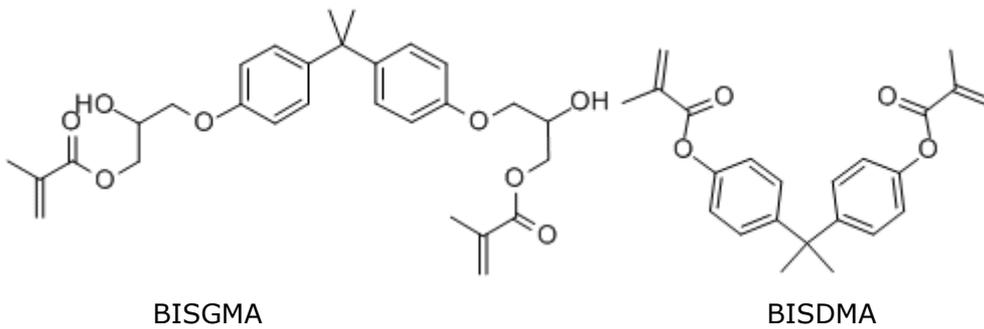
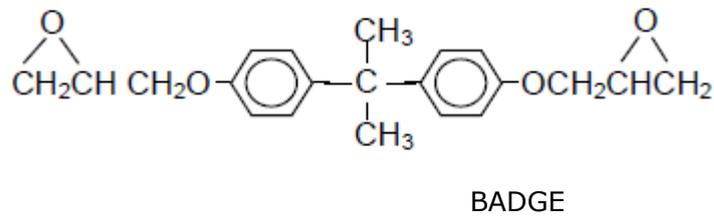
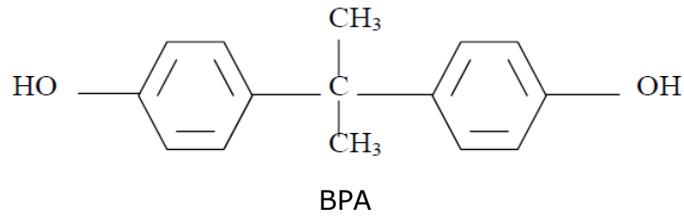
44

45 **3.6.1. Medical devices**

46 Medical devices based on polycarbonate and polysulfone, due to their chemistry, may
47 contain BPA residues, whereas others like PVC may or may not contain BPA residues
48 depending on their production method. In addition, some other BPA-derivatives (such as

1 epoxy resins) are used specifically in dental materials (Fig. 1). Annex I lists medical
2 devices which may contain BPA.

3



15 Figure 1: BADGE: Bisphenol A diglycidyl ether; Bis-GMA: Bisphenol A glycidyl
16 methacrylate; Bis-DMA: Bisphenol A dimethylacrylate; Bis-EMA: ethoxylated bisphenol A
17 dimethacrylate

18

19 **3.6.2. Presence in and release of BPA from medical** 20 **devices**

21 Potential exposure to BPA from polycarbonate articles can derive from the incomplete
22 polymerization of the monomer during the manufacturing process as well as from the

1 breakdown or hydrolysis of the polymer under certain conditions (ECB 2003, EC 2010a,
2 Mercea 2009).

3 It is known that polymerization of monomers is rarely complete, and un-reacted
4 monomers are almost always released from polymer resins (Begley *et al.*, 1990, 2005;
5 De Meulenaer and Huyghebaert 2004). The major factor influencing residual amounts of
6 BPA is the employment of incorrect operating conditions during the processing step. The
7 presence of water in the polycarbonate before processing, the use of excessively high
8 processing temperatures and the use of additives that promote degradation are the
9 major causes of polycarbonate degradation during processing. However, the residual BPA
10 in polycarbonate is likely to be low when proper processing and handling conditions are
11 used. For instance, in polycarbonate articles used for food contact, the residual content is
12 usually less than 10 µg/g of polycarbonate (ECB 2003). The presence of residual BPA in
13 polycarbonate is supported by available results concerning migration of BPA mainly into
14 food simulants (water, 3% acetic acid, 10% aqueous ethanol, olive oil) but also into
15 foods, showing levels of BPA of up to 50 µg/L of infant formula from baby bottles (EC
16 2010b).

17 Moreover, breakdown or hydrolysis of the polycarbonate polymer after manufacturing
18 can occur, thus giving rise to the free monomer from the polymer available for exposure.
19 Factors affecting BPA release from polycarbonate (PC) used in food contact materials
20 have been studied and recently reviewed (Aschberger *et al.*, 2010; EC 2010b; Beronius
21 and Hanberg, 2011; Geens *et al.*, 2012). Length of contact time, high temperatures and
22 high pHs (hydroxide aqueous solutions) increase the release, whereas the role for other
23 factors, which have been suggested as possible releasing facilitators (i.e the composition
24 of mineral water or the repeated use (ageing) of the articles) has not been clearly
25 demonstrated. Residual alkaline detergent remaining on the surface of the polymer after
26 dishwashing may increase the release of BPA. Reactions with amines and ethanol of
27 polycarbonate were observed (Maia *et al.*, 2010; Sajiki & Yonekubo, 2004; Biles *et al.*,
28 1997; Jie *et al.*, 2006)

29 Importantly, studies on BPA content and its leaching from polycarbonate medical devices
30 in their actual use are limited.

31 Polysulfones are polymers obtained by reaction between a diphenol and bis(4-
32 chlorophenylsulfone) producing an ether-oxide. The diphenol could be either BPA or 1,4-
33 dihydroxybenzene. Thus, in case of use of BPA during this reaction, leaching of BPA is
34 then possible. They are mostly used in medical devices as membranes, especially in
35 hemodialysers.

36

37 PC pellets used for the manufacture of medical devices

38 Haishima *et al.* (2001) found a total BPA content of 4.0 and 7.2 mg/kg in two types of PC
39 pellets, using tetrahydrofuran for the dissolution of the polymer. Additionally, one type of
40 polysulfone (PSU) was analysed resulting in a significantly higher value: 34.5 mg/kg.
41 Furthermore, 2 PC casings lacking hollow fibres were extracted with water and methanol
42 (10 mL each, 16h) at room temperature, while shaking. The extraction power of
43 methanol was evident from the results: BPA released was 11.7 and 13.7 ng/casing by
44 water extraction, and 296 and 345 ng/casing by methanol extraction.

45 Some data on BPA content in medical devices and/or PC pellets used for the
46 manufacturing of medical devices were submitted in the Call for Information⁴. Low
47 amounts of BPA were observed in PC pellets. The amount of total BPA extracted (24h
48 soxhlet extraction in isopropanol) from PC pellets (3 replicates) used to manufacture

⁴ For the data submitted in response to the Call for Information the information was available as far as provided by the applicant and complete study reports were not available for evaluation by SCENIHR.

1 medical devices, as well as from a finished trocar tubing was 0.2-0.3 mg/kg. No
2 significant difference was found in the amount found in the pellets and in a finished
3 device trocar sleeve tested. However, BPA could not be detected when using a 0.9%
4 sodium chloride solution at 37°C for different extraction time intervals from 1h up to
5 168h (Limit of Detection, LOD, approximately 2 mg/kg) using conditions selected to
6 mimic human physiological conditions. Notably, the LOD for saline analysis is 10 times
7 higher than the amount observed using soxhlet extraction in isopropanol. The
8 assumption that 100% of BPA is released in one day is assumed to represent the worst-
9 case scenario.

10 BPA could be extracted (4-5.8 mg/kg) only from PC-drinking cups,. In PC pellets and a
11 PC-containing trocar, no BPA was detected in a follow-up study of medical grade PC when
12 extracted with isopropyl alcohol and ethanol to account for potential accumulation in
13 blood lipids (LOD approximately 0.5 mg/kg material). After sterilization by gamma
14 radiation, similar results were obtained using the same PC-containing materials
15 (submitted through the Call for Information).

16

17 Medical Devices used for air and/or gas circulation

18 In hoods of neonatal incubators and neonatal intensive care units (NICU), BPA could not
19 be detected (LOD approximately 50 µg/m³, ISO 16000-6 method) in the analyzed gases
20 after a prolonged period of contact time of the material with the breathing gas⁵.

21

22 Hemodialysers

23 Several studies have reported the leaching of BPA from hemodialysers, though the
24 number of devices in each study was limited.

25 Four hemodialysers, composed of a combination of PC casing and cellulose acetate
26 hollow-fibres (1 device), PC casings and PSU (polysulfone) fibres (2 devices), and
27 polystyrene and PSU (1 device), were tested for BPA released (Haishima *et al.*, 2001).
28 Water and bovine serum (250 mL each), the latter used as a simulant for human blood
29 circulating into hollow-fibres during hemodialysis, were circulated at 10 mL/min for 16 h
30 at room temperature in the four devices tested. BPA recovered ranged from 3.78 to
31 141.8 ng/module using water circulation and from 140.7 to 2090 ng/module when bovine
32 serum was used. The highest values of BPA released corresponded to the 2
33 hemodialysers tested consisting of PC casings and PSU fibres were 1 and 2 µg/module.
34 Moreover, a 17.2% (v/v) ethanol solution was found to extract comparable BPA amounts
35 as with bovine serum, reaching the maximum release after 2 to 4h circulation.

36 BPA concentrations of 83.3 ng/10 mg and 122.5 ng/10 mg in PSU and PEPA (polyester-
37 polymeralloy) hollow fibres, respectively, were reported (Murakami *et al.*, 2007). The
38 hollow fibres, taken from individual dialyzers, were crushed and dissolved in hexane.

39 Fink (2008) considered the leaching of substances (including BPA) from five different
40 types of dialyzers and PVC blood tubing. All the dialyzers had in their composition either
41 PC or PSU: PC housing and PSU-PVP blend membranes (n=2), PC housing and
42 polyamide-PSU blend membrane (n=1), and PP housing, PSU-PVP blend membrane
43 (n=2). The surface area range was 1.3 - 1.8 m². The blood and dialysate compartment of
44 each dialyzer was connected by 110 cm standard PVC tubes. Dialysis was simulated
45 using two different eluents (volumes ranging 230-410 mL), reverse osmotic water and
46 17.2% ethanol, the latter as a substitute of bovine serum (hence, simulating human
47 serum). Temperature, dialysis period and flow rate were adjusted to represent realistic
48 dialysis modalities: 37 °C, 230 mL eluate/min for 4 h and also for 24 h as the worst case
49 scenario. Three independent eluates with new dialyzers each time were obtained at each
50 elution condition. BPA was quantitated in all eluates by LC-MS/MS.

51 In agreement with the study of Haishima *et al.* (2001), higher levels were measured
52 when 17.2% ethanol was used (to simulate blood), ranging from 54.8 to 4299

1 ng/dialyser, whereas BPA levels were 6.4 – 71.3 ng/dialyser using water as eluent (Fink
2 2008). Other factors influencing the amount of leaching BPA were the type of dialyzer,
3 different batch of the same type, the size of the membrane surface and time of dialysis.
4 In general, the longer the dialysis time the greater the leaching. Additionally, an increase
5 in the surface area, when comparing dialyzers with the same material for housing and
6 membranes resulted in a higher amount of BPA extracted. The maximum of leaching BPA
7 was estimated to be 4.3 µg/dialyzer when circulating 17.2% ethanol for 24h (3.4
8 µg/dialyzer for 4h circulating time). Contribution of the PVC tubing to total BPA content in
9 the eluates was negligible, and the levels found were below the limit of quantification
10 (3.42 ng/mL). The results obtained with water and also with 17.2% ethanol were in the
11 range reported in the previous study by Hashima (2001), except for a single batch or a
12 type of dialyzer, which released almost twice the higher level reported before. However,
13 this discrepancy could be attributed to the different conditions used in both studies,
14 regarding temperature, duration and flow.

15 Krieter *et al.* (2013) have also reported release of BPA from 3 different dialyzers, one
16 with a 1.7 m² high-flux polyethersulfone membrane, and two with 1.3 m² polysulfone
17 membranes, high and low flux, respectively. All dialyzers had PC housing. BPA-free
18 sterile water (400 mL) was circulated through the blood and dialysate compartments for
19 3 h, at 250 mL/min, 37 °C and BPA was measured by ELISA. As found in other studies,
20 eluted BPA concentrations differed significantly between dialyzers, averaged (n=6) levels
21 found being 140.8 ± 38.7, 48.1 ± 7.7 and 6.2 ± 2.5 ng/dialyzer. These results are in the
22 range with those reported in other studies when using water as eluent (Hashima, 2001;
23 Fink, 2008). The highest BPA levels were eluted from the low-flux dialyzer with PS
24 membrane, and the lowest from the dialyzer with polyethersulfone membrane.

25 Leaching of BPA from PSU hollow fiber membranes used in hemodialyzers and
26 hemoconcentrators has also being recently reported (Cho *et al.*, 2012). The authors
27 studied the kinetic elution profile in ten multiple consecutive extractions with 1 L of
28 17.2% ethanol at a flow rate of 200mL/min, for 1 hour. Every hour the ethanolic solution
29 was refreshed with a new one. The experimental results were fitted to derive an equation
30 to predict the total leachable BPA. For a PSU membrane with a total surface area of 0.5
31 m² and weight of 7.9 g, the total leachable amount of BPA was estimated as 20.7 µg, and
32 95% of this was released after 10 consecutive extractions. Single prolonged (6 hours)
33 extraction tests (same conditions) were also performed on PSU membranes with surface
34 areas of 0.4 m² and 0.7 m², respectively. BPA concentrations were measured (LC/MS) at
35 different time points from 0.33 up to 6 hours. In agreement with the Haishima (2001)
36 study, the BPA released reached a plateau in approximately 2 hours (read values from
37 the figure in the publication are 1.3-1.4 ng/mL and 0.65-0.7 ng/mL for the 0.7m² and
38 0.4 m² PSU membranes, respectively). If the flow rate was decreased to half, the time to
39 reach the equilibrium increased to 4 hours, but the final concentration was not dependent
40 on the flow rate of the extraction solution.

41

42 Cardiopulmonary bypass

43 A study by Sakurai H. (2002, only abstract available in English) indicates the presence of
44 BPA in cardiopulmonary bypass circuits as BPA leaching was observed during open heart
45 surgery (see exposure section).

46

47 Effect of sterilization on medical devices:

48 Sterilization of medical devices is usually performed either by steam, irradiation, gas
49 (ethylene oxide) or "gas-plasma" (hydrogen peroxide). Each method may interact with
50 the content of the medical device, creating some by-products, as sterilization may
51 modify/deteriorate the polymer component of the medical device which as result may
52 modify the BPA release properties. In the specific case of plastics and polymers, effects
53 are described since long time and extensive reviews are available in the literature

1 (Mendes *et al.*, 2007; McKeen, 2012). These effects include alteration of resistance,
2 surface modification, release and/or modification of some components (Baker *et al.*,
3 2000; Brown *et al.*, 2002).

4 Shintani (2001) reported migration of BPA from four dialyzers into a saline extract for
5 different sterilization methods and for different devices. The procedures used for
6 sterilization were by autoclaving (121°C, usually 15-20 min) and gamma radiation at 25
7 KGy. BPA levels found were 0.1-0.2 ppb (µg/L) in the saline extract.

8 In another study (Shintani *et al.*, 2003), BPA content after extraction in 4 mL was
9 determined by LC-MS-UV in one PC (119 mg/kg) and three PSU membranes (43, 207
10 and 247 mg/kg) sterilized with ozone gas (gas concentration 300 ppm, RH 80%, T 35°C)
11 by extraction with ethanol. BPA was not detected after extraction of unsterilized and
12 steam-sterilized (121°C, 15 min) PC and PSU membranes (less than 4 – 11 mg/kg,
13 based on the weights of the tested membranes which were approximately 20 mg and 7
14 mg for PSU and PC, respectively). Sterilization by means of ethylene oxide was not used
15 in this study.

16

17 Dental materials

18 BPA exposure from dental materials is a concern, especially from dental sealants (Olea *et*
19 *al.*, 1996), but also from composites and other polymer-based restorative materials (Van
20 Landuyt *et al.*, 2011, 2013). BPA, as such, is not a component in dental materials⁵, but
21 may be present as a contaminant or degradation product. Some dental materials are
22 produced using monomers synthesized from BPA, such as Bis-GMA, Bis-EMA and
23 incidentally Bis-DMA (all methacrylates), and BADGE (epoxy), see Figure 1. Only Bis-
24 DMA, which has an ester linkage, can be hydrolysed to release BPA. The ether linkage in
25 Bis-GMA is stable (Schmalz *et al.*, 1999). The reports on BPA leaching from dental
26 materials vary extensively, but it seems that only a few specific products/brands were
27 detected as a source of BPA (Arenholt-Bindslev, 1999). One study analyzing 28 different
28 materials found BPA in only one of them (Lewis, 1999).

29 In 2011, Van Landuyt and co-workers published a systematic review of 71 publications
30 dealing with the release of substances from resin-based materials of which 11 studies
31 investigated the release of BPA. They considered exclusively *in vitro* incubation in
32 aqueous and organic solvents, for at least 24 hours, without a pre-incubation process.
33 The review reported a few studies with BPA-release in water-based solutions, the highest
34 individual value being 67 nmol/mm² surface area of the resin bonding material as
35 published by Mazzaoui *et al.* (2002). Notably, this amount was measured on the resin
36 bonding material, which is an adhesive normally not exposed to saliva.

37 One study (Takahashi *et al.*, 2004) found no release of BPA into water even at elevated
38 temperature (65 °C, 24h) from PC crowns, but release of 0.28 µg (± 0.02) from 100 mg
39 material into ethanol (65 °C, 24h). The amount of BPA released into other organic
40 solvents was 4.72 µg (acetic acid) and 8.80 µg (acetonitrile), both at 65°C, 24h. No
41 LOD/LOQ was declared in the study.

42

43 Adhesives in orthodontic applications

44 Orthodontic treatment involves using fixed or removable appliances (dental braces) to
45 correct the positions of teeth. The success of a fixed orthodontic appliance depends on
46 the attachments (brackets and bands) being attached securely to the teeth so that they

⁵ At least one manufacturer has actively informed during the call for information that their products have no additions of BPA:

http://multimedia.3m.com/mws/mediawebserver?mwsId=66666UF6EVsSyXTtNXTEnxTEEVtQEVs6EVs6EVs6E666666--&fn=bpa_letter.pdf

1 do not become loose during treatment. A number of epoxy-resin based adhesives are
2 available to attach bands to teeth. Eliades and co-workers quantitatively characterized *in*
3 *vitro* BPA released from orthodontic adhesives after artificial accelerated aging (Eliades *et*
4 *al.*, 2007). No trace of BPA was identified for either adhesive across all time intervals,
5 implying that, if present, the amount of BPA did not exceed the detection limit of the
6 analytical technique (0.1 mg/kg of adhesive).

7 Eliades and co-workers also quantified BPA released from a light-cured orthodontic
8 adhesive used to bond lingual fixed retainers (Eliades *et al.*, 2011). Eighteen recently
9 extracted premolars, divided into 3 groups of 6 teeth each, were embedded in plaster in
10 an arch shape. A light-cured adhesive was bonded to a 3-strand, heat-treated twist flex
11 wire adjusted to the lingual surface of the teeth, and the arches were immersed in
12 double-distilled water for 10, 20, and 30 days. The concentration of BPA in the 3 extracts
13 was investigated with gas chromatography-mass spectroscopy; all assays were
14 performed in triplicate, and the results were averaged. Measurable amounts of BPA were
15 identified for all groups, with the highest value (2.9 µg/L) found in the immersion media
16 of the 30-day groups (six teeth embedded in plaster and arranged in an arch mimicking
17 the shape of of the six mandibular anterior teeth), whereas the control (tooth storage
18 solution) had 0.16 µg/L. The total release could not be determined as the incubation
19 volume was not presented in the paper. The level in the control samples indicates
20 background levels of BPA in the lab equipment used. In conclusion, BPA released from a
21 light-cured adhesive used to bond lingual fixed retainers might be assigned to the
22 application mode of the material that differs from conventional use.

23 As orthodontic bonding resins are exposed to oral fluids and are in contact with tissues
24 throughout treatment, leaching from resin can occur at 2 times: during the setting period
25 of the resin and later when the resin is degraded. Leaching during the first process is
26 related to the degree of conversion. Sunitha *et al.* (2011) used high-performance liquid
27 chromatography to assess BPA released from an orthodontic adhesive with various light-
28 curing tip distances and to correlate the release to the degree of conversion. BPA release
29 was greater in specimens cured with a greater light-curing tip distance. The degree of
30 conversion decreased with increased light-curing tip distances. A negative correlation was
31 found between BPA release and degree of conversion.

32 Watanabe (2004) analyzed the leaching of BPA in water at 37°C for 12, 16, 25, and 34
33 months from brackets, denture base and temporary crown PC materials. The total BPA
34 released was found to be 37.4 (3.56), 2.2 (0.03), and 2.8 (0.32) µg/g, respectively. The
35 BPA content in the materials was shown to increase after 34 months (max 472 µg/g for
36 brackets), and the MW of the PC to decrease. The BPA content in retrieved PC brackets
37 was in the range 38 µg/g (18 months) to 697 µg/g (40 months).

38 Watanabe *et al.* (2001) analyzed (HPLC/UV-DAD or fluorescence) five retrieved PC
39 brackets from five patients for their content of BPA. At retrieval points ranging from 5-15
40 months, the BPA content in the brackets were found in the range 56-102 µg/g bracket.
41 (One bracket weighs approximately 22 mg). In addition, they measured the *in vitro*
42 leaching of BPA from the brackets in water at 37 °C and 60°C for 3, 6, 9, 12 months and
43 1, 2, 4, 6, 10, 14 weeks, respectively. The release after 12 months reached 3.8 µg/g.
44 The release after 14 weeks reached 35 µg/g. The BPA content in PC brackets immersed
45 in water increased to a maximum of 434 µg/g (14 wks, 60°C). Calculations of exposure
46 (3.8 µg/g, 5-15 months, 28 brackets, 50 kg b.w.): daily BPA intake of 0.1-0.3 ng/kg/day,
47 as given by the authors.

48

49 Recently, Kloukos *et al.* (2013) reviewed all the publications on BPA leaching from
50 orthodontic adhesive resins and polycarbonate brackets. The objective of this systematic
51 review was to assess the short- and long-term release of components of orthodontic
52 adhesives and polycarbonate brackets in the oral environment. Eleven studies met the
53 inclusion criteria and all were observational studies conducted *in vivo* or *in vitro*. The BPA
54 released from orthodontic bonding resins was found to be between 0.85 and 20.88

1 ng/mL *in vivo* and from traces to 65.67 ppm (mg/L) *in vitro*. Polycarbonate brackets
 2 released amounts of 22.24 µg per gram in ethanol solution and 697 µg per gram after 40
 3 months in water. The available evidence on this topic derived from observational *in vivo*
 4 and *in vitro* studies that represent a moderate level of evidence. The variety of setups
 5 and the different units allied to the diversity of reporting among studies did not allow
 6 calculation of pooled estimates (Table 1).

7

8 Table 1 BPA released in experimental media (*in vitro*)

9

Reference	Orthodontic material	Time at sampling	BPA concentration
Sunitha <i>et al.</i> , 2011	Light-cured adhesive resin	Day 7	65.67 ppm (mg/L)
Eliades <i>et al.</i> , 2011	Light-cured adhesive	30-days exposure	2.9 µg/L (control group: 0.16 µg/L)
Watanabe 2004	PC brackets	34 months (immersion in water, 37 °C)	37.4 µg/g
Watanabe <i>et al.</i> , 2001	PC brackets	12 mo. 37 °C Immersion in water 14 weeks 60 °C Immersion in water	3.8 µg/g 35.0 µg/g
Suzuki <i>et al.</i> , 2000	PC brackets (n=4)	Crushed brackets in ethanol solution	22.24 µg/g

10

11 Notably, with a mean weight of approximately 40 mg and a maximum number of 24
 12 applications, the total weight of brackets potentially applied is approximately 1 g
 13 material.

14

15 **Bone cements**

16 Bi-functional methacrylates based on bisphenol-A-glycidyl dimethacrylate (BisGMA) or
 17 triethylene glycol dimethacrylate (TEGDMA) may also be applied in bone cements (Vallo
 18 and Schroeder, 2005). There are commercially available cements that comprise three
 19 main resins, BisGMA and ethoxylated BPA dimethacrylate (BisEMA) and TEGDMA as a
 20 viscosity modifier and reinforcing particles. As BPA may be present as potential
 21 impurity/residue, and tens to hundreds of grams of these bone cements are used per
 22 treatment, this may result in a considerable BPA release. However, to date no data exist
 23 on BPA release from these new bone cement materials.

24

25 **3.6.3. Conclusions**

26 Bisphenol A can be present in medical devices as residue from an (incomplete)
 27 polymerization process or result from the hydrolysis of the polymer.

1 Bisphenol A can be extracted from medical devices consisting of polycarbonate and/or
2 polysulfones, the latter mostly being used in the form of membranes. BPA extraction can
3 be performed *in vitro* with water, methanol or organic solvents resulting in dissolution of
4 the product. Extraction in methanol results in higher release of BPA compared to water
5 extraction. For PC casings BPA release in water was between 11 and 14 ng/casing, while
6 in methanol the release was between 296 and 345 ng/casing. Results for PC pellets used
7 for the production of medical devices were 4 to 7 mg/kg after dissolution of the pellets.
8 In the Call for Information, for PC drinking cups values of 4-6 mg/kg were submitted. So,
9 PC used for the production of medical devices seems to have BPA levels similar to those
10 of PC commonly used as food contact materials.

11 In hemodialyzers, water and bovine serum circulation resulted in a BPA recovery of 4 to
12 142 ng/module for water and 141 to 2090 ng/module for bovine serum, again indicating
13 that water is not the best medium for BPA extraction. This was confirmed by other data
14 showing BPA release of 6 to 71 ng/dialyzer in water and 55 to 4300 ng/dialyzer in 17.2%
15 ethanol. Low water extraction was observed for three different dialyzers being 141, 48
16 and 6 ng/dialyzer, respectively. In hollow fibres isolated from individual dialyzers and
17 dissolved in hexane, BPA content was 8.3 to 12.2 µg/g (mg/kg) material. The highest
18 values of BPA released corresponded to the 2 hemodialyzers tested that consisted of PC
19 casings and PSU fibres were 1 and 2 µg/module. After sterilization procedures, some BPA
20 may have already been released from the dialyzers.

21 The highest amount of BPA for dental materials measured was 67 nmol/mm² which
22 amounts to 15 µg/mm² for a resin bonding material which is commonly not exposed to
23 saliva. For PC orthodontic brackets, the BPA release varied between 22 µg/g (crushed
24 brackets) to 697 µg/g retrieved after 40 months of use by patients. In general, there was
25 very limited information provided to assess the reliability of available data.

26

27

3.7. Exposure scenarios

28

3.7.1. Knowledge on BPA exposure

29 Most people are exposed to BPA through the diet. Bisphenol A in food and beverages
30 accounts for the majority of daily human exposure (Wilson *et al.*, 2007; Chapin *et al.*,
31 2007; Vandenberg *et al.*, 2007; EFSA 2013). BPA may migrate into food from food and
32 beverage containers with internal epoxy resin coatings and from consumer products
33 made of polycarbonate plastic such as tableware, food containers, and water bottles. PC
34 was used in the production of baby bottles, but it was discontinued subsequent to
35 European regulation. BPA exposure results from either the release of un-polymerized
36 monomers or the slow decay of polymer bonds in polycarbonate leading to monomer
37 release into proximal foods and liquids. Air, dust, and skin contact with thermal paper,
38 are other possible sources of BPA exposure. Measured concentrations of BPA in human
39 blood, urine and other tissues have indicated that the majority of the population (91–
40 99%) has detectable levels of BPA-conjugates in their urine, confirming that exposure is
41 widespread in the human population (Vandenberg *et al.*, 2007; Calafat *et al.*, 2008).
42 Some studies indicate the presence of free BPA in blood; however, their reliability and
43 the toxicological relevance is a subject of intense academic and public debate (Calafat *et*
44 *al.*, 2005; Kang *et al.*, 2006; Vandenberg *et al.*, 2007; Dekant and Völkel, 2008; Calafat
45 *et al.*, 2008; Becker *et al.*, 2009; Bushnik *et al.*, 2010).

46 To date, there are limited data available on potential exposure to BPA from the use of
47 medical devices (Beronius and Hanberg, 2011).

48

3.7.1.1. Methods for measurement of internal exposure in humans

49

50

51

1 Biomonitoring directly measures human daily or cumulative exposures to xenobiotics
2 from all sources by the determination of biological fluids (blood, urine, breast milk,
3 saliva) or tissue concentrations of the chemical or its metabolites.

4 Regarding BPA, the analytical method used to detect both the parent compound and its
5 metabolites is crucial, especially at the low levels expected in biological samples, and
6 may represent a relevant source of differences among available studies. For
7 biomonitoring studies, independently of the detection method applied, the use of a stable
8 isotope-labeled BPA as an internal standard was suggested (WHO 2010) as the best
9 means to determine the effect of complex matrices (i.e. biological samples) and the
10 stability of BPA during analysis. The use of stable isotope-labeled BPA prevents
11 discrepancies due to contamination from external sources during sample collection and
12 processing (see below).

13 The features of different methods have been summarized by FDA (US FDA, 2010b): it
14 appeared that 1) among the methods for BPA analysis, the Mass Spectrometry (MS)-
15 based methods are considered the best and 2) data obtained by using immunochemical
16 methods (ELISA, RIA) are the least reliable because of low sensitivity, poor selectivity
17 due to cross reactivity with other phenols, and strong matrix effects (especially for urine
18 samples). Even when cross-reactivity with endogenous steroids and most analogous BPA
19 phenolic structures were reduced (Kaddar *et al.*, 2009), immunoassays tend to
20 overestimate serum BPA concentrations when compared to LC-MS/MS data.

21 Recently, the development of a new specific radioimmunoassay was described for the
22 direct measurement of BPA-glucuronide in urine without hydrolysis that requires only the
23 elimination of unconjugated BPA by one solvent extraction step (Harthé *et al.*, 2012). A
24 polyclonal anti-BPA antibody showing a 95% cross-reactivity with BPA-glucuronide and
25 insignificant cross-reactivity with most phenolic structures analogous to BPA was used.
26 The simple sample preparation phase can significantly reduce external contamination.
27 The method is reported to be valid, precise and accurate in the range of 0.05 mg/L to 5
28 mg/L, with a LOD comparable to GC and LC methods. It was reported that BPA-conjugate
29 concentrations measured with the radioimmunoassay method correlated with total BPA
30 concentrations measured by GC/MS in 32 urine samples ($r=0.86$) (Harthé *et al.*, 2012).

31 GC/MS methods for BPA analysis in blood and urine have been widely used (US FDA,
32 2010b), although they require derivatization or esterification of BPA (which is a non
33 volatile chemical). There is a time-consuming sample preparation phase with different
34 extraction and pre-concentration procedures that may increase the possibility of external
35 contamination of the sample itself (e.g. by plastic disposable lab devices or solvents).
36 Recently, classic GC-MS method based on solvent and solid phase extraction followed by
37 derivatization was adapted and validated for determination of BPA also in tissue samples,
38 such as human placental and fetal liver tissue (Zhang *et al.*, 2011) and in the human
39 maternal and umbilical cord blood serum (Kosarac *et al.*, 2012).

40 In contrast, HPLC methods can be used to analyse BPA without any pre- derivatization
41 step (Inoue *et al.*, 2001; Inoue *et al.*, 2003).

42 An LC/MS-MS method was developed to quantify both free and conjugated BPA in blood
43 and urine samples against an internal standard (d^{14} -bisphenol A-glucuronide) (Völkel *et al.*,
44 2005) and further modified to analyse different matrices (i.e. breast milk) (Ye *et al.*,
45 2006). D^{16} -BPA or $^{13}C_{12}$ -BPA can be used as an internal standard. The LOD of LC-based
46 method is in the range of 0.1-0.4 ppb (ng/g) in blood or urine samples.

47 With both GC and LC-based methods, an enzymatic hydrolysis step with beta-
48 glucuronidase is usually carried out, as BPA-glucuronide is not generally available as an
49 analytical standard. The requirement for two separate assays may lead to critical pitfalls
50 in terms of accuracy and external contamination (see below). To overcome these
51 problems, BPA-glucuronide may be isolated from urine samples, purified by flash
52 chromatography and characterized by mass spectrometry and NMR. The isolated BPA-
53 glucuronide was found to be suitable as analytical standard for the simultaneous

1 quantification of BPA and BPA-glucuronide in biological matrices by UPLC/MS/MS (Lacroix
2 *et al.*, 2011).

3 4 **3.7.1.2. Internal exposure to BPA in humans** 5 **from all routes**

6 A large number of biomonitoring studies to measure BPA in urine are available from
7 North America, Europe and South-east Asia (for overviews see Dekant and Völkel, 2008;
8 Vandenberg *et al.*, 2007, 2010a, 2010b; US FDA, 2010b; Geens *et al.*, 2012).
9 Importantly, in urine BPA is present in its conjugated form. Urinary biomonitoring data
10 provide information on the internal dose, which is the result of total BPA exposure,
11 independently from the sources: therefore, biomonitoring data in urine accounts not only
12 for dietary exposure, but also for non-food sources (e.g. medical devices, dust, thermal
13 and other kind of papers).

14 15 Methodological issues

16 The appropriateness of the study design (i.e. sampling time, most adequate fluid/tissue,
17 appropriate sampling and storage procedures) requires a detailed knowledge of the
18 biotransformation and toxicokinetics of any xenobiotic and/or its metabolites, as well as a
19 suitable analytical method. This is particularly relevant for BPA, with its rapid conjugation
20 and an elimination half-life time of only a few hours in blood. BPA concentrations in blood
21 decrease quickly after exposure (WHO, 2010).

22 In addition, blood concentrations of total BPA (free plus conjugates) determined at one
23 time point are not representative of an average exposure, because it is strongly
24 dependent on the time of blood sampling with respect to the exposure time. Since BPA
25 urinary excretion is almost complete within 24 hour after exposure and due to less
26 invasive sampling, urine is the matrix of choice for assessing daily exposure to BPA in
27 humans. Similar to blood, single spot urine samples serve as a measure of very recent
28 BPA exposures. Urine BPA levels depend on frequency of food intake, time of sampling
29 after food consumption, the last urination and urine production rate.

30 A 24 hour pooled urine collection is the most appropriate sample to determine average
31 daily exposure to BPA. However, in large cohorts, the high number of spot urine samples
32 collected will average out variations in urinary concentrations of total BPA among
33 individuals arising from temporal factors within a day. It has been reported that mean
34 values from studies reporting BPA concentrations in spot urine samples with a large
35 number of participants correlate well with those using cumulative excretion over 24
36 hours (Völkel *et al.*, 2008; WHO, 2010). Recently, Christensen *et al.* (2012) specifically
37 investigated whether spot sample concentrations of BPA are comparable to daily average
38 concentrations. Overall, spot urinary concentrations of BPA have variability roughly
39 similar with corresponding 24 hour average concentrations obtained from a comparable
40 population, suggesting that spot samples can also be used to characterize population
41 distributions of intakes, although caution should be applied in interpreting the high end of
42 spot sample data sets.

43 In order to estimate the daily BPA intake, the urinary concentrations of total BPA (free
44 and conjugated form) should be multiplied with the 24 hour urinary output (mL) to get
45 the daily excretion of BPA in ng/day, considering that excretion is almost complete in 24
46 hours (Völkel *et al.*, 2002, 2005). In addition to the urinary output, BPA concentration
47 can also be adjusted for daily creatinine excretion or for body weight. The correction for
48 urinary output is generally preferred over creatinine excretion (Lakind and Naiman,
49 2008), due to its high interindividual variation (over 1000 %) (Geens *et al.*, 2012). The
50 correction is quite relevant when comparing data obtained in different studies, although
51 the corrections are not always used or reported. However, the urine volume is also

1 related to several other factors such as liquid intake, physical exercise, and individual
2 health and lifestyle factors (WHO, 2010).

3 No study has investigated whether urinary excretion of BPA and other environmental
4 phenols differed by renal function. However, You *et al.* (2011) estimated the association
5 between renal function and urinary excretion of BPA and they suggested that urinary
6 excretion of BPA decreased with decreasing renal function. Because the associations
7 might differ by age or sex, further studies are necessary to replicate these results and
8 understand the mechanism.

9 For risk assessment purposes, both free BPA and its metabolites should be determined,
10 especially because most BPA in human is present as conjugates. Koch *et al.* (2012)
11 investigated the extent of BPA body burden in the German population from 1995 to 2009
12 based on 600 24 hour-urine samples and corresponding plasma samples from the
13 Environmental Specimen Bank. They concluded that the total BPA in urine is the most
14 appropriate and robust marker for BPA exposure assessment (if controlled for BPA
15 contamination). Data on unconjugated BPA in urine and unconjugated or total BPA in
16 plasma, where contamination or breakdown of the glucuronide cannot be ruled out, are
17 of no value for human exposure assessment.

18 Another potentially confounding effect in determining free BPA is the deconjugation of
19 BPA due to spontaneous hydrolysis and/or to bacterial contamination of the urine sample
20 which may cause hydrolysis (Schöringhumer and Cichna-Markl, 2007; Ye *et al.*, 2007;
21 Helander and Dahl, 2005).

22 As far as levels in urine sample are concerned, the reporting of data is a crucial issue for
23 comparing data, which are either reported with or without creatinine-adjustment to
24 correct for urine dilution, or adjusted by using 24 hour urine volume which is not
25 specified. However, a common result is that BPA conjugates (mainly glucuronides) are by
26 far the major BPA form present in human urine.

27

28 Possible artifacts in measurements of population exposure to BPA

29 The leaching of BPA from PC containers for sampling and storage, as well as plastic
30 disposable lab devices, sample workups and analysis (including HPLC capillary systems
31 and solvents) has been identified as a source of free BPA in biological samples. This kind
32 of contamination, possibly contributing to the concentration of free BPA, has been
33 reported in some studies (Markham *et al.*, 2010; Twaddle *et al.*, 2010; Ye *et al.*, 2011).

34 A recent survey conducted in France on pregnant women after delivery supported the
35 importance of urine sample collection methodology, but also relevant for this opinion, the
36 potential source of exposure and/or contamination due to the use of medical devices
37 (Vandentorren *et al.*, 2011). Women who had caesarean sections had much higher levels
38 of free and total urinary BPA than women giving birth naturally, the 95th percentile being
39 273.9 µg/L vs. 4.2 µg/L, with data adjusted for creatinine levels (Vandentorren *et al.*,
40 2011). Since the analytical methodology was correct and urine samples were stored in
41 polypropylene tubes at -4°C first and then at -80°C, prior to be analysed, contamination
42 with BPA from exogenous sources during storage can be excluded. However, the paper
43 does not clearly describe the way urine was collected, but the hypothesis was given
44 about the possibility that urinary collection devices were used in women having
45 caesarean section, suggesting that the source of higher BPA levels could be hospital-
46 based. Indeed, supplemental studies on the release of BPA from catheterization probes of
47 urine at room temperature for 12 and 24 hours clearly indicate the time dependence of
48 free BPA extraction from the probes up to approximately 300 µg/L. In this case, since the
49 major source of BPA is external to the body of patients, it can be concluded that
50 measured free BPA was due to contamination rather than to real exposure of patients via
51 medical devices.

52 The presence of analytical artefacts cannot be excluded in many of the available studies
53 that did not carry out the appropriate internal controls (Twaddle *et al.*, 2010).

1 Background contamination has been quantified by Doerge *et al.* (2010a) and found to be
2 as high as 2 ng/mL in buffer blanks, which may be responsible for the differences in free
3 BPA levels reported in many studies. This highlights the importance of sample
4 preparation and clean-up in the determination of traces of BPA in complex matrices such
5 as biological samples, to remove interfering matrix compounds and to increase selectivity
6 by using solvent extraction or SPE clean up or a combination of sol-gel immunoaffinity
7 columns containing anti-BPA antibodies (Cichna-Markl, 2012). Results obtained with the
8 administration to animals or volunteers of ¹⁴C-labelled or deuterated BPA are not affected
9 by background contamination and are the most reliable methods to perform the BPA
10 toxicokinetics studies and as input for the risk assessment. For measurements not using
11 isotope labelled BPA, a quality control on possible BPA contamination due to sampling
12 equipment and consumables used within the assay is necessary.

13 In addition, the variability of results obtained in biomonitoring studies to population
14 exposure of BPA depends also on human inter-individual differences, which include age,
15 diet, presence of pathologies (e.g. renal failure, hepatic dysfunction), genetic factors
16 (e.g. polymorphisms of UDPGT enzymes) as well as the pattern of exposure. Especially
17 during medical treatment, additional exposure to BPA may occur when using medical
18 devices consisting of polycarbonate components.

19 Human data on BPA exposure

20 Much of the concern for BPA exposure has come from studies reporting relatively high
21 levels of free BPA in human body fluids/tissues (Schönfelder *et al.*, 2002; Fernandez *et al.*,
22 2007; Lee *et al.*, 2008; Jimenez-Diaz *et al.*, 2010; Zhang *et al.*, 2011; Geens *et al.*,
23 2012).

24 The presence of high levels of free BPA in human specimens in those studies were
25 questioned on the basis of 1) the kinetics of BPA in humans (supported by data in
26 animals, including non human primates) showing <1% of total free BPA in serum at peak
27 levels and an almost complete and rapid excretion in human volunteers and 2) the low
28 aggregate intake estimates (mean<1 microg/kg b.w./day) made from urinary conjugated
29 BPA measurements (Lakind and Naiman, 2010). This raises questions in data generation
30 and evaluation that should be addressed, underlining the needs for a careful quality
31 control to be included in the study design to avoid/minimize any possible source of
32 artefact or external contamination, and confounding factors (Calafat and Needham,
33 2009; Dekant and Völkel, 2008; Markham *et al.*, 2010; Ye *et al.*, 2007). The major ones
34 are related to i) stability of BPA and BPA conjugates in the sample matrix and during
35 sample processing, ii) BPA background levels due to sample handling and work up, iii)
36 use of appropriate internal standards and analytical methods, including adequate
37 reporting of data.

38 Most biomonitoring data obtained in different biological samples available up to 2010
39 have been tabled in a FDA report (US FDA, 2010b) and recently reviewed (Geens *et al.*,
40 2012). Comparison among results from different studies is not always simple, due to
41 reporting difference. As an example, for statistical analysis non-detectable samples are
42 assigned a value which is generally, but not always the LOD value, differently determined
43 by the various authors. For this reason all data below LOD and LOQ, as well as some
44 average (median) values should be interpreted with caution.

45 From blood data, which were measured in a limited number of enrolled individuals, it
46 appeared that free and conjugated BPA levels are typically $\leq 1 \mu\text{g/L}$ (US FDA 2010b),
47 which is consistent with the known rapid plasma clearance of BPA and its metabolites and
48 kinetic studies conducted in humans. Only two studies (Schönfelder *et al.*, 2002;
49 Padmanabhan *et al.*, 2008) reported much higher free BPA levels in maternal and fetal
50 plasma as well as placenta tissue. Because they did not measure conjugates, the
51 reported levels have a limited value and should be interpreted with caution. In a recently
52 performed controlled human study at environmentally relevant BPA doses, where
53 potential technical factors as sources for BPA variability in biological tissues were
54 adequately reduced, serum concentrations of parent BPA were consistently below LOD

1 (1.3 nM) (Teeguarden *et al.*, 2011). The residual observed variability in free BPA levels,
2 approximately by a factor of 4, could be attributed to interindividual variability in BPA
3 metabolic disposition.

4 Liao and Kannan (2012) determined free and conjugated BPA (glucuronide and disulfate)
5 forms of BPA in human urine and serum samples of 32 healthy volunteers, using solid-
6 phase extraction (SPE) and liquid chromatography–tandem mass spectrometry
7 (LC–MS/MS) techniques. They found 32% and 19% of free BPA with respect to the total
8 BPA measured in urine and serum, respectively. Glucuronated BPA, the dominant
9 metabolite, was present in this form in 57% and 43% of the total BPA in urine and
10 serum, respectively.

11 The influence of functionally relevant polymorphic UGT2B15, the major UGT isoform
12 responsible for BPA metabolism, on the blood concentration time profile has been
13 recently investigated by using a validated physiologically based kinetic human model
14 (Partosch *et al.*, 2013). Maximum concentrations (C_{max}) and AUCs in blood varied for a
15 factor of 4.7 and 4.6 in high and low metabolisers (dose: 1 µg/kg/day) in accordance
16 with biomonitoring data reported by Teeguarden *et al.* (2011). The highest C_{max}-value
17 calculated in the subject with the lowest metabolic clearance is roughly 40 pg/mL, far
18 lower than the reported high blood concentrations which cannot be explained by a
19 genetically impaired UGT2B15 activity (Partosch *et al.*, 2013).

20 The largest-scale studies with a consistently high number of enrolled participants (n=
21 2517 and 5476 individuals) spread over a broad range of age, were carried out in the
22 USA and Canada, respectively (Calafat *et al.*, 2008; Bushnik *et al.*, 2010).

23 In both studies, after adjusting BPA levels for creatinine, the youngest age category (6–
24 11 years) showed the highest urinary concentrations (3.6 ng/mL in the US and 1.30
25 ng/mL in Canada), when compared to the average values of the general population (2.6
26 ng/mL and 1.16 ng/mL, respectively). Recent biomonitoring studies in Asian countries
27 gave similar results (Zhang *et al.*, 2011).

28 According to WHO (WHO, 2010), the available urinary data allow to estimate the median
29 exposures for adults and for children in the range of 0.01–0.05 µg/kg body weight (b.w.)
30 per day and 0.02–0.12 µg/kg b.w. per day, respectively. Similarly, US FDA derived mean
31 daily intake of BPA is <0.03 - 0.13 µg/kg b.w./day for a 60-kg adult, and 0.07 to 0.12
32 µg/kg b.w./day for a 36.1-kg child (age 3-14), by using FDA's standard default
33 assumptions (US FDA, 2010a). The recent evaluation of BPA exposure by EFSA (EFSA,
34 2013) indicated diet to be the main source of exposure to BPA in all population groups.
35 In the current exposure of up to 857 ng/kg b.w./day for toddlers and up to 495 ng/kg
36 b.w./day for infants of 1-5 days were estimated, while for adults (including woman of
37 childbearing age) the exposure was up to 132 ng/kg b.w./day.

38 Mose *et al.* (2012) studied in human placentas *ex vivo* the PBA transplacental transfer
39 rate. Results lead the authors to conclude that free BPA can cross the placenta by
40 passive diffusion with a transplacental transfer rate of 1 (i.e. the concentration in the
41 fetal blood was equal to the concentration in the blood of the mother), similarly to a
42 previous study (Balakrishnan *et al.*, 2010).

43 Two recent studies reported BPA concentrations (both free and conjugated forms) in
44 amniotic fluid and fetal liver samples (Edlow *et al.*, 2012; Nahar *et al.*, 2012). However,
45 the lack of procedures used to avoid contamination and deconjugation of BPA during
46 sample handling, do not allow any conclusions to be drawn from the study results.

47 The occurrence of BPA in breast milk was analysed in some small-scaled studies (Cariot
48 *et al.*, 2012; Ye *et al.*, 2006; Ye *et al.*, 2008; Otaka *et al.*, 2003; Sun *et al.*, 2004;
49 Kuruto-Niwa *et al.*, 2007; Yi *et al.*, 2010). This information can be relevant to estimate
50 exposure of breast-fed infants, as a consequence of exposure of the lactating mother.
51 The lactational transfer from the maternal plasma compartment to the maternal milk
52 compartment, both as free and conjugated BPA, has been demonstrated in rat studies
53 (Snyder *et al.*, 2000; Doerge *et al.*, 2010c), where dams were administered a daily oral

1 dose of 100 µg/kg b.w. of ¹⁴C- or deuterium-labelled BPA, respectively. The older study
2 indicated that total exposure of the lactating pups was estimated to be approximately
3 0.3% of the dose (mg/dam)/kg pup weight, with about 80% of the total BPA
4 concentration consisting of BPA-glucuronide (EFSA, 2010; Doerge et al., 2010c). The
5 more recent study reported that on day 7 postpartum at 1 h after dosing, when BPA
6 serum levels are maximal (Doerge et al., 2010a), mean concentrations of 0.2 ng/mL and
7 1.7 ng/mL for free and total BPA, respectively, with a proportion of only 13% free BPA,
8 were observed. Consequently, the concentrations in pup serum are estimated below 0.2
9 nM (45.6 pg/ml). Therefore, pup exposure via lactation is extremely low (1/300 of the
10 maternal dose).

11 BPA has also been reported in human milk. In the most recent study (Cariot et al.,
12 2012), in which appropriate measures to avoid contamination by environmental BPA
13 were taken, including milk collection (drawn manually without breast milk pumps or
14 gloves), free BPA was absent in solvent blanks. BPA was detected only at low
15 concentrations (≤0.12 ng/mL; lower than the LOQ) in some of the pooled, mature breast
16 milk samples taken from donors breast-feeding for over 1 month, used as quality-control
17 materials. In the test samples collected from additional donors (n=3) within a few days
18 after delivery, distinctly higher levels of free BPA (0.80, 3.07, and 3.29 ng/mL) were
19 detected compared to the donors breast feeding for over 1 month. The very small
20 number of samples limits the possibility of generalising the obtained results and the
21 difference in the protein/fat composition between colostrum and mature breast milk limit
22 the possibility of comparing the two groups. In addition, since no information is available
23 on possible treatment with medical devices during the hospitalization period of the three
24 mothers, a parenteral exposure to BPA cannot be excluded. This information could be
25 interesting also for the understanding of the influence of medical devices on the exposure
26 of possible groups at risk, like the infants.

27 In two studies ELISA (Kuruto-Niwa, 2007) or HPLC-FLD (Sun et al., 2004) methods were
28 used to detect total BPA in breast milk: 1.4–7.1 ng/mL; median =3.0 ng/mL in samples
29 from 101 healthy mothers in the former and 0.28–0.97 ng/mL in 23 samples in the
30 latter. However, the scarce reliability of the methods used limit the relevance of these
31 data. In two studies in the USA, free and total BPA in breast-milk samples were
32 quantified by isotope-dilution HPLC-MS/MS (Ye et al, 2006; 2008). Free BPA was
33 detected in 60% of the 20 analysed samples with a median of 0.4 ng/mL (below the
34 LOQ) and a maximum of 6.3 ng/mL (Ye et al, 2006), with free BPA being around 36% of
35 total BPA. In their later study, Ye et al. (2008) additionally analysed 4 milk samples. The
36 free and total BPA concentrations were 0.41–1.54 ng/mL and 0.73–1.62 ng/mL,
37 respectively, with free BPA in the individual samples accounting for 50–99% of the total.
38 The presence of β-glucuronidase in human milk (Gaffney et al., 1986, Grazioso and
39 Buescher, 1996) could be the cause for such a high free BPA proportion. However,
40 importantly, the glucuronide could be deconjugated in the infants' gut by intestinal β-
41 glucuronidases of bacterial origin, although not in neonates due to the scant presence of
42 intestinal flora, which usually develop starting from the 8th postnatal month.

43 Otaka et al. (2003) reported free BPA content of 0.65 and 0.70 ng/mL in 2 out of 3
44 human milk samples by using a GC-MS method, whereas in a more recent study (Yi et al,
45 2010) free and total BPA in milk samples from 100 mothers (within two weeks from
46 delivery) were detected by LC-MS/MS at values higher than 10 ng/mL.

47 On the basis of available biomonitoring and exposure data, it was recently concluded that
48 the exposure to BPA from non-food sources that by some authors was hypothesised as
49 potentially relevant sources (Calafat et al., 2009; Stahlhut et al., 2009; Taylor et al.,
50 2011) is generally lower than that from exposure from food by at least one order of
51 magnitude for most studied subgroups (Geens et al, 2012). Dietary exposure was indeed
52 estimated to contribute for more than 90% to the overall BPA-exposure for non-
53 occupationally exposed individuals (Geens et al., 2012) and exposure through dust
54 ingestion, dental surgery and dermal absorption from thermal paper accounted for less
55 than 5%. As a consequence total BPA blood concentrations should be directly related to

1 contaminated food consumption, and individuals with long fasting times before urine
2 collection should have substantially lower BPA urine levels than those with shorter fasting
3 times. The study design and sample collection are again highlighted as a crucial issue. A
4 specific case remains exposure to BPA through release from medical devices, especially
5 in some subgroups as dialysis patients and infants in Intensive Care Units.

6 However, considering the toxicokinetics profile of BPA, any significant degree of
7 bioaccumulation is not expected. If, following repeated exposure, BPA accumulation
8 occurs in slowly releasing tissues, such as fat, then BPA concentrations in urine should
9 increase with age. This is not the case in humans: individuals in the range 60-85 years
10 old show lower levels than younger people enrolled in the study of Stahlhut *et al.* (2009).

11
12 Recently, the French Agency for Food, Environmental and Occupational Health & Safety
13 (ANSES, Paris, France) published their report on the evaluation of the risk of BPA for
14 human health (ANSES, 2013). The report provides information on the aggregated
15 exposure of pregnant women and unborn children due to air, dust and food in France.
16 The median internal exposure was 1.68 ng/kg per day, whereas the maximum internal
17 exposure of all three exposure routes (95th percentile) was estimated at 4.18 ng/kg
18 per day of which 84% was due to food, 4% due to dust and 12% due to air exposure
19 (ANSES, 2013). The conversion factor used from external to internal exposure was
20 0.03 (3%). In this evaluation, ANSES excluded possible exposure to medical devices
21 including dental materials, and cosmetics. Similar to EFSA, ANSES has also concluded
22 that the diet is the main source of BPA exposure for the general population.

23
24 EFSA (2013) estimated the BPA exposure due to dietary uptake of BPA. The highest
25 exposure for children older than 6 months and up to 10 years of age was 857 ng/kg
26 b.w./day and for infants days 1-5 after birth 495 ng/kg b.w./day. For adults, the highest
27 exposure of 388 ng/kg b.w./day was estimated.

3.7.1.3. Non-oral exposure routes

30 Most studies and evaluations have focused on the potential for BPA exposure from
31 dietary sources. BPA exposure from other routes, namely through dermal and inhalation
32 routes, have received far less attention. Very few studies have estimated total BPA
33 exposure from multiple sources. Data from available studies on BPA exposure from
34 dermal and inhalation exposure routes are described below.

BPA in Cosmetics and other consumer products

37 Zhu *et al.* (2010) employed molecularly imprinted layer-coated silica nanoparticles for
38 extraction of BPA from 3 cosmetic samples followed by determination by HPLC-
39 fluorescence detection: Shampoo 1.71 nmol/g (398 ng/g); bath lotion 2.69 nmol/g (614
40 ng/g); cosmetic cream 1.46 nmol/g (333 ng/g). Cacho *et al.* (2013) determined BPA in
41 30 personal care products by extraction using ethylene glycol-silicone coated stir bars
42 followed by thermal desorption-gas chromatography-mass spectrometry. BPA was found
43 in six of the thirty analyzed samples (shower gel, hair gel, face cream, make-up remover
44 and mouthwash) at concentrations ranging from 30.9 ng/g to 88.3 ng/g. Employing GC-
45 MS in full scan mode, Dodson *et al.* (2012) determined up to 55 substances, including
46 BPA, in 298 consumer products. BPA at concentrations 1-100 µg/g was found in 15
47 samples, including a vinyl shower curtain and pillow protector, dish and laundry
48 detergent, tub and tile cleaner, soaps, lotions, shampoo, conditioner, shaving cream, nail
49 polish, and sunscreen. However, uncertainty in BPA determination in consumer products
50 performed by GC-MS in full scan mode may be very high. A large variation in BPA levels
51 found in cosmetic products in the three studies may be associated with the uncertainty of
52 measurements by three different methods. It may not be relevant to evaluate BPA
53 exposure from cosmetics at present due to a few and non-comparable data. However, in

1 exaggerated exposure estimation, EFSA (2013) concluded that the contribution for BPA
2 exposure due to cosmetics only contributes less than 3% of the total BPA exposure.
3

4 Dermal exposure

5 A common source of BPA exposure to consumers may be due to its presence in various
6 types of papers. The amount of BPA used in thermal paper in the EU is 1,700 tons (EC,
7 2008). Of 13 thermal printing papers analysed, 11 were found to contain 8–17 g BPA/kg
8 paper (Biedermann *et al.*, 2010). Vinggaard *et al.* (2000) reported BPA concentration 0.6
9 – 24 mg/ kg (mean 6.21 mg/ kg) in 9 kitchen paper towels/kitchen rolls made of 80 –
10 100% recycled paper. In toilet papers, BPA was found to be 46.1 mg/kg (Gehring, 2004).
11 Lopez-Espinosa (2007) found BPA (geometric mean 2.38 ng/g of material) in 47.50% of
12 samples of paper and cardboard investigated independent of the percentage of recycled
13 material and the composition of the paper.

14 Biedermann *et al.* (2010) found that when taking hold of a receipt consisting of thermal
15 printing paper for 5 s, roughly 1 µg BPA (0.2–6 µg) was transferred to the forefinger and
16 the middle finger if the skin was rather dry and about ten times more if these fingers
17 were wet or very greasy. Seventy-three percent of the BPA transferred to dry skin by
18 holding thermal printer paper was extractable after 2 hours. The authors speculated that
19 27% of the BPA transferred from the thermal printing paper to the finger was penetrated
20 into the skin. From these data, exposure of a person repeatedly touching thermal printer
21 paper for 8 hours/day, such as at a cash register, could reach approximately 57 µg/day.
22 Sun *et al.* (2001) reported that BPA content in commercially available samples of PVC
23 wrap film, PVC gloves and PVC hose to be 68±3.5 µg/g, 60.5±2.8 µg/g and 290.1 µg/g,
24 respectively. No data is available on BPA exposure from PVC gloves, but it cannot be
25 ruled out that small amounts of BPA may be transferred to the skin when these gloves
26 are used. BPA was reported in five types of plasticised PVC food wrapping films at 0, 43,
27 96, 98 and 483 mg/kg (Lopez-Cervantes and Paseiro-Losada, 2003). It is not known if
28 these samples, purchased in Spain, were made in the EU or were imported or if they
29 were produced before or after the December 2001 cessation date given by The European
30 Council of Vinyl Manufacturers (KEMI, 2011). No more recent survey data on testing PVC
31 for BPA could be found in the literature.

32 In the EU risk assessment report on BPA (ECB 2003), some worst-case scenarios for
33 dermal exposure of BPA were described. For epoxy-based surface coatings and
34 adhesives, the main route of exposure is dermal. Use of BPA in printing inks is
35 considered to result in negligible exposure.

36 Exposure from brush application of antifouling paint (without protective clothing), based
37 on a paint containing 40% epoxy-resin and a residual level of 10 ppm BPA in the resin,
38 will result in a dermal exposure to 29 µg BPA. The use of wood fillers without gloves will
39 result in 9 µg dermal exposure of BPA per event. Application of wood varnish without use
40 of gloves will result in 3.6 µg dermal exposure of BPA. Based on residual level of 1 ppm
41 BPA in an adhesive, dermal exposure to BPA arising from the use of adhesives was
42 calculated to be 0.014 mg per event.

43

44 Air and Dust

45 Air and dust levels of BPA serve as another potential source for human BPA exposure.
46 Staples *et al.* (1998) estimated 1000 t/year release of BPA from industrial production. Fu
47 and Kawamura (2010) found that the concentrations of BPA (1-17,400 pg/m³) ranged
48 over 4 orders of magnitude in the world with a declining trend from the continent (except
49 for the Antarctica) to remote sites. Matsumoto *et al.* (2005) found that BPA
50 concentrations in urban ambient outdoor air in Osaka during six months ranged from
51 0.02 to 1.92 ng/m³, with increasing levels from autumn to winter and decreasing levels
52 from winter to spring.

1 Wilson *et al.* (2007) found that potential sources of BPA exposure in preschool children
2 included outdoor and indoor air and house dust, as well as soil from homes and daycare
3 centers. Concentrations in indoor air from homes and daycare centers ranged from <LOD
4 to 193 and 8.99 ng/m³, respectively. Concentrations in outdoor air ranged from <LOD to
5 44.6 and 51.5 ng/m³ in homes and daycare centers, respectively. Concentrations in dust
6 ranged from <LOD to 707 and 156 ng/g in homes and daycare centers, respectively.
7 Rudel *et al.* (2003) found BPA present in 86% of house dust samples at concentrations
8 ranging from 0.2 to 17.6 µg/g. Völkel *et al.* (2008) reported median BPA concentration in
9 dust from 12 private houses in Germany to be 553 ng/g (range 117 to 1486 ng/kg).

10 Geens *et al.* (2009) found that BPA concentration in indoor dust samples from 18 Belgian
11 homes was 535-9730ng/g; and dust samples from 2 offices contained 4685 and 8380 ng
12 BPA/g dust. Geens *et al.* (2009) calculated 29 ng /d (or 0.4 ng /kg b.w./day) BPA intake
13 through dust by an adult with an average dust intake of 20 mg /d and a median BPA
14 content of 1460 ng/g. Exposure assessments, based on the different sources of BPA
15 exposure from the National Toxicology Program, gave a range of 0.043–14.7µg/kg
16 b.w./day BPA for 1.5 and 6 years-old children and between 0.008 and 1.5µg/kg b.w./day
17 for adults (US National Toxicology Program, 2008). Loganathan and Kannan (2011)
18 measured BPA in dust from 50 homes and 6 laboratories in the Eastern USA. Mean and
19 median concentrations of BPA in dust were 843 and 422 ng/g, respectively. The authors
20 calculated that the median daily intake of BPA via dust for adults and toddlers were 0.35
21 and 5.63 ng/kg b.w./day, respectively. The contribution of dust to total human intake of
22 BPA was estimated to be <1%. Thus, despite the high concentrations of BPA measured in
23 dust, this route of exposure seems to be a minor contributor to the total exposure.

24 According to EU risk assessment, BPA exposure as a result of brush application of
25 antifouling paints (containing 40% epoxy-resin and a residual level of 10 ppm BPA in the
26 resin), in a worst case scenario, resulted in inhalation exposure of 3x10⁻⁴ µg (ECB 2003).
27 For wood varnish, a value of 0.02 µg for inhalation exposure to BPA per event was
28 calculated, in a worst case scenario (ECB 2003).

29 Recently ANSES estimated that dust contributed for 4% to the total BPA exposure for
30 pregnant women (ANSES, 2013).

31 32 **3.7.2. Exposure to BPA from medical devices**

33 The major source of BPA exposure by medical devices is due to medical devices made
34 from polycarbonate (PC) and polysulfone (PSU). With regard to the possible presence of
35 BPA in medical devices made of PVC, notwithstanding the statement that the use of BPA
36 for polymerization and as a stabiliser for storage of vinyl chloride monomer was
37 discontinued in Europe from December 2001 (KEMI 2011). However, PVC as a possible
38 source of BPA exposure cannot be completely excluded because BPA-containing PVC may
39 still be used in the EU due to medical devices coming from outside of the EU because of
40 the global market for medical devices. For example BPA was reported in several consumer
41 products consisting of PVC (See above).

42 Only limited information on BPA exposure from medical devices was found in the
43 scientific literature. Elevated blood levels of BPA in dialysis patients have been reported
44 (Murakami *et al.*, 2007; Krieter *et al.*, 2009; Shintani and Hayashi, 2011). Calafat *et al.*
45 (2009) found that *total* BPA (including BPA metabolites) geometric mean urinary
46 concentration (30.3 µg/L) among prematurely born infants undergoing intensive
47 therapeutic medical interventions was about ten times higher than that among the
48 general population.

49 Dialyzers

50
51 Shintani (2001) reported average levels of BPA (n=4) of 0.2 and 0.7 ppb (ng/mL) in the
52 blood of patients exposed for 4 hours to dialyzers (PSU fibres, PC housing) sterilized by

1 autoclaving. The average concentrations in the blood of patients treated with two other
2 dialyzers (both with PSU fibre, one with PC housing and other with polystyrene-butadiene
3 copolymer housing) sterilized with gamma radiation, were below limit of detection (0.02
4 ppb or ng/mL). HPLC-MS was used for BPA detection. Samples (ca 10 mL) were collected
5 before dialysis and after 4h of dialysis treatment. Tests were also performed using saline
6 solutions (according to ISO 10993-7) to compare with migration into blood, using the
7 same dialyzer sterilized by the same procedure. BPA levels found were 0.1-0.2 ppb
8 (ng/mL) in the saline solution and 0.2 to 0.7 ppb (ng/mL) for blood. Pre-treatment BPA
9 blood levels were below the detection limit (0.02 ppb in plasma). It was not stated in the
10 publication if total or free BPA was measured and whether the blood was drawn from the
11 patient or directly from the equipment.

12 Sajiki *et al.* (2008) reported levels of BPA in plasma of 53 hemodialysis patients, before
13 and after hemodialysis, and in plasma of 5 healthy volunteers. The BPA measurements
14 were performed by 3 different methods: LC/ECD, LC/MS and ELISA. The plasma BPA
15 levels in 5 healthy persons were 0.033 ± 0.075 ng/ml (LC/ECD) or 0.284 ± 0.146 ng/mL
16 (ELISA). Plasma BPA levels in patients before and after hemodialysis were 0.284 ± 0.748
17 ng/mL and 0.642 ± 1.443 ng/mL respectively when measured by LC/ECD, or 0.505
18 ± 2.125 ng/mL and 0.197 ± 0.248 ng/mL respectively when measured by ELISA, or
19 0.310 ± 0.840 and 0.179 ± 0.263 ng/mL respectively when measured by LC/MS. Individual
20 values or range of BPA in plasma are not reported. The results of the study cannot be
21 considered reliable because the recovery of 100 ng/ml BPA in plasma or water was only
22 61-72% by LC/MS and ELISA methods and the selectivity of LC/ECD method was very
23 poor. In addition, the hemodialysis set-up used for any of the patients was not described.

24 Murakami *et al.* (2007) determined the amount of BPA leaching from dialyzers with PSU
25 membranes in the blood of 15 patients. An indication for an increase in BPA was found
26 from 4.83 ± 1.94 ng/mL blood prior to dialysis to 6.62 ± 3.09 ng/mL thereafter (increase
27 of 1.79 ng/mL); however, a later second test with the same patients and the same
28 dialyzers resulted in a much lower increase in BPA serum levels, from 3.78 ± 2.57 ng/ml
29 to 4.27 ± 2.98 (0.49 ng/ml increase). Both the quoted differences are not statistically
30 significant; in addition, BPA concentration was measured by ELISA, which may be prone
31 to cross reactivity with other phenols, leading to overestimation of BPA content.

32 Krieter *et al.* (2013) found that despite differences in BPA elution into water from 3
33 different types of dialyzers with high and low-flux polysulfone and polyethersulfone
34 membranes, the plasma levels of 18 patients with chronic kidney disease treated with
35 any of the dialyzers did not significantly change after a 4-week treatment period. On the
36 other hand, BPA pre-dialysis plasma concentrations in patients were significantly higher
37 (range $9.1 \pm 4.5 - 12.0 \pm 6.0$ ng/mL) than those found in the healthy control group ($n=$
38 $24, \leq 0.2 \pm 0.1$ ng/mL). Fractions of protein-bound and free plasma BPA were found to
39 have similar values in dialysis patients ($74 \pm 5\%$) and in the control group ($70 \pm 3\%$).
40 ELISA method was used for BPA measurements.

41

42 Dental materials

43 Recent reports from different authorities addressing the risk assessment of BPA from
44 various sources, especially food contact materials, have to some extent also addressed
45 dental materials. The general conclusion is that the contribution from dental materials to
46 the total exposure is low (Beronius and Hanberg, 2011; FAO/WHO, 2011; Environment
47 Canada/Health Canada 2008; EC 2010b; US NTP-CERHR, 2008; EFSA, 2013). A report
48 recently published by the Swedish National Board of Health and Welfare (Socialstyrelsen
49 2012) addressed "Bisphenol A in dental materials". The report summarizes research on *in*
50 *vitro* and *in vivo* studies related to BPA from dental materials, and concludes that there is
51 a possibility of low-dose exposure to BPA from dental materials, either as a contaminant
52 (very low amounts) or from degradation of Bis-DMA. In the report, calculations based on
53 the maximum values of BPA found in fissure sealants and in composite materials, in
54 combinations with the actual amount of material used in clinical practice and a median 4-
55 year life-time of a composite restoration, suggest a maximum exposure of 0.06 μ g

1 BPA/day from fissure sealants, and a maximum exposure of 0.36 µg BPA/day from
2 composite restorations.

3 Kang *et al.* (2011) assessed the changes in bisphenol A (BPA) levels in saliva and urine
4 after placing lingual bonded retainers. Liquid chromatography/mass spectrometry was
5 used to examine the BPA levels in the saliva and urine samples collected from 22
6 volunteers who received a lingual bonded retainer on their mandibular dentition. Samples
7 were collected immediately before placement and 30 minutes, 1 day, 1 week, and 1
8 month after placement. The salivary BPA level detected in the samples collected just
9 after placement with a mean concentration of 5 ng/mL and a maximum of 21 ng/mL.

10 Olea and co-workers (1996) recruited 18 healthy men and women who were treated with
11 one molar sealant, and found no composite components before treatment (except in one
12 subject who was excluded), whereas after treatment all saliva samples contained variable
13 amounts of BPA ranging from 90 to 931 µg in the total saliva produced by the volunteers,
14 who spit and collected their saliva in glass vials during the whole 60-minute period.

15 Arenholt-Bindslev and colleagues (1999) enrolled 8 adult male volunteers who were
16 treated with 4 molar sealants of 2 different brands. BPA assessment was done before,
17 immediately after, 1 hour after and 24 hours after sealant placement. Before treatment,
18 there was no detectable BPA, but after sealant placement BPA levels ranged between
19 0.3- 2.8 ppm (µg/mL). For materials containing BisDMA, the BPA was found to be
20 released immediately into the saliva after application, while at 24 hours after the
21 placement BPA levels in saliva were back to the pretreatment levels (Schmalz *et al.*,
22 1999; Arenholt-Bindslev *et al.*, 1999).

23 Fung *et al.*, (2000) recruited 40 adults and found BPA in some saliva specimens collected
24 at 1 hour and 3 hours after treatment, ranging from 5.8 to 105.6 ppb (ng/mL). In
25 addition, Joskow and co-workers (2006), using two brands of sealants, assessed saliva
26 samples in 14 patients who received a mean number of 6 sealants. Saliva samples were
27 collected pretreatment, immediately after, and 1 hour post treatment. Mean BPA before
28 treatment that was 0.30 ng/mL reached 42.8 ng/mL, immediately after placement.

29 Zimmerman-Downs (2010) enrolled 30 adults who were treated with one or four occlusal
30 sealants. BPA assessment was done 1 hour prior and 1, 3, and 24 hours post sealant
31 placement. BPA was elevated significantly from baseline measurements before sealant
32 (range 0.07 to 6.00 ng/mL) at all post-treatment time points for both groups, with main
33 peak amounts of 3.98 and 9.08 ng/mL for one-occlusal sealant group and four occlusal-
34 sealants group, respectively.

35 More recently, Han *et al.* (2012) made a survey including 62 children serving as control,
36 without restorations in the oral cavities, and 62 children treated with more than 4
37 sealants. A possible relationship was found: BPA level of control was 0.40 µg/L, whereas
38 BPA levels in saliva of treated children was 0.92 µg/L after controlling for confounders.

39 Kingman and co-workers (2012) collected saliva before and after (<1, 1-8 and 9-30
40 hours) from 172 participants receiving composite restorations. BPA concentrations in
41 saliva significantly increased within an hour after treatment from 0.43 to 0.64 ng/mL
42 (Geometric Mean), together with other restorations materials. At time periods (1-8h) or
43 (9-30h) after restoration, no differences in BPA-concentrations were found compared to
44 before treatment.

45 In summary, the release of BPA into the saliva occurs in patients receiving dental
46 restorations. Placement of resin-based composite restorations polymerised *in situ* was
47 associated with detectable increases in saliva of BPA. The release mainly occurs during
48 the few hours directly after application and contributes to the oral exposure to BPA. An
49 overview of the BPA releases, as discussed above for medical devices used in dentistry,
50 are presented in the table 2 below.

51 Recently, Kloukas *et al.* (2013) made a systematic review of *in vivo* BPA release from
52 dental pit and fissure sealants. Six interventional and two observational studies,
53 examining *in vivo* BPA release in human salivary, blood and urinary samples, were

1 included. BPA levels identified in saliva ranged from traces below the method's detection
 2 limit to 30 µg/mL. In urine, BPA quantities spanned from 0.17mg/g to 45.4mg/g. The
 3 quantitative analysis showed evidence of BPA release one hour after sealant placement
 4 compared to the amount traced before restoration (Stouffer's z trend: <0.001).

5 From the qualitative and quantitative synthesis of available studies, it is reasonable to
 6 conclude that some BPA is released after placement of dental pit and fissure sealants in
 7 the oral cavity. The largest quantities are detected in saliva immediately after or one
 8 hour after their placement.

9

10 Table 2 BPA in saliva after application of a dental sealant

11

Reference	Number/ Individuals	Time	BPA concentration	Maximum BPA reported
Kingman <i>et al.</i> , 2012	150/adult	At <1 h	0.64 ng/mL	
Han <i>et al.</i> , 2012	124/Children		0.92 ng/mL	8.305 µg/L
Zimmerman-Dawns <i>et al.</i> , 2010	30/adults	At 1 h	9.08 ng/mL	
Joskow <i>et al.</i> , 2006	14/adults	At 1 h	42.8 ng/mL	96.2 ng/ml
Sasaki <i>et al.</i> , 2005	21/adults			100 ng/ml
Fung <i>et al.</i> , 2000	40 adults	At 1 h		105.6 ppb (ng/mL)
Arenholt-Bindslev <i>et al.</i> , 1999	8 male volunteers	Immediately after		2.8 ppm (µg/mL)
Olea <i>et al.</i> , 1996	28/adults	All the saliva produced in 1 h		931 µg

12 Note to the table: The studies are listed in the chronological order (most recent first).

13

14 Only one study was identified in the category of orthodontic adhesives releasing BPA in
 15 saliva. Kang and coworkers (2011) evaluated the changes of BPA levels in saliva before
 16 and after placing a lingual bonded retainer on the mandibular dentitions of 2 volunteers.
 17 Samples were obtained immediately before placement of the retainer and 30 min, 1 week
 18 and 1 month after placement. Mean salivary levels of BPA were 5.04 ng/mL (range 0.85-
 19 20.88 ng/mL) in the immediately collected samples.

20

21 Medical procedures

22 A study by Sakurai (2002, only abstract available in English) indicates migration of BPA
 23 from cardiopulmonary bypass (CPB) circuits during open heart surgery and when using a
 24 saline priming solution. Blood samples were obtained from 6 patients who underwent
 25 open heart surgery after the CPB process was initiated and at the termination. For the

1 priming solution study, eight circuits were used and as control 3 samples were collected
2 directly from the saline in a polyethylene container. BPA levels measured in the blood
3 were $0.3 \pm 0.2 \mu\text{g/L}$, after the commencement of CBP and $0.4 \pm 0.3 \mu\text{g/L}$ when it was
4 finished. In the priming solution from the circuits, higher levels were found: 0.9 ± 1.1
5 $\mu\text{g/L}$. No BPA was detected in the control samples. BPA was considered to be leached
6 from the circuit because parts of the reservoir and of the oxygenator were made of
7 polycarbonate containing BPA.

8 Calafat *et al.* (2009) found that among prematurely born infants undergoing intensive
9 therapeutic medical interventions, the *total* BPA (including BPA metabolites) geometric
10 mean urinary concentration was $30.3 \mu\text{g/L}$ with $946 \mu\text{g/L}$ as the highest value measured
11 that was about ten times higher than that among children 6-11 years old (Calafat *et al.*,
12 2008). More than 90% of the BPA detected in the urine of the prematurely born infants
13 was in its conjugated (e.g. glucuronide, sulfate) form. The authors attributed the high
14 BPA levels to the recent treatment given to the infants after birth rather than to the *in*
15 *utero* exposure. Notably, BPA total concentrations among infants in one health care unit
16 were about 17 times higher than those among the infants hospitalized in the second one.
17 The authors suggested that this difference may be due to parenteral exposure via
18 medical devices used, which is supported for the same neonates by a strong association
19 between di(2-ethylhexyl) phthalate (DEHP) and BPA total concentrations.

20 Based on the iso-propanol extraction of BPA from PC pellets (0.2-0.3 mg/kg) and
21 assuming that 100% of this BPA would also leach from the material during clinical use
22 within a single day, the patient exposure could be estimated as high as $0.0386 \mu\text{g/kg}$
23 b.w./day, considering a body weight of 58 kg. This estimation was presented in the data
24 submitted through the Call for Information.

25 Women who had caesarean sections showed much higher levels of free and total urinary
26 BPA than women giving birth naturally, the 95th percentile being $273.9 \mu\text{g/L}$ vs. $4.2 \mu\text{g/L}$,
27 with data adjusted for creatinine levels (Vandentorren *et al.*, 2011). However, as
28 contamination with BPA from exogenous sources during sample storage can be excluded,
29 the high level of BPA was attributed to the release of BPA from the urinary catheter used
30 for collection. Indeed, supplemental studies on the release of BPA from catheterization
31 probes into urine at room temperature for 12 and 24 hours clearly indicate the time
32 dependence of free BPA extraction from the probes up to approximately $300 \mu\text{g/L}$.

33 Conclusion

34 BPA release was demonstrated from dialyzers, dental materials, circulation equipment,
35 neonatal care medical devices, and urinary catheters. Some clinical studies involving
36 hemodialysers indicated that there were no significant BPA plasma level changes after
37 dialysis treatment. However, one study reported a difference in BPA plasma levels
38 between dialysis patients and controls. The release of BPA from other medical device is
39 generally very poorly characterised in human studies.

40 Dental materials release BPA especially shortly (0-1 h) after placement, the levels of BPA
41 detected in saliva ranged from 0.64 ng/mL to $30 \mu\text{g/mL}$. This wide range in BPA
42 measurements reflects a continuous reduced leaching of BPA from dental materials,
43 probably due to the reduced use of bis-DMA.

44

45 **3.7.3. Exposure to BPA from medical devices under** 46 **different scenarios**

47

48 Scenarios in hospitals

1 Taking into account the many possible sources of exposure of patients during hospital
2 care and the scarcity of information related to release of BPA from medical devices, six
3 scenarios were considered to be representative situations.

4 (i) External contact with a medical device containing BPA;

5 (ii) Contact with oral/dental material and / or orthodontic equipment;

6 (iii) Contact with implants such as valve, pacemaker, insulin dispenser made in
7 polycarbonate;

8 (iv) Hemodialysis;

9 (v) Prolonged surgical procedures such as bypass operations and transplantations;

10 (vi) Prolonged exposure to different sources of BPA in intensive care units.

11 The specific case of health care workers using PVC gloves which may contain traces of
12 BPA (around 0.05%) was not considered even though a few cases were reported
13 describing contact dermatitis against BPA (Aalto-Korte *et al.*, 2003). The use of BPA in
14 PVC products has been discarded by European PVC manufacturers (KEMI, 2011).

15 **(i) External contact with a medical device-containing BPA.**

16 This situation occurs very frequently since many medical devices such as catheters,
17 trocars, laparoscopic and endoscopic instruments, breast pumps, prescription spectacles
18 and lenses, etc., may contain residues of BPA (see also Annex I). In this scenario
19 exposure may be repeated but, taking into account the small surface area of the medical
20 device in contact with skin or mucosa, the amount of released BPA is very low. Taking
21 the example of a disposable laryngoscope blade made of polycarbonate, the surface area
22 in contact depends on the size and the shape. Sizes range from 00 (premature) up to 3
23 (large, adult). The surface area is estimated to be in the range ca. 5 to 25 cm². For a 1
24 kg premature infant and a 60 kg adult this is $5/1 = 5$ and $25/60 = 0.4$ cm²/kg b.w. The
25 application is single use. The contact medium is mucosa, the temperature is 37°C and
26 the contact duration is a few minutes at most.

27
28 *Calculation:* For the release of BPA from polycarbonate, EFSA (2013) considered
29 tableware (plates, cups etc.) made of polycarbonate and using from the literature the
30 migration data into water, 3% acetic acid and 50% ethanol under testing conditions of 2
31 hours at 70°C. These data were combined with data from the EFSA call for data obtained
32 under the same testing conditions. An upper-bound value of 0.0013 mg/L was derived
33 from the 2h contact times. Rounding this value up to 0.002 mg/kg and assuming a
34 conservative surface area: volume ratio of 1000 cm²/L, migration of BPA from PC articles
35 equates to 2 ng/cm². Assuming (conservatively) that each contact use of a laryngoscope
36 releases the same amount (on an area-related basis) as PC for 2 hours of contact at
37 70°C, exposure from the laryngoscope would be 1 ng/kg b.w./use for premature infants
38 and 0.08 ng/kg b.w./use for adults.

39

40 **(ii) Contact with dental material and orthodontic equipment**

41 Dental materials may be divided in two scenarios

- 42 • Short-term exposure in conjunction with dental treatment: one full crown
43 restoration of a molar may release after 24 h on average 57.38 nmol (13µg)(Van
44 Landuyt, 2011)
- 45 • Long-term exposure from the use of dental materials: After 24 h, no elevation in
46 BPA-level (saliva, urine) is found (Kingman *et al.*, 2012; Kang *et al.*, 2011)

1 Additionally, there may be a possible exposure from the procedure of removing a
2 restoration. This situation is not well covered in the scientific literature and may need
3 further investigation.

4 *Calculation:* Given the considerable uncertainty with respect to the chemical composition
5 of dental materials used, both now and in the past, the value of 13 µg released in the
6 one day following treatment (Van Landuyt, 2011) is considered for short-term (acute)
7 exposure and this would be 200 ng/kg b.w./day for a 60 kg b.w. adult. The value of 0.36
8 µg/day (6 ng/kg/b.w./day) from the Swedish review is considered for the long-term
9 exposure scenario for adults undergoing composite restorations and 0.06 µg/day (2
10 ng/kg b.w./day) for a 30 kg child treated with fissure sealants.

11 For orthodontic equipment, the case of PC brackets secured using adhesives is
12 considered. Release of BPA from adhesives and PC brackets under experimental
13 conditions is presented in table 1 above.

14 *Calculation 1:* For short-term exposure, there was BPA release of 66 µg/L from a light-
15 cured adhesive resin analysed at day-7 (Sunitha *et al.*, 2011). With a typical saliva
16 production of 15 mL/kg b.w./day the short-term exposure would be 140 ng/kg b.w./day.
17

18 *Calculation 2:* For medium-term exposure, there was a BPA release of 2.9 µg/L from a
19 light-cured adhesive analysed after 30 days immersion in simulant (Eliades *et al.*, 2011).
20 With a typical saliva production of 15 mL/kg b.w./day, medium-term exposure would be
21 1.5 ng/kg b.w./day. Adding this to the daily exposure possible from the PC brackets (see
22 below) gives exposure of 13.5 and 7.5 ng/kg b.w./day for a 30 kg b.w. child and a 60 kg
23 b.w. adult, respectively.
24

25 *Calculation 3:* For long-term exposure, Watanabe *et al.* (2001) found that PC brackets
26 released BPA when immersed in water. The BPA increase in the water was 3.8-fold after
27 12 months immersion in water at 37°C, and 14-fold after 14 weeks immersion in water
28 at 60°C, when compared to virgin water values. BPA release started slow at 0.4 µg/g of
29 PC until 6 months and increased to 3.8 µg/g of PC at 12 months immersion in water at
30 37°C. With a typical weight of approximately 40 mg and a maximum number of 24
31 applications, the total weight of brackets would be ca. 1 g of PC. The release would be 10
32 ng/day or an exposure of 0.33 and 0.17 ng/kg b.w./day for a 30 kg b.w. child and a 60
33 kg b.w. adult, respectively. In this long-term scenario, it is assumed that any release of
34 BPA from the adhesive used to secure the brackets has declined to a not detectable level.
35

36 **(iii) Contact with an implant**

37 According to the implanted device such as a valve, pacemaker or a dispenser made in
38 polycarbonate, the surface in contact with tissues and body fluids may be estimated
39 (worst case scenario) to be 50 cm². EFSA (2013) considered the migration from PC baby
40 bottle into food simulants and they derived an average migration of 0.89 µg/L and a high
41 migration of 4.56 µg/L. The most usual test conditions employed with food simulants
42 was 10 days contact at 40°C. Rounding-up, taking the high migration of 0.5 µg/L per
43 day, and the conservative area volume ratio (see above) of 1000 cm²/L, then a release
44 value of 0.5 ng/cm²/day can be derived.

45 *Calculation 1:* 50 cm² releasing 0.5 ng/cm²/day would give exposure of 25 ng per day,
46 this being 0.4 ng/kg b.w./day for a 60 kg b.w. adult or 0.8 ng/kg b.w./day for a 30 kg
47 b.w. child. This release rate includes the possibility of hydrolysis of the PC surface rather
48 than only classical diffusion-migration.

49 *Calculation 2:* Mass of 10 g PC in the medical device and with up to 10 mg/kg residual
50 BPA gives a residual content of 100 µg. If 10% were released in the first 30 days of use
51 of the implant (highly unlikely) this would give 333 ng/day or 6 and 11 ng/kg b.w./day

1 for a 60 kg adult or 30 kg child respectively. This calculation assumes that the PC does
2 not hydrolyse *in situ*.

3 **(iv) Haemodialysis**

4 Patients experiencing renal failure need, before eventual kidney transplantation, regular
5 blood separation performed by exchange between blood and osmolar dialysis fluid
6 through a dialyser comprising a membrane and a support unit. The carter is often made
7 by polycarbonate and hold PSU membranes (often hollow filters) which may release BPA
8 as explained in the paragraphs 3.6.2 and 3.7.2.

9 The highest values of release of BPA by such dialysers, as found in the literature, are
10 comprised between 2 µg/module (Haishima *et al.*, 2001) and 4 µg/session (Fink, 2008).
11 According to their medical problems, weight, age and activity, the patients undergo 3 to
12 6 dialysis sessions each week (mean duration 3-4 hours) for the most active patients
13 (>70kg + sport practice), down to 2 sessions a week for the aged inactive and < 50kg
14 patients.

15 *Calculation:* In the worst care scenario, 4 µg of BPA per session, 6 times a week, for a 60
16 kg b.w. adult the exposure would be 57 ng/kg b.w./day.

17 **(v) Prolonged surgical procedures**

18 In this case of extracorporeal circulation (by-pass) or transplantation / implantation of an
19 artificial organ such as heart, according to the size and the nature of catheters and
20 artificial organ, the release of BPA may be estimated in the same range as in the care of
21 hemodialysis. For infants and children, although the use of medical devices may be
22 scaled-down, it is assumed that there is the same release of BPA but with a smaller body
23 weight. Consequently the short-term exposure would be 685, 114, and 57 ng/kg/b.w. for
24 an infant, child and adult of 5, 30 and 60 kg body weight respectively.

25 **(vi) Prolonged exposure to different sources of BPA in intensive care units**

26 a) in adults intensive care units

27 Adult patients hospitalized in intensive care units (ICU) are treated with the use of:

- 28 • Venous or arterial catheters (inserted by peripheral way, PICC line), with a
29 classical duration comprised between 2-3 weeks to some months onco-
30 hematology (Kabsy *et al.*, 2010)
- 31 • Respiratory assistance using tubing (some hundred grams)

33 b) in neonatal intensive care units

34 The neonates' BPA exposure can be via the respiratory tract (incubator walls and
35 respiratory tubing), the blood (catheters) and via the oral route (tubing, mother's milk
36 collected via breast pump in polycarbonate).

37 Neonates hospitalized in intensive care units (NICU) are treated with the same medical
38 devices as adults, often for several months, like:

- 39 • Venous or arterial catheters
- 40 • Respiratory assistance
- 41 • Incubator (the walls are made in polycarbonate)

42
43 For an incubator hood of dimensions 80 x 60 x 70 cm (W x D x H), the surface area of
44 polycarbonate is 24400 cm². In fact these dimensions are not used in the calculations,
45 just the vapour pressure.

1
2 *Calculation 1:* "In hoods of neonatal incubators and neonatal intensive care units, BPA
3 could not be detected (LOD approximately 50 µg/m³)" (see paragraph 3.6.2, data
4 submitted via the call for information).

5
6 Breathing volume of a prematurely born infant ca. 100 mL/kg/min gives 0.144 m³/kg
7 b.w./day. If the air contained BPA at the detection limit and assuming complete uptake
8 out of the air, the exposure would be ≤7 µg BPA/kg b.w./day. Due to the high detection
9 limit, this calculation is likely to be unrealistic; therefore, a second calculation was
10 performed.

11
12 *Calculation 2:* The vapour pressure of BPA is 5.3 x 10⁻⁶ Pa at 25°C. Assuming gas
13 ideality, since 1 mole of a gas occupies 25 L at STP at this vapour pressure, then 25L of
14 air above pure BPA solid would contain 5.3 x 10⁻¹¹ moles or 1.2 x 10⁻⁸ g of BPA.
15 Correspondingly, one m³ would contain 4.8 x 10⁻⁷ g. Residual BPA in PC is up to 10
16 mg/kg or a 10⁻⁵ mass fraction. Assuming for simplicity a linear concentration-vapour
17 pressure relationship, BPA in air at equilibrium with PC would be ca. 4.8 x 10⁻¹² g/m³.
18 Exposure = 7x10⁻¹³ g/kg b.w./day (but higher at 37°C). Although this simple calculation
19 uses many assumptions and is subject to considerable uncertainty, it illustrates that the
20 result of calculation 1 is likely to be an over-estimate by several orders of magnitude.

21
22 NOTE. For the vapour pressure of BPA various numbers were reported 1.6 x 10⁻⁹ hPa at
23 20°C, 4.12x10⁻⁹ hPa at 25°C, and 3.91x10⁻⁷ mm Hg at 25°C. ANSES and EFSA indicate a
24 value of 5.3x10⁻⁶ Pa at 25°C (ANSES, 2013; EFSA, 2013).

25
26 *Calculation 3:* Calafat *et al.* (2009) found that *total* BPA (including BPA metabolites)
27 geometric mean urinary concentration (30.3 µg/L) among prematurely born infants
28 undergoing intensive therapeutic medical interventions was about ten times higher than
29 that among the general population. The medical care given is not itemised and may or
30 may not include PC incubators along with other medical devices. Fluid intake for
31 prematurely born infants is unlikely to exceed ca. 150 mL/kg b.w./day. Insensible water
32 loss in a heated incubator can be 0.6 - 0.7 mL/kg b.w./hr for a larger prematurely born
33 infant up to 2-3 mL/kg b.w./hr for a very immature infant with immature skin and a large
34 exposed skin area (Kliegman *et al.*, 2011). Taking urine output as fluid input (150) minus
35 insensible loss (2 x 24) gives ca. 100 mL urine/kg b.w./day. So a concentration of 30.3
36 µg/L urine would equate to approximately 3 µg/kg b.w./day.

37 38 **(vii) Breast pump and collection vessel made of PC**

39
40 *Calculation:* Analogy is made here with migration levels from PC baby bottles. EFSA
41 (2013) considered the migration from PC baby bottle into food simulants and they
42 derived an average migration of 0.89 µg/L and a high migration of 4.56 µg/L. Taking the
43 average migration value along with a high level of consumption of milk by infants of 150
44 g/kg b.w./day (EFSA, 2011) would give exposure of 134 ng/kg b.w./day.

45 46 **3.7.4. BPA exposure from uses of BPA containing PVC**

47 Since no information on BPA release from PVC-made medical devices is available to
48 evaluate the possible exposure to BPA originating from PVC, a parallel was drawn and
49 information was used from the evaluation of exposure to DEHP from medical devices
50 made of PVC, performed by SCENIHR (SCENIHR, 2008).

51 Plasticised PVC is used in certain parts of medical devices for procedures such as blood
52 transfusion, haemodialysis, parenteral nutrition or endotracheal tubing. Di(2-ethylhexyl)
53 phthalate (DEHP) is the main plasticiser used in PVC-based medical devices. The typical
54 concentration of DEHP in plasticized PVC is 30% (ECB, 2004).

1 The five DEHP-plasticised PVC food wrapping films tested by Lopez-Cervantes and
 2 Paseiro-Losada (2003), contained BPA at 0, 43, 96, 98 and 483 mg/kg. The samples of
 3 plasticised PVC wrapping film, gloves and hose analysed by Sun *et al.* (2001) contained
 4 BPA at 68, 61 and 290 mg/kg respectively. From these 8 results, a crude average of
 5 approximately 150 mg BPA /kg PVC was derived.

6 Comparing the two concentrations, with DEHP at approximately 300,000 mg/kg (i.e.
 7 30% by weight) and BPA at ca. 150 mg/kg, the concentration ratio is 2000:1. The
 8 estimation of exposure is based on the assumption that DEHP and BPA leach from
 9 plasticised PVC used in medical device, in this same ratio of 2000:1.

10 For adults, the SCENIHR 2008 opinion used data based on measurements of DEHP blood
 11 levels in patients before and after specific medical procedures and concluded that blood
 12 transfusions to trauma patients or during ECMO (extracorporeal membrane oxygenation)
 13 may be the short-term procedures that result in the highest acute DEHP exposure in
 14 adults, up to 10 mg/kg/day. Long-term haemodialysis was the continuously repeated
 15 procedure which may result in the highest cumulative dose of DEHP and this could be up
 16 to 2.2 mg/kg/day.

17
 18 For neonates, the SCENIHR concluded that the highest short-term exposure may occur
 19 due to double volume exchange transfusion (up to 23 mg/kg/day) while ECMO is the
 20 medical treatment which may give the highest daily exposure over a prolonged period of
 21 time, at up to 14 mg/kg/day. Similarly, SCENIHR noted that the US-FDA (2002) had
 22 estimated an upper-bound daily DEHP dose to be around 3 mg/kg/day for a newborn in
 23 the neonate intensive care unit setting, considering exposure from multiple devices. Such
 24 exposures may occur for a period of weeks or even months (SCENIHR, 2008).

25 The estimates of possible exposure to BPA from plasticised PVC medical devices that are
 26 calculated by a 2000-fold down-scaling of these SCENIHR estimates for DEHP are shown
 27 in Table 3.

28 Table 3. Derivation of estimates of possible exposure to BPA from medical devices made
 29 of plasticised PVC.

30

	Adults short-term	Adults longer-term	Neonates short-term	Neonates longer term
DEHP estimate, µg/kg b.w./day ^a	10,000	2,200	23,000	14,000
BPA estimate, µg/kg b.w./day ^b	5	1	12	7

31

32 a) SCENIHR (2008).

33 b) Taking the estimates for DEHP and reducing by a factor of 2000 to account for the
 34 ratio of the concentrations of DEHP and BPA possible in plasticised PVC (300,000 and 150
 35 mg/kg respectively, see text)

36

37 As stated, these estimates in Table 3 are based on the assumption that all the PVC used
 38 in the medical devices contain BPA and that the leaching propensity of BPA and DEHP
 39 from plasticised PVC are about the same. Considering the two molecules, BPA has a
 40 lower molecular weight than DEHP (228 versus 390 Daltons), but perhaps more
 41 significantly, BPA is only moderately lipophilic whereas DEHP is strongly lipophilic (log
 42 octanol-water partition coefficients of 3.3-3.5 versus 7.5). The exposure scenarios are for
 43 leaching into blood which, although largely aqueous, does have an important lipid

1 fraction too. Therefore, in the absence of experimental data, this assumption on relative
 2 leaching rates is reasonable.

3 Considering the case of non-plasticised PVC, if BPA were to be present in the plastic, it is
 4 assumed that rigid PVC has only minimal uses in medical devices and also that leaching
 5 rates from the plastic would be much lower than from plasticised PVC. Thus, this
 6 potential source of exposure is not being considered further.

7

8 **3.7.5. Conclusions**

9 Table 4 summarises the outcome of the different exposure scenario calculations. There
 10 is considerable uncertainty with respect to the chemical composition of medical devices
 11 and their release properties with respect to BPA. For each scenario considered, there are
 12 relatively few studies reported and in most cases the studies do not have much
 13 information on how the material under study is representative of the European situation.
 14 For these reasons the estimates of exposure have made conservative assumptions and
 15 extrapolations. Nevertheless, these figures should be viewed and used with some caution
 16 since they could underestimate or overestimate the true exposure of some patients.

17 Some of the estimated BPA exposures due to medical devices are in the same range as
 18 exposure via the food (EFSA 2013). EFSA estimated the exposure to be highest for
 19 infants and toddlers among the population older than 6 months, with the highest
 20 estimated average of 375 ng/kg b.w./day and a high dietary exposure of 857 ng/kg
 21 b.w./day. The modeled dietary exposure for teenagers, adults and elderly ranged from
 22 116 to 159 ng/kg b.w./day for average exposure, with a high exposure ranging from 341
 23 to 388 ng/kg b.w./day.

24

25 Table 4. BPA exposure from medical devices as estimated for various use scenarios.

Exposure scenario	BPA exposure estimation in ng/kg b.w./day			
	Prematurely born infant	infant	child	adult
External contact with a medical device containing BPA (short-term)	1			0.08
Contact with dental material (short-term)	na	na		200
(long-term)	na	na	2	6
Contact with orthodontic equipment (short-term)			140	140
(medium-term)			13.5	7.5
(long-term)			12	6
Contact with an implant (medium-term)			11	6
(long-term)			0.8	0.4
Hemodialysis (long-term)				57
Prolonged surgical procedures				

(short-term)		685	114	57
Prolonged exposure to different sources of BPA in intensive care units (medium-term)	3000			
Breast pump and collection vessel made of PC (medium-term)		134		
Uses of PVC (short-term)	12000 ^a			5000 ^a
(long-term)	7000 ^a			1000 ^a

a) In the absence of data on BPA, leaching properties of DEHP have been considered for the estimation.

3.8. Toxicokinetics of bisphenol A

3.8.1. BPA biotransformation

The major BPA metabolite in human is BPA-glucuronide, which is quantified in plasma and rapidly excreted in the urine; BPA-sulphate has also been detected after oral exposure as a minor urinary metabolite (Hanioka *et al.*, 2008; Kim *et al.*, 2003; Ye *et al.*, 2005). In both monkeys and rats, BPA is biotransformed by the same reactions (EFSA, 2010): the predominant pathway is glucuronidation, with the sulfation reaction representing <20% for monkeys and <5% for rat.

The efficiency of the first pass is demonstrated by the very small amounts of unchanged parent BPA, up to 9.5% of the oral administered dose is recovered in human urine (Dekant and Völkel, 2008; Völkel *et al.*, 2008; Ye *et al.*, 2005), whereas a high % of the total amount was detected as PBA-conjugates. This is especially relevant for risk assessment, since the conjugates do not retain the biological activity of the parent BPA which is the toxicologically relevant compound (Snyder *et al.*, 2000; Shimizu *et al.*, 2002, Willhite *et al.*, 2008).

From *in vitro* data, Kurebayashi *et al.* (2010) calculated that 91% of the hepatic clearance is due to glucuronidation and 9% due to sulfation in human hepatocytes; a similar percentage was observed also for clearance in monkey and rat hepatocytes. *In vivo* a variable ratio between the two reactions was determined: indeed, glucuronides account for 80-100% and sulfates for 0-15% of the oral BPA dose measured in urine of human volunteers and in individuals unintentionally exposed to BPA (Völkel *et al.*, 2002; Ye *et al.*, 2005). According to a study in a Korean population, the ratio glucuronidation/sulfation is higher in men than in women (4 vs 1.5, respectively) (Kim *et al.*, 2003). The glucuronide/sulphate ratio was not age-dependent in either species (Doerge *et al.*, 2010b).

Sulfation of BPA is mediated by sulfotransferases (SULT); SULT1A1, which is involved in the conjugation reaction of other phenols (Campbell *et al.*, 1987), has been identified as the major isoform mediating BPA sulfation in the human liver, although recombinant SULT2A1 and 1E1 showed also some activity (Nishiyama *et al.*, 2002). Among some recombinant human (UDP)-glucuronosyltransferase isoforms, UGT2B15 showed the highest activity over the range of BPA concentrations (1-20 µM) tested (Hanioka *et al.*, 2008). Other authors, by using a complementary panel of recombinant enzymes, identified a relevant role for UGT1A9 (which is expressed both in the liver and in the gastrointestinal tract) (Doerge *et al.*, 2010b) and for UGT2B7 (Mazur *et al.*, 2010).

1 It has been suggested that hepatic metabolism plays a more relevant role in humans
2 than the intestinal one, as confirmed by recent studies carried out with human
3 microsomes pooled from different donors and from different organs (intestine, kidney,
4 liver, and lung), reporting that the tissue intrinsic clearances for the kidney and intestine
5 were less than 1% of liver intrinsic clearance, whereas human lung microsomes did not
6 show glucuronidation activity towards BPA (Mazur *et al*, 2010; Trdan Luštin *et al*, 2012).
7 In order to evaluate the possible impact of the polymorphic allelic variants genetic
8 polymorphism in BPA conjugation, UGT2B15 variants and the *28 polymorphism in the
9 UGT1A1 gene were studied *in vitro* (Hanioka *et al*, 2011; Trdan Luštin *et al*, 2012).
10 Among the six recombinant UGT2B15 allelic variants no significant difference in the Km
11 value between wild-type and any variant UGT2B15 variant was evidenced; on the
12 contrary UGT2B15 variants having D85Y substitution showed markedly reduced Vmax
13 and intrinsic clearance (around 10% of the wild type enzyme) (Hanioka *et al*, 2011).
14 When human liver microsomes genotyped for UGT1A1*28 polymorphisms were tested,
15 wild-type homozygotes and heterozygotes did not significantly differ, while polymorphic
16 homozygotes significantly differed from both, showing 25% residual activity. The lower
17 catalytic efficiency for glucuronidation is due to decreases in Vmax with negligible
18 changes in Km, consistently with the lower expression of UGT1A1 in microsomes with a
19 *28 promoter polymorphism.

20 However, due to the redundancy in UGTs for conjugation, the possible compensatory
21 activity of SULT enzymes and the overlapping substrate specificity, it is expected that a
22 single polymorphism would not significantly affect the total BPA glucuronidation capacity
23 of individuals (EFSA, 2010). To support this conclusion, a recent study using a human
24 based PBPK modelling estimated a factor of 4.7 for the maximum blood concentration
25 (Cmax) and of 4.6 for the Area Under the Curve (AUC) between human hepatic cells from
26 15 different donors showing low and high intrinsic clearance for BPA (Partosch *et al*,
27 2013).

28 In addition, starting from data on UGT variants by Hanioka *et al*. (2011) for an oral dose
29 of 1 µg/kg/day, the Cmax for the UGT2B15.2 and the UGT2B15.5 variant was 3.9-fold
30 and 4.9-fold higher than that of the wild-type, respectively with AUC values 4.9 and 5.5-
31 fold higher with respect to the wild type (Partosch *et al.*, 2013).

32 The glucuronidation and the sulfate pathways are negatively correlated: by using a PBPK
33 model it has been evidenced that in subjects with low glucuronidation capacity the
34 fraction of dose which is metabolized to the sulfate conjugate is higher than in subjects
35 with high glucuronidation capacity (Partosch *et al.*, 2013).

36 This limited level of variability is further confirmed by the results of a recently performed
37 biomonitoring study showing variability in BPA levels in human tissue approximately by a
38 factor of 4, attributed to inter-individual variability in BPA metabolic disposition
39 (Teeguarden *et al.*, 2011).

40 Therefore, it can be considered that the default value of 10 used to account for kinetic
41 interindividual variability within the general population (IPCS, 2005) can cover
42 differences due to polymorphically expressed enzyme activity involved in BPA
43 metabolism.

44 More recently additional metabolic pathways have been reported in *in vitro* studies, but
45 their relevance *in vivo* has not been demonstrated to date.

46 Rat liver microsomes and recombinant human CYPs have been shown to biotransform
47 BPA into hydroquinone via an ipso-substitution reaction and isopropenylphenol and
48 hydroxycumyl alcohol (HCA) were also produced as further metabolites (due to a C-C
49 bond scission). Formation of novel metabolites via ipso-substitution pathway was about
50 20% of o-OH-BPA formation, via traditional oxidative pathway of P450 (Nakamura *et al*,
51 2011). Among the panel of 12 recombinant CYP tested, only CYP3A4 and 3A5 catalysed
52 the ipso-substitution of BPA, whereas the hydroxylation of aromatic or hydrocarbon of
53 BPA is catalysed by CYPs of the 2C family (CYP2C18> CYP2C19> CYP2C9) (Niwa *et al.*,

1 2001). Interestingly, HCA had higher ER-binding activity than BPA; for this reason, this
2 metabolic pathway has been claimed to play a role in the estrogenic activity of BPA.

3 The formation of another active BPA metabolite, namely 4-methyl-2,4-bis(4-hydroxyl-
4 phenyl) pent-1-ene (MBP), was demonstrated in incubation with rat liver S9 fraction in
5 the presence of a NADPH-generating system (Yoshihara *et al.*, 2001, 2004). MBP showed
6 estrogenic activity several fold higher than BPA in the yeast estrogen screening (YES)
7 and in rat *in vivo* uterotrophic assay (Okuda *et al.*, 2010). MBP is formed by
8 recombination of the radical fragment of BPA, which is the one-electron oxidation product
9 of carbon-phenyl bond cleavage, and its formation required both microsomal and
10 cytosolic fractions (Okuda *et al.*, 2011). Anti-CYP3A2 and anti-CYP2C11 antibodies
11 strongly inhibited the formation of MBP, suggesting the involvement of these two
12 isoforms in generating dimer-type metabolite, whereas the exact function of cytosol is
13 still unclear. Similar metabolic activation was demonstrated also for various other BPA-
14 related compounds, including BPB and BPF (Okuda *et al.*, 2011).

15 However, these *in vitro* studies have been carried out with recombinant enzymes or
16 subcellular fractions in experimental conditions avoiding any competition with the
17 predominant and more efficient metabolic pathways, involving direct conjugation of the
18 parent compound. The relative importance of these reactions in actual *in vivo* conditions,
19 when the other pathways are simultaneously active, is not known, although it is expected
20 to be relevant under circumstances where glucuronidation is unable to work efficiently as
21 a detoxification pathway of BPA.

22

23 **3.8.2. Toxicokinetics after oral uptake**

24 In humans, BPA is readily and almost completely absorbed by the oral route, as
25 demonstrated by the high recovery in the urine of human volunteers (97% and 84% of
26 the ingested dose in males and females, respectively) (Völkel *et al.*, 2002, 2005). Since
27 human volunteers were dosed with deuterated BPA, it was possible to differentiate
28 between administered BPA and BPA coming from other sources. Results were consistent
29 with studies carried out dosing nonhuman primates (Doerge *et al.*, 2010a and b) and
30 with some modeled data (Mielke and Gundert-Remy, 2009). Comments on these data
31 (Vandenberg *et al.*, 2010a, 2010b) were evaluated concluding that these comments were
32 not scientifically justified (Hengstler *et al.*, 2011).

33 In humans, both low and high single oral doses of BPA are well absorbed (>90%). This is
34 a conservative estimate for neonates, since the immature pancreatic and biliary secretion
35 and the scant presence of intestinal flora up to the 8th month can limit the absorption of
36 BPA in infants (Ginsberg *et al.*, 2002). Because of high first-pass metabolism in the liver,
37 the systemic availability of free BPA is low and varies between species. As a
38 consequence, the half-life is very short, ranging from 1 to 3.5 hours (Völkel *et al.*, 2002,
39 2008; Tsukioka *et al.*, 2004; Shin *et al.*, 2004), as estimated by considering the
40 excretion data and assuming that the rate-limiting step is BPA detoxication.

41 Oral doses of labelled BPA (methyl-d6-BPA, 100 µg /kg b.w.) given to adult non human
42 primates are nearly completely absorbed, with very low (<1 nM) serum levels of free BPA
43 (Doerge *et al.*, 2010b), indicating a very limited systemic availability of the parent
44 compound and a concentration–time profile for total BPA similar to that of human
45 volunteers administered a dose of 50–90 µg/kg b.w. BPA (Völkel *et al.*, 2002). The
46 estimated half-life of 3.5 hours for total BPA in rhesus monkey (Doerge *et al.*, 2010b)
47 was similar to those reported in cynomologous monkeys (4.2h; Tominaga *et al.*, 2006),
48 and humans (3.4h, Völkel *et al.*, 2002). Similar agreement was found for other
49 pharmacokinetic parameters obtained in non human primates (Kurebayashi *et al.*, 2002;
50 Tominaga *et al.*, 2006; Taylor *et al.*, 2011; Tharp *et al.*, 2012; Patterson *et al.*, 2013).
51 The comparison of results obtained after oral dosing and *i.v.* injection, expressed as the
52 ratio $AUC_{oral}/AUC_{i.v.}$ indicated also the relevance of the first-pass effect, supporting the
53 conclusion that presystemic conjugation mainly occurring in the liver after oral

1 administration is a crucial factor in determining the internal dose of free BPA after oral
2 administration.

3 A marked species difference exists in BPA disposition when data obtained in human and
4 monkeys are compared to rodents, where BPA undergoes enterohepatic recirculation
5 (Kurebayashi *et al.*, 2003; Upmeier *et al.*, 2000; Pottenger *et al.*, 2000). After an oral
6 dose BPA is readily and completely absorbed also in rats, metabolized in the liver with a
7 high degree of conjugation similar in the three species (>99%): the comparison with
8 data on free BPA in serum obtained after oral dosing and i.v. injection led to the
9 conclusion that a high first-pass effect take place also in rats, and indeed, the total
10 hepatic clearance for BPA conjugation as measured *in vitro* with cryopreserved
11 hepatocytes is higher in rats than in monkey and human cells (Kurebayashi *et al.*, 2010).
12 Then, at variance with human and monkeys, BPA metabolites in rats are excreted from
13 the liver via the bile into the gastrointestinal tract, and not in the urine. The BPA
14 conjugates are cleaved back to BPA and the free BPA is reabsorbed (enterohepatic
15 recirculation). As a result, BPA clearance takes longer in rats than in humans, the half-life
16 in rodents being 19-78 hours (EFSA, 2006). The occurrence of a high metabolic turnover
17 and the occurrence of the enterohepatic recirculation was also demonstrated by a recent
18 study using stable isotope-labeled BPA, showing a second peak in the concentration of
19 total BPA in the plasma concentration-time profiles (Doerge *et al.*, 2010a): this second
20 peak was totally absent in primates kinetics.

21 As in rats, the plasma concentration-time profiles after an oral dose of BPA to female
22 CD-1 mice exhibited a second peak in the concentration of total BPA, indicating the
23 presence of the enterohepatic recirculation (Taylor *et al.*, 2011), although the half-life
24 (~4 hours) was lower than the one exhibited by the rats. The efficiency of the pre-
25 systemic conjugation reaction was very high, with only ~1% of the administered dose
26 was found as free BPA 30 minutes after dosing.

27 The availability of studies on mice, rats and monkeys with a common study design (same
28 dose and vehicle, analytical methodology, model-independent pharmacokinetic analysis,
29 age ranges), allowed reliable interspecies comparisons. Internal exposures to free BPA
30 following oral administration are similarly low ($C_{max} < 10$ pM per g/kg b.w.) for adults of
31 all three species, again supporting the dominant role of presystemic Phase II
32 metabolism. Although there are major differences in BPA metabolism and disposition
33 between rodents (enterohepatic recirculation and extensive fecal excretion of
34 unconjugated BPA) and primates (extensive urinary excretion of conjugated BPA) that
35 directly affects BPA half-life, which, again, is longer in rats than in primates. Based on
36 the analysis of oral versus intravenous toxicokinetic data (Doerge *et al.*, 2010a, 2010b;
37 2011; 2012), the oral systemic bioavailability of unconjugated BPA is 2.8%, 0.2% and
38 0.9 % in rats, mice and monkeys, respectively. Gayrard *et al.* (2013) also reported that
39 the absolute bioavailability for unconjugated BPA in blood was below 1% after orogastric
40 dosing in dogs. The systemic availability of unconjugated BPA in humans has not been
41 evaluated experimentally, however, modelled data and controlled biomonitoring studies
42 indicated that internal exposure in humans to unconjugated BPA is very low (1-10%)
43 (Mielke and Gundert-Remy, 2012; ANSES, 2013).

44 The comparison of BPA kinetics in adult vs. neonatal animals in the three species was
45 also performed, highlighting another major interspecies difference related to neonatal
46 development in the Phase II metabolism of BPA.

47 Oral administration of the same BPA dose (100 μ g/kg b.w.) to PND3 (Post Natal Day 3)
48 in rat pups produced higher C_{max} in serum of total and free BPA (6- and 74-fold,
49 respectively) when compared to adults. The fraction present as conjugates increased with
50 age time (93.4, 96.9 and 98.9% at PND 3, 10 and 21, respectively), indicating a
51 progressive development of metabolic and excretory functions toward the adult situation
52 (when 99.5% BPA is in conjugated form). Similar results supporting the presence of first-
53 pass metabolism, albeit at levels markedly lower than in the adult rat, were reported in
54 neonatal rats following oral delivery of 10 μ g BPA/kg b.w. (Prins *et al.*, 2011): free BPA
55 constituted 29%, 21% and 31% of total BPA levels at 0.5, 1 and 2 h, respectively. The

1 relative deficiency in Phase II metabolism in newborn versus adults is even more
2 pronounced in the mouse (Doerge *et al.*, 2011b). The similarity in the toxicokinetics in
3 newborn mice following subcutaneous (s.c.) or oral administration (AUC ratio = 1.0)
4 appeared to be mice-specific and was explained by the metabolic immaturity, rapid oral
5 absorption, and rapid distribution of unconjugated BPA (Doerge *et al.*, 2011b). With
6 advancing postnatal age, due to the increasing maturation of metabolic and elimination
7 processes, the typical differences in toxicokinetics between the parenteral and the oral
8 routes were evidenced similarly to the rat. The C_{max} and AUC 0–∞ values for
9 unconjugated BPA in PND 3 pups were 189- and 260-fold greater than in adults,
10 respectively (Doerge *et al.*, 2011b). However, at PND3, the internal exposure metrics
11 (C_{max} and AUC) following oral administration are similar for rats and mice, within a
12 factor of 2.

13 The pharmacokinetics of BPA in neonatal non-human primates are clearly different from
14 neonatal rodents mainly because the degree of conjugation was not affected by
15 developmental age and consequently there was no significant age related change in
16 internal exposure metrics for free BPA in non-human primates.

17 The glucuronide/sulfate ratio was not significantly affected by age from early perinatal
18 period to adulthood in the three species.

19 The comparison of age-related BPA kinetics evidenced that newborn rodents have
20 approximately 10 times higher plasma levels of free BPA than PND5 monkeys, when
21 treated with the same oral BPA dose (Doerge, 2010a and b; Doerge *et al.*, 2011a). These
22 data provide evidence for a different developmental profile of hepatic and intestinal
23 conjugation of BPA in rodents and monkeys, consistent with literature data describing a
24 higher degree of immaturity of rats at birth as compared to primates, in relation to UGT
25 activity (Coughtrie *et al.*, 1988; Matsumoto *et al.*, 2002).

26 Many of the human UGT1A and 2B isoforms catalyzing BPA glucuronidation are
27 homologous with those in monkeys and share the same tissue distribution and substrate
28 specificity towards steroid hormones (Doerge *et al.*, 2010b). For SULT enzymes, no age-
29 dependency has been described (Pacifi *et al.*, 1993; Duanmu *et al.*, 2006) and
30 consequently, in humans the sulfation activity is comparable at birth and in the adult.
31 These considerations are supported by the results from the study of Calafat (Calafat *et al.*,
32 2009), showing that >90% of the BPA excreted in the urine by prematurely born
33 infants was in its conjugated (e.g. glucuronide, sulfate) form, clearly indicating that
34 prematurely born infants are able to metabolize BPA. In addition, the concentrations of
35 free and total BPA were linear over the range of detected BPA levels, suggesting that the
36 enzyme(s) responsible for the conjugation of BPA were not saturated in the tested
37 prematurely born infants. More recently, Nachman *et al.* (2013) measured the content of
38 unconjugated and BPA-glucuronide in the urine of 11 healthy neonates plus 1 young
39 infant, all but one receiving infant formula. The average concentration of BPA
40 glucuronide, as measured in all of the duplicate urine samples, was 0.87± 0.51 ng/mL
41 (median: 0.66 ng/ml). Unconjugated BPA was not found in any of the urine samples,
42 further demonstrating that neonates and infants are capable of conjugating BPA to the
43 BPA-glucuronide.

44 The large inter-species differences in internal free BPA dosimetry emphasize the
45 importance of using physiologically based pharmacokinetic (PBPK) modelling to estimate
46 internal exposure in adults, children and infants following different exposure scenarios.
47 The input of enzyme kinetics parameters obtained *in vitro* with human samples in the
48 PBPK models could be an important improvement in BPA risk assessments.

49 Although dietary BPA exposure would be a more appropriate and convenient route than
50 bolus exposure, most of the studies have been carried out to date with oral
51 administration of single or repeated bolus dose. Even when animals were fed a diet
52 containing BPA (Dolinoy *et al.*, 2007; Cox *et al.*, 2010) serum, concentrations of BPA
53 were not measured and it remains controversial whether the quantities of BPA supplied
54 to mice are representative of actual exposure conditions. Only one study (Sieli *et al.*,

1 2011) measured serum concentrations of isotopically tagged dimethyl-d6-BPA and its
2 conjugates resulting from dietary exposure in female mice and compared concentrations
3 with those in mice exposed through single oral bolus exposure, as in previous studies
4 (Doerge *et al.*, 2010a, 2010b; Taylor *et al.*, 2011).

5 For mice receiving the oral bolus (20 mg/kg b.w.), maximum concentration (C_{max}) of
6 unconjugated BPA-d6 (21.0 ± 3.9 ng/mL, mean ± SE) occurred within 1 hour after
7 treatment and declined slowly thereafter, reaching barely detectable concentrations after
8 24 hours. The estimated dietary exposure dose was 13 mg/kg b.w. over the first 24
9 hours, and peak BPA-d6 concentration (18.8 ± 4.4 ng/mL) was observed at 6 hours after
10 the initiation of the BPA-d6-supplemented diet then declining significantly by 11 hours. A
11 similar trend was evidenced for total serum BPA, where concentrations of the conjugated
12 form were up to 70–100 times higher than those of unconjugated BPA (Sieli *et al.*,
13 2011). To compare the oral bolus and diet groups at the same external dose, the dose of
14 the diet-exposed group was scaled to 20 mg/kg b.w., and the AUC(0–24 hour) was not
15 significantly different in the dietary exposed group (227.4 ± 41.1 and
16 201.0 ± 20.6 ng-h/mL in the diet and oral bolus group, respectively). A lower total BPA
17 absorption (81%) was estimated for the diet group: the slightly higher bioavailability
18 associated with diet exposure (113%) was tentatively explained by a “food-effect” (Sieli
19 *et al.*, 2011).

20 These findings and the hypothesis on the effect of food on BPA bioavailability might
21 account for the considerable inter- and intrameal variability in BPA urinary excretion,
22 consistent with an estimated range of exposure from 3.29 to 73.29 µg found in
23 biomonitoring studies (Teeguarden *et al.*, 2011). An additional finding, although not
24 explained yet, is related to concentrations of unconjugated or active BPA-d6 in the diet
25 group which were found to be higher after 7 days of dietary exposure than at 24 hours
26 after exposure, an effect which has not been observed when BPA is administered as a
27 single bolus (Doerge *et al.*, 2010a; Taylor *et al.*, 2011).

28 Different PBPK models have been developed: some are extrapolated from animal models
29 (rat: Teeguarden *et al.*, 2005 and Shin *et al.*, 2010; monkey: Fisher *et al.*, 2011) and
30 others which are human based models (Edginton and Ritter, 2009; Mielke and Gundert-
31 Remy, 2009). Yang *et al.* (2013) developed a PBPK model for neonatal and adult rats
32 with implications for the extrapolation of toxicity studies from neonatal rats to neonatal
33 monkeys or infant humans. In view of the kinetic differences among rodents and
34 primates, those based on primates are considered more appropriate for the extrapolation
35 of data to the human situation, unless the rat based model is refined to account for the
36 enterohepatic re-circulation and features typical of rodent kinetics (Shin *et al.*, 2004) used
37 to describe and predict the blood and tissue concentration time profiles after oral and iv
38 doses in rats and in humans. This PBPK model was employed as an example to estimate
39 the oral dose required to achieve the actual total BPA concentrations in human blood as
40 reported in Korean pregnant women (Shin *et al.* 2010). Additionally, the Teeguarden *et al.*
41 *et al.* model (2005) was later extended to humans.

42 Conclusion

43 Major differences exist in BPA metabolism and disposition between rodents
44 (enterohepatic recirculation and extensive fecal excretion of unconjugated BPA) and
45 primates (extensive urinary excretion of conjugated BPA), that directly affect BPA half-
46 life, which is longer in rats than in primates. Moreover, at the neonatal stage there is a
47 major difference between rodents (rats and mice) and non-human primates. For neonatal
48 rodents, the conjugation of BPA develops with increasing age being very low (especially
49 in mice) at birth. In neonatal non-human primates (NHP), the degree of conjugation was
50 not affected by developmental age. Even in prematurely born infants, >90% of the BPA
51 excreted in the urine was conjugated indicating that prematurely born infants are able to
52 conjugate BPA. Pharmacokinetics in rats and mice with an enterohepatic recirculation
53 may result in the exposure to free BPA, especially in neonatal rats and mice, being higher
54 than in NHP and humans. Therefore, studies in postnatal rats or mice may over-predict
55 adverse outcomes for humans (Shelnutt *et al.*, 2013).

1 The large inter-species differences in internal free BPA dosimetry emphasize the
2 importance of using physiologically based pharmacokinetic (PBPK) modeling to estimate
3 internal exposure in adults, children and infants following different exposure scenarios.
4 The input of enzyme kinetics parameters obtained *in vitro* with human samples in the
5 PBPK models could be an important improvement in BPA risk assessments.

6 Based on recent new toxicokinetic data on different animal species and BPA PBPK models
7 that have become available, EFSA has recently derived a so called human equivalent
8 dose (HED) for oral BPA uptake for extrapolating animal internal BPA exposure data into
9 human internal BPA exposure data (EFSA 2014). The HED is an accepted method for
10 linking a critical effect from the dose-response relationship in animals to predict a level
11 without harmful effects in humans. For the HED approach, EFSA decided to use the
12 above mentioned PBPK model of Fisher *et al.* (2011) to derive internal dosimetrics for
13 oral BPA, as done by Yang *et al.* (2013). These models make it possible to predict the
14 internal BPA exposures in laboratory animals and humans in a route specific manner.

15 **3.8.3. Toxicokinetics after uptake by other routes**

16 Studies on toxicokinetics of BPA available to date have demonstrated a significantly lower
17 internal exposure to free BPA after oral intake as compared to parenteral exposure,
18 essentially due to the highly efficient pre-systemic conjugation to glucuronides and
19 sulfate occurring in the liver and partially in the gut after oral administration
20 independently on the species.

21 Many toxicological studies showing adverse effects used s.c. injections of BPA or
22 alternatively BPA was injected into discrete regions or delivered by osmotic pumps to
23 ensure reproducible dosing. There are differences due to pre-systemic clearance
24 occurring following oral exposure and the slow release of BPA from the oil suspensions
25 during injection/infusion, making a direct comparison inappropriate. For route to route
26 extrapolation, s.c. studies may only be useful if tissue and/or plasma values are used.
27 However, the results of s.c. studies are appropriate for hazard identification or for risk
28 assessment purposes for specific exposure scenarios, when BPA exposure occurs via
29 transcutaneous or parenteral route, as it could be with some medical devices.

30 **3.8.3.1. Toxicokinetics after dermal and** 31 **transcutaneous uptake**

32 Dermal absorption

33 Toxicokinetic study in humans involving dermal exposure are not available, indicating the
34 extent of BPA dermal absorption and the internal dose metrics for free and conjugated
35 BPA. However, *in vivo* study in rats as well as *in vitro* studies on cutaneous penetration
36 using pig skin and human skin samples have been carried out.

37 The European Union in the RAR (ECB, 2003) estimated that the bioavailability of BPA
38 applied on skin was around 10%, but considering the physico-chemical properties of BPA,
39 skin penetration could be expected to be higher: indeed, BPA has a moderate water
40 solubility (K_{ow} of 3.2), $\log P_{ow}$ of BPA is 2.2 and a relatively low molecular weight.

41 The fate of BPA after topical application or skin contact was examined in only a few
42 studies. The oldest one was carried out using deuterated-BPA on isolated perfused bovine
43 udders (Kietzmann *et al.*, 1999), a model that is poorly representative of human skin and
44 not recommended by current guidelines for dermal absorption studies. A study was
45 carried out with ^{14}C -BPA, using full thickness human skin *in vitro* (Mørck *et al.*, 2010),
46 following OECD guideline 428 on skin penetration studies. However, in addition to poor
47 data reporting, results were apparently obtained with an extremely high dose of BPA
48 (17.5 mM corresponding to 3.99 g/L, inconsistent with BPA solubility of 120-300 mg/L
49 water at 25°C (EFSA 2010)): the exaggerated BPA application does not allow any
50 conclusion to be drawn from this study.

1 The percutaneous absorption of ^{14}C -BPA was measured with porcine skin after 10 hours
2 of exposure (Kaddar *et al.*, 2008). The histological and biochemical properties of porcine
3 skin have been repeatedly shown to be close to that of human skin (Jacobi *et al.*, 2007)
4 as well as the thickness of both the stratum corneum and the epidermis. The proportion
5 of radioactivity found in the receptor fluid varied from 0 to 5% of the applied dose over
6 time (0–24 hour), with around 15% recovered in the treated skin (dermis +epidermis) at
7 10 hours, to give an amount of absorbed and potentially 'absorbable' material of 15-
8 20%. Data do not allow an absorption flux for BPA to be calculated. The apparent
9 sequestration by the fatty compartment of the dermis could be explained with the log
10 $P_{o/w} > 2$; on the other hand the possible biotransformation to more water-soluble
11 metabolites through conjugation is expected to progressively increase the transfer in the
12 receptor fluid at longer time. Unfortunately, the study did not report any measurement of
13 possible metabolite formation and did not report on exposure times longer than 10 hours
14 (Kaddar *et al.*, 2008).

15 BPA metabolites were measured in a recent dermal absorption study with ^{14}C -BPA (50–
16 800 nmol) for 72 hours, using both human skin explants and short-term cultures of pig
17 ear skin (Zalko *et al.*, 2011). In short-term cultures (72 hours), the proportion of
18 radioactivity diffused into culture media (trans-dermal passage in the receptor fluid) was
19 ≈ 50 –60%, most of which was associated with BPA–conjugates (ca. 90% of radioactivity
20 in the receptor fluid). However, skin viability (related to metabolic competence) did not
21 significantly modify the absorption rate of BPA thus, questioning the results obtained on
22 metabolites. In human skin explants, the percutaneous absorption measured at 72 hours
23 was 46-58% (of which ca. 10% associated to metabolites); 20–30% of the radioactivity
24 applied on explants was retained at the application site (Zalko *et al.*, 2011). The different
25 results with respect to the Kaddar study could be attributed to longer exposure times (72
26 hours).

27 Marquet *et al.* (2011) performed an *in vivo* and *ex vivo* adsorption study through rat and
28 human skin. Rats were treated with different doses of [^{14}C]-BPA dissolved in acetone (4
29 mg BPA/mL, 50 $\mu\text{l}/\text{cm}^2$). BPA penetrated rapidly into the skin: indeed 1h post exposure
30 the maximal penetration flux was obtained and more than 10% of the applied dose was
31 recovered in the treated skin (with a maximum value of 19% measured after a 4 hour
32 exposure). Moreover, a mean value of $31 \pm 10 \mu\text{g BPA}/\text{cm}^2$ for the skin content did not
33 change significantly at any time during exposure, indicating that there was no
34 accumulation of BPA in the skin. The percentage of dermal absorption was obtained by
35 summing up the excreted radioactivity and the one recovered in the carcass and in the
36 skin at the administration site. Recovery was $\geq 94\%$ in all the different experimental
37 conditions. After an 8 hour exposure, the dermal absorption was approximately 26-29%
38 (at both 8 and 72 hours post exposure time). The amount of radioactivity in the skin
39 decreased progressively during post exposure time (paralleled by increase in the
40 excreted radioactivity), indicating that BPA penetrated in the skin is only partially
41 associated to the stratum corneum (no tape stripping was applied to the treated skin, so
42 that the stratum corneum content could not be quantitated). Dermal absorption
43 increased linearly, with exposure time around 46-51% measured after 24 and 30 hour
44 exposure time.

45 The half-life of BPA after dermal absorption was estimated to be 28 hours (compared
46 with the half-life of 10 hours measured after *i.v.* administration in the same study)
47 (Marquet *et al.*, 2011). When dermal absorption was measured *ex vivo* in human and rat
48 skin at the studied dose, BPA was not cytotoxic for the skin and did not affect the skin's
49 integrity.

50 *Ex vivo* and *in vivo* percutaneous absorption fluxes of BPA after 24h exposure in the rat
51 were in the same range (1.48 and 2.2 $\mu\text{g}/\text{cm}^2/\text{h}$) (Marquet *et al.*, 2011). They found
52 approximately 12-fold lower flux ($0.12 \pm 0.09 \mu\text{g}/\text{cm}^2/\text{h}$) in human skin samples treated
53 *in vitro* in the same conditions (^{14}C -BPA in acetone: 4 mg BPA/mL; 50 and 200 $\mu\text{l}/\text{cm}^2$ for
54 human), however, inter- and intra-individual variability of up to tenfold was observed.
55 The extent of BPA metabolism was estimated by measuring BPA metabolites in the

1 receptor fluid after a 24 hour exposure to BPA on fresh dermatomed rat and human skin
2 samples. For both human and rat skin, unmodified BPA accounted for more than 97% of
3 the radioactivity detected in the receptor fluid, in contrast to results obtained by Zalko *et*
4 *al.* (2011). However, the study's design shows weaknesses by using acetone for BPA
5 dissolution which induces skin damage thus, promoting BPA penetration even though the
6 viability of the skin was demonstrated.

7 Recently, the dermal penetration rate of ¹⁴C-BPA was determined in human skin in an *in*
8 *vitro* test method performed according to the OECD Test Guideline 428 and in compliance
9 with good laboratory practices (GLP) (Demierre *et al.*, 2012). Results indicated a
10 recovery in the receptor fluid of 8.6% of the applied dose (1.82 µg/cm²) and a total
11 amount of bio-available BPA of 9.3% after 24 h incubation, thus, summing up the
12 amount detected in the treated skin after tape stripping. However, the authors excluded
13 the radioactivity recovered in the 15-tape stripping (34.9% of the applied dose),
14 considering it entirely associated to the stratum corneum. According to the EFSA
15 Guidance Document on dermal absorption (EFSA 2012b), only the first two tapes can be
16 strictly considered equivalent to the stratum corneum; therefore, radioactivity recovered
17 in tapes 3-15 (approximately 15-20%) should be added as potentially bioavailable. On
18 this basis, SCENIHR estimated the dermal absorption in the range of 25-30%. At
19 variance EFSA recently assumed that the amount present in the stratum corneum will
20 remain deposited on the skin surface, considering a dermal absorptivalue of 10% (EFSA,
21 2014).

22 The differences of the Demierre *et al.* (2012) results with respect to previous studies
23 have been related to the experimental model and the more realistic exposure conditions
24 in terms of time (24 hours) and BPA concentrations (1.82 BPA µg/cm²). Indeed, the
25 applied dose was slightly higher than the one estimated to be transferred from thermal
26 paper to a single finger (1.13 BPA µg/cm²) and not expected to increase even in case of
27 prolonged or repeated contacts (Biedermann *et al.*, 2010). In addition, in order to be
28 closer to sweat composition, ¹⁴C-BPA was dissolved in pure water and not in organic
29 solvents (alcohol or acetone) as in the previous studies (Mørck *et al.*, 2010; Zalko *et al.*,
30 2011; Marquet *et al.*, 2011). The application of very high BPA doses can greatly influence
31 BPA dermal penetration. Indeed, skin penetration results from passive transfer, and
32 therefore, it is strictly dependent on the gradient between the applied concentration and
33 the concentration in the receptor fluid. The 100-fold higher dose used in the study of
34 Marquet *et al.* (2011) can thus, explain the higher flux in human skin (0.12 and 0.022
35 µg/cm²/h, respectively).

36 By using their previously published and validated PBPK-model (Mielke and Gundert-
37 Remy, 2009), modified to include absorption through skin, Mielke *et al.* (2011) simulated
38 concentrations in blood, liver and kidney after dermal intake of a daily dose of 71 µg/day
39 (0.97 µg/kg/day) as estimated by Biedermann *et al.* (2010) as the worst case exposure
40 scenario for the dermal route with varying extent of absorption (10%, 13%, 46% and
41 60%) to account for the various data available in the literature. They compared
42 concentrations which would result from the intake of BPA on the dermal route with those
43 which would result from the oral administration at the TDI. Results indicated that after
44 dermal exposure concentrations in blood, kidney were higher and in the liver were lower
45 as compared to the oral route due to the high first pass in the liver. Whatever the extent
46 of dermal absorption used, the dermal dose of 0.97 µg/kg/day gives rise to an AUC and
47 Cmax lower (up to 10- and even 70-fold for the highest absorption value used) than 50
48 µg/kg/day (corresponding to the t-TDI) by the oral route.

50 Summarizing, the available data indicate that at the estimated exposures, BPA
51 penetrated rapidly into the skin by passive transfer at a percentage around 25-30% of
52 the applied dose. The possible skin metabolism is controversial, since contrasting results
53 were reported. However, not considering metabolism in the skin prior to systemic
54 distribution will represent a conservative approach. Therefore, as a worst-case, a

1 systemic bioavailability equal to 30 % of the applied dermal dose can be used for risk
2 assessment purposes.

3 Subcutaneous injection

4 Toxicokinetics studies were performed on rats and mice after oral and s.c. administration
5 of 100 µg/kg b.w. BPA using the same experimental design (Doerge et al, 2010a,
6 2011a). Levels of free and conjugated deuterated BPA were measured in neonatal,
7 immature and adult animals (post-natal day, PND 3, 10 and 21). Animals were given a
8 single dose, which was demonstrated to be within the linear range of pharmacokinetics,
9 so that extrapolation to lower doses is feasible.

10 Administration of 100 µg/kg b.w. BPA by s.c. injection to PND 3 rats produced 34-fold
11 higher C_{max} and 17-fold higher AUCs for free BPA compared to oral administration. The
12 age-related changes in serum levels of free BPA observed after oral administration were
13 not evidenced after s.c. injection. This indicates that first pass effect is not relevant after
14 s.c. treatment and confirmed that on the contrary the first pass effect is relevant after
15 the oral exposure even in early postnatal pups, although characterised by a lower
16 conjugation activity.

17 In mice, administration of the same dose of BPA by either gavage or s.c. injection,
18 indicated that, unlike adult mice, serum levels of free BPA were consistently detected in
19 pups of all ages at early post-dosing time points (Doerge et al, 2011a). These results are
20 in line with previously reported data by Taylor et al. (2008), although the differences in
21 the experimental design between the two studies make quantitative comparison quite
22 difficult. However, this information may be relevant for the interpretation of some toxicity
23 studies carried out by administering BPA by s.c. injection. This feature can be explained
24 by considering that the particularly pronounced metabolic immaturity of PND 3 mice
25 abrogates the route of administration effect observed for injection of BPA into neonatal
26 rats (Doerge et al., 2010a) and monkeys (Doerge et al., 2010b); this difference is no
27 longer present at PND 10 and 21 pups which have developed their conjugation activities,
28 so that s.c. injection results as expected in higher levels of free BPA, having by-passed
29 the presystemic BPA clearance in the GI tract and liver, typical of the oral route.

30 Similar results were obtained in another study (Prins et al., 2011), comparing BPA
31 pharmacokinetics in neonatal rats following s.c. injection or oral delivery of 10 µg BPA/kg
32 b.w.. Free and total BPA at max were 1.77 and 2.0 ng/mL, respectively following s.c.
33 injection with an initial peak of free BPA in blood that was not seen after oral exposure
34 (after which max values for free and total BPA were 0.26 and 1.02 ng/mL, respectively).
35 After s.c. injection, 88%, 52% and 31% of BPA was in the free form at 30 min, 1 hour
36 and 2 hours, respectively. After 2 hours, the differences in serum free BPA levels were no
37 longer statistically different between the oral or s.c.-treated groups (Prins et al., 2011).

38

39 **3.8.3.2. Toxicokinetics after intravenous** 40 **administration**

41 In rhesus monkey administered with stable isotope-labeled ¹³C₁₂-BPA (100 µg/kg b.w.)
42 to avoid background contamination, the total BPA levels were higher following i.v.
43 administration (29±19% of the administered dose at 5 min post-injection) than after oral
44 administration of the same dose (0.21±0.14% of total BPA at 30 min post-gavage),
45 confirming that the systemic availability of free BPA in monkeys is much lower after oral
46 exposure than after parenteral exposure (Doerge et al., 2010b).

47 Overall, these findings are in line with those obtained in the rat with a similar
48 experimental design (Doerge et al., 2010a). Free BPA was rapidly eliminated from the
49 circulation (> 50% of circulating BPA was conjugated 5 min after i.v. injection), with a
50 half-life of 0.66 h following i.v. administration; however, the fraction present as
51 conjugated BPA was substantially lower following i.v. administration compared to oral
52 (55% vs. 99.5%) due to the absence of first-pass conjugation. After i.v. exposure the

1 percentage of free BPA was higher in adult rats than in monkeys ($52 \pm 10\%$ vs. $29 \pm$
2 19% at 5 min post-injection) (Doerge *et al.*, 2010a and 2010b).

3 When [^{14}C]-BPA (10, 50, 100, 500, and 1,000 $\mu\text{g}/\text{kg}$ b.w.) was administered i.v. to rats
4 ($n = 3-6$) regardless of the dose administered, the percentage of [^{14}C] excreted in faeces
5 and urine were not significantly different, confirming no saturation of the excretion
6 pathway (Marquet *et al.*, 2011). The total recovery was in the range of 90–101% of the
7 administered dose. Radioactivity was predominantly excreted in faeces (63–75% of the
8 excretion over the 72 hours), whereas within this period, urinary excretion accounted for
9 about 12–22% of the total excreted [^{14}C] and occurred essentially in the first 24 hours
10 after administration (Marquet *et al.*, 2011).

11 The i.v. administration to female CD-1 mice of stable isotope-labeled $^{13}\text{C}_{12}$ -BPA (100
12 $\mu\text{g}/\text{kg}$ b.w.) indicated a rapid distribution of free BPA into the tissues ($t_{1/2} = 0.2$ h) with a
13 nearly as rapid terminal elimination phase ($t_{1/2} = 0.8$ h). Clearance of the parent
14 compound was mainly due to the rapid formation of Phase II conjugates: unconjugated
15 d6-BPA was undetectable in serum by 8 h (<0.2 nM). However, the total BPA (mostly
16 accounting for conjugated forms) was eliminated more slowly from the circulation ($t_{1/2} =$
17 6.6 h), due to enterohepatic recirculation, suggested by the presence of an apparent "re-
18 entry peak" at 2 hours for total but not for free BPA (Doerge *et al.*, 2012). Therefore,
19 enterohepatic re-circulation does not appear to significantly affect the serum/tissue levels
20 of free BPA, but prolongs the elimination of BPA conjugates, as after "re-entry", a first-
21 pass effect occurs again.

22 When the possible sequestration by the adipose tissue was investigated following i.v.
23 administration of deuterated BPA (100 $\mu\text{g}/\text{kg}$ b.w.), limiting interference by background
24 BPA levels, it showed that free BPA was rapidly taken up into adipose tissues ($t_{1/2} = 0.07$
25 h), with maximal levels observed at 0.25 h, followed by a slower terminal elimination
26 phase similar to that for conjugated BPA ($t_{1/2} = 7.0$ h) (Doerge *et al.*, 2012). The
27 maximal level of free BPA in adipose tissue did not exceed the initial measured serum
28 level. These data support a rapid equilibrium of BPA in the blood with tissues, including
29 fat, such that the redistribution of BPA from adipose tissue follows in parallel.

30 About 2.5–4 ng deuterated BPA/g for 100 mg tissue were detected (Doerge *et al.*, 2012),
31 These values are within the same concentration range previously reported for free BPA in
32 human adipose tissue even though different methodologies were used (Fernandez *et al.*,
33 2007; Geens *et al.*, 2012).

34 Despite a high adipose tissue/serum partition ratio (6.9) and minimal competence in
35 conjugation (% unconjugated BPA = 90%), BPA was eliminated from adipose tissue at a
36 rate similar to that for BPA conjugates in the whole organism. These observations
37 confirm the non-persistent nature of BPA in vivo, mainly due to its extremely efficient
38 conjugation and elimination in urine (primates and partially rodents) and bile (rodents
39 only) and are in line with its aqueous solubility (100–300 mg/l), moderate lipid
40 partitioning ($\log K_{o/w} = 3.3$), and the fat/serum distribution ratio in female rats and
41 mice (5 and 7, respectively) (Doerge *et al.*, 2011b; 2012). No significant bioaccumulation
42 was reported when 11 adult female rhesus macaques were fed 400 $\mu\text{g}/\text{kg}$ deuterated
43 BPA (dBPA) daily for 7 days (Taylor *et al.*, 2011).

44 The possible accumulation of BPA in adipose and other tissues, due to chronic exposure
45 to low levels hypothesised by some authors (Stahlhut *et al.*, 2009; Hugo *et al.*, 2008;
46 Nunez *et al.*, 2001), is, therefore, not supported by experimental data.

47

48 **3.8.3.3. Toxicokinetics after inhalation**

49 No data are available on kinetics following inhalation exposure, which on the other hand
50 seems not to be a relevant route of exposure for the general population (Wilson *et al.*,
51 2007; Geens *et al.*, 2009; von Goetz *et al.*, 2010). However, this route of exposure may
52 be relevant for medical devices in view of tracheal intubations. The only information

1 available is the lack of BPA-glucuronidation shown by human lung microsomes (Trdan
2 Lušin et al, 2012), suggesting the absence of relevant pre-systemic inactivation after
3 absorption through the lung epithelium.

4 5 **3.8.4. Special considerations on susceptible** 6 **populations**

7 Different susceptibilities for BPA have been postulated for some specific subgroups,
8 including fetuses, infants, and older people. The age dependence of the toxicokinetics of
9 BPA and its conjugated metabolites was studied by applying PBPK modelling to estimate
10 levels of BPA in the blood in young children after oral exposure (Edginton and Ritter,
11 2009; Mielke and Gundert-Remy, 2009). The oral absorption can be considered
12 complete, that is around 90% (although this % is a conservative estimate for neonates,
13 since the immature pancreatic and biliary secretion and the scant presence of intestinal
14 flora up to the 8th month can limit the absorption of BPA in infants (Ginsberg *et al.*,
15 2002).

16 Edginton and Ritter (2009) built their PBPK model using information from toxicokinetic
17 studies in adults, and scaled to children <2 years of age, by replacing the age-dependent
18 physiologic parameters relevant for kinetics in newborn. The average free BPA modelled
19 plasma concentrations at steady state in newborns and 3 months-old infants were 11 and
20 2 times greater than that in adults (after a dose of 1 µg/kg b.w./day).

21 The model by Mielke and Gundert-Remy (2009) included not only the age-dependent
22 UDPGT-mediated BPA conjugation but also took into account the sulfation pathway,
23 assuming SULT activity toward BPA to be about 15% of that of glucuronidation,
24 independently of the age (being already expressed at high levels starting from
25 intrauterine life). They reported a children/adult ratio in free BPA in blood of about 3
26 (0.44 µg/L versus 0.13 µg/L): the difference between the two studies may be explained
27 with both the pattern of exposure and the consideration of sulfation in BPA metabolism.
28 The simulation by Mielke and Gundert-Remy underlines the importance of taking both
29 pathways (i.e. glucuronidation and sulfation) into account and suggests that the well-
30 expressed sulfation activity in the newborn can compensate at least partly for the lower
31 glucuronidation activity in neonates.

32 In order to perform a comparison of BPA dosimetry across species including humans,
33 Yang *et al.* (2013) applied the monkey-based PBPK model of Fisher *et al.* (2011) for the
34 prediction of internal dosimetrics in human newborns and adults. After a simulated daily
35 oral administration repeated up to 14 days, the C_{max} was 0.23 nM and 0.51 nM and the
36 AUC was 1.53 and 1.80 nM per hour for human newborns and adults, respectively, with a
37 ratio lower than the ones previously predicted by Edginton and Ritter (2009) and Mielke
38 and Gundert-Remy (2009).

39 Pregnant women show slightly elevated glucuronidation activity when compared to non-
40 pregnant women, and therefore, are characterized by a higher efficiency in detoxifying
41 BPA. This is relevant also for *in utero* exposure for the embryo/foetus, the exposure of
42 which depends on maternal blood concentrations. The issue of *in utero* exposure has
43 been extensively discussed in the EFSA opinion (EFSA, 2010).

44 There is no indication that the elderly are at risk, since their metabolic capacity
45 associated to phase II enzymes is not affected. However, chronic diseases such as those
46 characterised by impaired hepatic or renal functionality can be of relevance, especially if
47 associated to the prolonged use of medical devices as for dialysis patients.

48 49 **3.8.5. Conclusions**

50 The available data on BPA in animals and humans indicate that there is a marked
51 difference between the possible routes of exposures: the internal exposure after oral

1 intake being much lower as compared to dermal or parenteral exposure. In addition,
2 after oral administration a species-specific difference exists in BPA kinetic, indicating that
3 BPA is eliminated faster in humans than in rats, resulting in a lower internal exposure to
4 free BPA in humans. The direct consequence of these differences are: i) the limited
5 representativeness of rat toxicity data in risk assessment when not associated to specific
6 route of exposure result in in a relative higher exposure after oral intake ii) the indication
7 that the default assumption that human are more susceptible than rodents is not
8 completely correct at least for the kinetic component.

9 The oral absorption can be considered complete, that is around 90% (although this % is
10 a conservative estimate for neonates, since the immature pancreatic and biliary secretion
11 and the scant presence of intestinal flora up to the 8th month can limit the absorption of
12 BPA in infants (Ginsberg *et al.*, 2002). However, the systemic bioavailability of free BPA
13 is dramatically reduced by the first pass effect to 2.8%, 0.2%, 0.9% and less than 1% in
14 rats, mice, monkeys, and dog, respectively. The systemic availability of unconjugated
15 BPA in humans has not been evaluated experimentally, however, modelled data indicated
16 that internal exposure in humans to unconjugated BPA is very low (1-10%). This
17 estimate was confirmed by results from controlled biomonitoring studies in humans
18 showing that unconjugated BPA in serum is below the LOD of 0.3 ng/ml (= 1.3 nM),
19 confirming that internal exposure to unconjugated BPA is extremely low.

20 After dermal exposure, the absorption fraction can be considered around 25-30% of the
21 applied dose, which is directly systemically bioavailable.

22 For all the parenteral routes of exposure (including i.v., i.p., transdermal or
23 subcutaneous), the chemical is 100% systemically bioavailable: however, the clearance
24 of free BPA from the circulation appeared to be quite fast, as indicated by controlled
25 studies in non human primates showing a half-life of 0.66h with >50% of circulating BPA
26 already conjugated 5 min after i.v. injection.

27 The available modelled data, obtained considering after oral exposure, also point out that
28 newborns and babies up to 6 months constitute a potentially susceptible subpopulation
29 due to immature BPA metabolism. However, the default uncertainty factor which is used
30 to account for the toxicokinetic variability in the general population seems to be large
31 enough to cover the variability in the newborn population exposed via the oral route.
32 Analogously, inter-individual differences in the expression of the isoenzyme mainly
33 responsible for BPA glucuronidation are within a factor of 4, again covered by the usual
34 uncertainty default factor, at the estimated dietary exposures.

35 Based on animal data and PBPK modelling, it is possible to provide internal dose metrics
36 for neonatal-to-adult stages and for different routes of exposure. More recently EFSA
37 derived a human equivalent dose (HED), a concept that can be used to derive internal
38 human exposure data for BPA, to be applied to Points of Departure derived from animal
39 studies (EFSA 2014).

40

41 **3.9. Toxicity**

42

43 **3.9.1. General toxicity studies**

44

45 **3.9.1.1. Acute toxicity**

46 Oral LD50 values above 2,000 mg/kg b.w./day were reported in the rat and mouse, and
47 dermal LD50 values above 2,000 mg/kg b.w./day have been reported in the rabbit. For
48 inhalation, a 6h exposure to 170 mg/m³ (the highest attainable concentration) produced
49 no deaths in rats; slight and transient slight nasal tract epithelial damage was observed.

1 These data indicate that BPA is of low acute toxicity by all routes of exposure relevant to
2 human health (EC, 2003, 2008, 2010a,b).

3 The effects of single oral exposure to BPA in humans are not well documented. In a
4 kinetic study in healthy volunteers, a dose of 5 mg BPA (range 54.3 to 87.7 µg/kg) was
5 well tolerated (Völkel *et al.*, 2002).

6

7 **3.9.1.2. Chronic toxicity (repeated-dose) studies**

8 Mice and rats

9 *Oral*

10 Several repeated dose toxicity studies have been performed in rodents which were
11 extensively revised in the previous evaluations and are, therefore, not all recapitulated
12 here.

13 Dietary studies in mice indicated that the liver is a target organ in this species, with
14 changes being observed in the size and nucleation state of hepatocytes in 2-year and 90-
15 day studies (US NTP, 1982). It was not possible to identify a no effect level for males in
16 the 90 day study as the effect was observed at all dose levels used in males, the lowest
17 doses being 120 mg/kg b.w./day. In females, in the 2-year study a no-adverse-effect
18 level of 650 mg/kg b.w./day was established based on reduction of body weight gain.
19 Thus, the LOAEL in males is 120 mg/kg b.w./day and the NOAEL 650 mg/kg b.w./day in
20 females. A NOAEL of 74 mg/kg b.w./day has been established for rats from a 2-year
21 study based on reduced bodyweight gain at the next dose level of 148 mg/kg b.w./day.

22 Tyl *et al.* (2002, 2008) conducted a dose-range finding study and two large
23 multigenerational studies in rats and mice using dietary administration of BPA with doses
24 ranging from 1 or 3 µg/kg b.w./day up to 500 or 600 mg/kg b.w./day. These studies
25 demonstrated effects on the liver, kidney and body weight at doses of 50 mg/kg
26 b.w./day and higher. Chronic inflammation of the liver was seen from 50 mg/kg b.w./day
27 in the 3-generation study, but with no convincing dose-response relationship. These liver
28 effects in rats were thus considered to be background variation and not treatment-
29 related. Renal tubule degeneration of the kidney was also seen in this 3-generation study
30 in females at 500 mg/kg b.w./day but not at 50 mg/kg b.w./day. Hence, the NOAEL for
31 kidney effects is 50 mg/kg b.w./day. In mice, the NOAEL based on effects on liver was 5
32 mg/kg b.w./day. Stump *et al.* (2010), used a wide dose range in rats, performing a study
33 on neurotoxicity according to OECD 426 and based on reduced body weight or body
34 weight gain respectively identified a lowest no-observed-adverse-effect level (NOAEL) of
35 5.85 mg/kg b.w./day.

36 *Inhalation*

37 In an inhalation study in rats, slight inflammation and hyperplasia of the olfactory
38 epithelium were observed at an exposure level of 50 mg/m³ (6 hours/day, 5 days/week
39 for 13 weeks) the NOAEL being 10 mg/m³ (EC, 2003, 2008).

40 *Dogs*

41 In a 90-day dietary study in dogs, a no effect level of approximately 80 mg/kg b.w./day
42 was identified, with increases in relative liver weight being the only finding observed at
43 approximately 270 mg/kg b.w./day. In the absence of histopathology this finding is of
44 uncertain toxicological significance. (EC 2003, 2008).

45 In conclusion, BPA is of low acute toxicity, and the lowest NOAEL for subchronic exposure
46 currently available is approximately 5 mg/kg b.w./day, based on effects on the liver as
47 target organ, as identified in several studies. The next lowest NOAEL is 50 mg/kg
48 b.w./day, based on effects on the kidney.

49

3.9.2. Genotoxicity

In vitro assays

Studies of the potential of BPA to induce mutations, chromosomal aberrations, sister chromatid exchange and transformation in a variety of *in vitro* test systems are largely negative, including studies with *Salmonella typhimurium*, Chinese hamster V79 cells, Syrian hamster embryo cells and mouse lymphoma cells (NTP, 2008). However, deoxyribonucleic acid (DNA) damage was induced by BPA in MCF-7 and MDA-MB-231 cells (Iso *et al.*, 2006). DNA adduct formation in Syrian hamster ovary cells (Tsutsui *et al.*, 1998, 2000) and a number of positive findings have been reported for the potential for BPA to inhibit purified microtubule polymerization, affect the spindle apparatus and produce aneuploidy in *in vitro* studies with Chinese hamster V79 cells or oocytes from BALB/c or MF1 mice (US NTP, 2008).

BPA appears to have demonstrated aneugenic potential *in vitro*, positive results being observed without metabolic activation in a micronucleus test in Chinese hamster V79 cells and in a non-conventional aneuploidy assay in cultured Syrian hamster embryo cells. Additionally, in cell-free and cellular systems there is information that shows BPA disrupts microtubule formation. BPA has been shown to produce adduct spots in a post-labelling assay with isolated DNA and a peroxidase activation system, but it does not appear to produce either gene mutations or structural chromosome aberrations in bacteria, fungi or mammalian cells *in vitro*. (EFSA 2010)

In the study by Tiwari *et al.* (2012), negative results were obtained at concentrations up to 200 µg/plate in an Ames assay using tester strains of *S. typhimurium* TA 98, TA 100 and TA 102 in the presence and absence of S9 metabolic activation.

In the study by Audebert *et al.* (2011), BPA was shown to be negative for induction of phosphorylated histone γ -H2AX, a marker for induction of DNA double strand breaks, in HepG2 and LS174T (human epithelial colorectal adenocarcinoma cells).

Concerning the studies available before 2010, EFSA (2010) noted that the conduct of these studies had some deficiencies and the negative results cannot be taken as conclusive. BPA does not appear to be aneugenic *in vivo*, because a recently conducted, standard mouse bone marrow micronucleus test has given a negative result (EFSA 2010). Any aneugenic potential of BPA seems to be limited to *in vitro* test systems and is not of concern when follow up *in vivo* studies show negative results. The relevance of the finding that BPA can produce rat hepatic DNA adduct spots in a postlabelling assay is not entirely clear. However, given the absence of positive results for gene mutation and clastogenicity in cultured mammalian cell tests, it seems unlikely that these are of concern for human health. The newer studies are not indicative of an *in vitro* genotoxicity of BPA.

In vivo studies

Hunt *et al.* (2003) investigated the effects of short-term, low-dose exposure to BPA on the meiotic processes of female mice during the final stages of oocyte growth. Although BPA can affect chromosomal structure during replication in *in vitro* studies, the outcomes of similar assessments when the chemical is administered to laboratory mice are inconsistent and inconclusive. The striking findings of meiotic aneuploidy in oocytes of mice (Hunt *et al.*, 2003; Susiarjo *et al.*, 2007) have not been independently replicated, and the failure to observe clear effects on fertility or cancer associated with BPA exposures during development suggests that the findings are of limited biological significance.

In the study by Masuda *et al.* (2005) intended to simulate stomach environment and its influence on genotoxicity by studying the reaction of BPA and nitrite under acidic conditions, BPA did not induce micronuclei in peripheral blood reticulocytes when administered at 228 mg/kg b.w. by oral gavage to male ICR mice.

1 Following several treatment modalities (single oral gavage treatment at 0.2 and 20
2 mg/kg b.w., seven daily administrations of 0.04 mg/kg b.w. by oral gavage or seven
3 weeks drinking water at 0.5 mg/l) Pacchierotti *et al.* (2008), evaluated potential
4 aneugenic effects of BPA on mouse female germ cells. Following six daily administrations
5 of BPA of 0.002, 0.02 and 0.2 mg/kg b.w. by oral gavage, effects on male germ and
6 induction of micronuclei in bone-marrow cells were investigated (Pacchierotti *et al.*,
7 2008). No significant induction of hyperploidy or polyploidy in oocytes and zygotes was
8 observed at any dose-level and treatment condition employed. Similarly, no induction of
9 hyperploidy or polyploidy in epididimal sperms were observed in male mice. Negative
10 results on induction of micronuclei in bone marrow cells of male mice were also obtained.

11 Izzotti *et al.* (2009) studied BPA induction of DNA adducts, detected by ³²P-postlabelling
12 in liver and mammary cells of female CD-1 mice (BPA in drinking water, dose equivalent
13 to 200 mg/kg b.w./day for 8 days). Treatment related bulky DNA adducts (two major
14 DNA adducts) were observed in liver and in mammary cells. The authors attributed the
15 formation of adducts to the reactive metabolite BPA-3,4-quinone (BPAQ). However, as
16 the chemical characterization of DNA adducts was not performed, unspecific covalent
17 binding to DNA cannot be excluded.

18 The results of Naik *et al.* (2009) indicate that no significant increases of chromosomal
19 aberrations or micronuclei were induced at 10, 50 and 100 mg/kg b.w. or five daily
20 administrations at 10 mg/kg b.w. by oral gavage. It can be concluded that BPA under the
21 reported experimental conditions was not clastogenic and did not elicit micronuclei
22 induction, which would be indicative of a clastogenic and/or aneugenic potential at dose-
23 levels employed.

24 De Flora *et al.* (2011) did not find induction of micronuclei in bone marrow cells and
25 positive comet assay in peripheral blood cells after a treatment with 200 mg/kg b.w. BPA
26 for 10 consecutive days.

27 Ulutaş *et al.* (2011) studied the effect of BPA (oral administration of 125 and 250 mg/kg
28 b.w./day for four weeks) in the alkaline comet assay. No effect was observed at the
29 lower dose-level (125 mg/kg b.w./day) whereas at 250 mg/kg b.w., the positive results
30 might be explained by cytotoxicity which was not clearly ruled out.

31 Dobrzyńska and Radzikowska (2013) showed that BPA induced statistically significant
32 increases of DNA breaks (DNA tail moment in the alkaline comet assay) in male germ
33 cells at 24 hours and 5 weeks from last administration of test compound and in bone
34 marrow, spleen, kidney and lung cells at 24h from last administration of 5, 10, 20 or 40
35 mg/kg b.w. per day in drinking water for 2 weeks. The increases observed were not
36 dose-related and were obtained following collection of organs/tissues 24h or 5 weeks
37 after last administration. Significant increases observed indiscriminately at 24h and at 5
38 weeks from last administration raise questions about the reliability of the results. In
39 addition, the authors did not evaluate cytotoxicity. Hence, no conclusion could be drawn
40 from this study.

41 Tiwari *et al.* (2012) investigated oral exposure of BPA investigated for induction of
42 micronuclei and structural chromosome aberrations in bone marrow cells and primary
43 DNA damage in blood lymphocytes using single cell gel electrophoresis ("Comet assay").
44 Furthermore, plasma concentrations of 8-hydroxydeoxyguanosine (8-OHdG), lipid
45 peroxidation and glutathione activity were also evaluated to assess potential induction of
46 oxidative DNA damage in rats following the oral administration of test compound once a
47 day for 6 consecutive days at dose-levels of 2.4 µg, 10 µg, 5 mg and 50 mg/kg b.w./day.
48 The observed increases achieved statistical significance at a dose-level of 10 µg/kg
49 b.w./day and higher. Similarly, the analysis of primary DNA damage evaluated by comet
50 assay, in isolated peripheral blood lymphocytes showed marked and dose-related
51 increases. However, the study of Tiwari *et al.* (2012) has several shortcomings which
52 include the staining procedure used to detect micronuclei in the bone marrow cells, the
53 micronuclei data reporting, the observation of chromosomal aberration figures which are
54 not generally induced by known chemical clastogens, and the absence of evaluation of

1 cytotoxicity in the comet assay. Hence, the reported dose-related increases of both
2 micronuclei and structural chromosome aberrations in bone marrow cells in a dose range
3 between 10 µg/kg b.w. up to 50 mg/kg b.w. for six days are difficult to interpret and
4 cannot be considered reliable in view of the methodology used. In a preliminary study
5 with two doses (10 µg/kg b.w./day and 5 mg/kg b.w./day) in male rats, oral BPA by
6 gavage for 6 days induced for both doses a decrease in sperm production (Tiwari and
7 Vanage 2013). In addition, the highest dose of 5 mg/kg b.w./day induced sperm DNA
8 damage as demonstrated in a comet assay.

9 10 Overall Conclusions on genotoxicity of BPA

11 The genotoxicity of BPA has been reviewed elsewhere (Haighton *et al.*, 2002; ECB, 2003;
12 EFSA, 2006; US NTP-CERHR, 2008; EFSA, 2010; WHO, 2010). Additional and new
13 publications were reported and evaluated in this part. BPA did not induce *in vitro* gene
14 mutation in bacteria (Masuda *et al.*, 2005; Tiwari *et al.*, 2012) and *in vivo* micronuclei in
15 rodent bone marrow assays (Masuda *et al.*, 2005; Pacchierotti *et al.*, 2008; Naik *et al.*,
16 2009; De Flora *et al.*, 2011). BPA is aneugenic in an *in vitro* study in mammalian cells by
17 Johnson and Parry (2008) due to a spindle disrupting effects of BPA. This effect has also
18 been demonstrated by induction of colchicine-like metaphases (C-metaphases) in
19 mammalian cells *in vitro* (Tayama *et al.*, 2008) and *in vivo* by induction of prematurely
20 separated chromatids in metaphase II of mouse oocytes (Pacchierotti *et al.*, 2008) and c-
21 metaphases in mouse bone marrow cells *in vivo* (Naik *et al.*, 2009). Obviously, BPA does
22 not interact with DNA directly but it acts on the mitotic spindle apparatus, an effect which
23 is thought to be thresholded (COM Guidance on a Strategy for Testing of Chemicals for
24 Mutagenicity, Department of Health, UK, 2000).

25 The large margin between the dose-levels found negative *in vivo* for induction of
26 aneuploidy in rodent germ cells (Pacchierotti *et al.*, 2008) and for induction of
27 micronuclei in somatic bone marrow cells (Masuda *et al.*, 2005; Pacchierotti *et al.*, 2008;
28 Naik *et al.*, 2009; De Flora *et al.*, 2011) provides adequate reassurance on the lack of
29 aneugenic effects of BPA *in vivo*.

30 In conclusion, BPA is not likely to pose a genotoxic hazard to humans.

31 **3.9.3. Carcinogenicity**

32 BPA studies

33 In the traditional rodent cancer bioassay (US NTP, 1982), BPA was tested in F 344 rats at
34 2 dose levels of approximately 74 and 140 mg/kg b.w./day, and in B6C3F1 mice at dose
35 levels of 130 and 835 mg/kg b.w./day in male mice and 835 and 1670 mg/kg b.w./day in
36 female mice. The number of animals was 50 per group. Gross morphological and
37 histopathological investigations were performed, whereas no clinical chemistry or
38 haematological investigations were performed, which was the standard procedure at that
39 time. There was a marginally increased rate of leukemias in male rats, which disappeared
40 after Bonferroni adjustment; leukemias were also seen in female rats and male mice; the
41 increased incidence not being statistically significant. Statistically significant increase
42 interstitial cell carcinomas of the testes were attributed to the ageing of the rats. It
43 should be mentioned that the part of the study done in rats is somewhat compromised
44 by the fact that among male rats in the control group, only about 50% of the rats
45 survived, whereas in females the survival rate was about 70%. In mice, survival was
46 about 80%.

47 The authors of the study concluded that under the condition of the bioassay (US NTP,
48 1982) there was no convincing evidence that the substance was carcinogenic to F 344
49 rats or B6C3F1 mice of both sexes. Other assessments (e.g. FAO/WHO, 2011) followed
50 this interpretation of the study results.

51 No inhalation or dermal carcinogenicity studies are available, although in repeat exposure
52 inhalation toxicity studies, BPA did not exhibit properties that raise concern for potential

1 carcinogenicity. Only minimal inflammation was seen in the upper respiratory tract at 50
2 mg/m³ in a 13-week study and the severity did not increase up to concentrations close to
3 the maximum attainable concentration in the experimental system used, 150 mg/m³ (EC
4 2003).

5 The United States National Toxicology Program (NTP) bioassay did not include exposures
6 during the peri-natal period. Later studies addressed this point.

7 Studies that included perinatal (gestational and/or lactational) exposures to BPA (oral
8 doses to the dam from ~10 to 250 µg/kg b.w./day) have reported, among other lesions,
9 proliferation of mammary ductal epithelium and squamous metaplasia of prostatic
10 epithelium in offspring, conditions suggested to predispose to neoplasia (Timms *et al.*,
11 2005; Moral *et al.*, 2008). Additional treatments with initiating or promoting agents have
12 led to earlier onset of mammary tumours (Jenkins *et al.*, 2009) or prostatic intraepithelial
13 neoplasia (Prins *et al.*, 2011). Further studies used transgenic animals. An overview of
14 carcinogenic studies including those using a co-treatment with a known carcinogen are
15 presented in table 5.

1 **Table 5. Pre- and perinatal exposure in carcinogenic studies with and without inducing agents**

Author	species	dose (mg/kg b.w./day)	treatment duration	co-treatment	outcome
All organs					
Takashima <i>et al.</i> , 2001	rat	0, 400-600 (one dose level) in drinking water	10 week before mating until end of lactation	N-nitrosobis-(2-hydroxypropyl)-amine	BPA during development does not exert promoting effects on BHP-induced thyroid, lung, liver, thymus and esophagus carcinogenesis
Ichihara <i>al.</i> , 2003	rat	0, 0.05, 7.5, 30, and 120 by gavage	pregnancy and lactation	3,2-dimethyl-4-aminobiphenyl	Without DMAB treatment, incidences of prostatic intraepithelial neoplasia (PIN), carcinoma, and atypical hyperplasia were not increased
Uterus					
Yoshida <i>et al.</i> , 2004	rat	0, 0.006 and 6 oral	GD 2 to PND 21	N-ethyl-N'-nitro-nitrosoguanidine	incidence of uterine preneoplastic or neoplastic lesions induced by ENNG was not increased by BPA exposure
Leydig cell division					
Nanjappa <i>et al.</i> , 2012	rat	0.0025, 0.025 gavage	GD 12 to PND 21		prepubertal period and increased Leydig cell numbers were shown in the testes of adult male rats at 90 days
Prostate					
Ho <i>et al.</i> , 2006	rat	0.01 sub-cutaneous	PND 1, 3 and 5	17 β -estradiol (E) and testosterone (T) by sub-cutaneous implantation for 16 weeks	BPA/E+T 10/10 E+T 4/10 prostatic intraepithelial neoplasia (PIN)
Prins <i>et al.</i> , 2011	rat	0.01 sub-cutaneous 0.01 oral	PND 1, 3 and 5	17 β -estradiol (E) and testosterone (T) by sub-cutaneous implantation for 16 weeks	PIN BPA/E+T >E+T; no difference between oral and sc
	rat	0 or 0.025 subcutaneous	GD 8-23	N-nitroso- N-methylurea	BrdU/apoptosis ratio was significantly increased and apoptosis was significantly decreased in mammary parenchyma and stroma

Tang <i>et al.</i> , 2012	rat	0.01 sub-cutaneous administration in three doses	PND 1, 3, and 5	E+T	in prostate hypomethylation of the promoter of nucleosom binding protein-1 persisting until day 100; hypermethylation of hippocalin-like1 which shows changes throughout life; persistent overexpression of four of eight genes functioning in methylation/demethylaton of DNA
Mammary gland					
Durando <i>et al.</i> , 2007	rat	25 µg/kg b.w. subcutaneous	GD8 to GD23	additional groups: NMU (25 mg/kg)	1. No NMU tretamen: increased proliferation/apoptosis ratio 2-NMU treatment: increased percentage of hyperplastic ducts and induced the development of neoplastic lesions
Murray <i>et al.</i> , 2007	rat	0, 0.0025, 0.025, 0.250, or 1 subcutaneous	GD 9 through PND 1		3-4-fold increase mammary hyperplastic ducts in all dose groups; increased cribriform structures in the 0.250 and 1 mg/kg b.w.
Vandenberg <i>et al.</i> , 2008	mice	0.25, 2.5, 25 µg/kg b.w SC	GD 8 through PND 16		intraductal hyperplasias, alveolar buds
Moral <i>et al.</i> , 2008	rat	25, 250 µg/kg b.w. orally	GD 10 to delivery		increase in mammary hyperplastic ducts
Jenkins <i>et al.</i> , 2009	rat	0, 25, and 250 µg BPA/kg b.w. orally dosing to dams	during lactation (PND1-PND20)	additional groups received 30 mg DMBA/kg body weight 0n PND 50	1.no DMBA treatment: increased cell proliferation and decreased apoptosis at 50 but not 21 days postpartum 2. DMBA treatment: dose-dependent increase in mammary tumour multiplicity and reduced tumour latency compared to controls
Betancourt <i>et al.</i> , 2010	rat	25, 250 µg/kg b.w. orally	GD 10 to GD21	additional groups received DMBA; 30 mg/kg b.w.. on PND 50, or PND100.	1.no DMBA treatment: increased cell proliferation 2. DMBA treatment only on day 100 but not on day 50: increased tumor incidence while decreasing tumor latency
Jones <i>et al.</i> , 2010	Brca1 knockout	0.000250 continously sc	4 weeks		increased mammary epithelial cell proliferation and hyperplasia

	mouse				
Jenkins <i>et al.</i> , 2011	transgenic MMTV-erbB2 mammary tumour mouse	0.0005, 0.005, 0.050, 0.5 orally	PND 56-252		decreased tumour latency and increased tumour multiplicity
Weber Lozada and Keri (2011)	mouse	0.025, 0.250 by gavage	GD8-21	DMBA	reduction of tumour latency of mammary tumours
Ayyanan <i>et al.</i> , 2011	mouse	0.6 µg, 1.2 mg/kg-b.w./day	unclear		adjusted number of buds increased
Kass <i>et al.</i> , 2012	rat	0.7, 64 µg/kg b.w./day	GD9 until weaning in F0		In F1 on GD21 but not on day 18 delayed histological MG differentiation
Tharp <i>et al.</i> , 2012	rhesus monkeys	0.400 orally	GD 100-165		statistically significant difference in the number of mammary buds/ductal units
Vandenberg <i>et al.</i> , 2013	mice	0.25, 2.5, 25 or 250 µg/b.w./day via osmotic mini-pumps	GD8-PND16		advanced gland development at 0.25 and 2.5 µg/kg b.w. but not at higher doses

1

1 **General tumorigenicity**

2 In a study, carcinogenicity (including thyroid and lungs) was induced by N-nitrosobis-(2-
3 hydroxypropyl)-amine (BHP) (Takashima *et al.*, 2001) The effect of BPA exposure during
4 development in this model was investigated giving oral doses of 0 or 10,000 ppm (mg/kg
5 in feed) BPA for 10 weeks prior to mating, and through mating, gestation and lactation.
6 Intakes of BPA were reported to be about 400-600 mg/kg b.w./day. Beginning at 5
7 weeks of age and continuing for 12 weeks, offspring in each group received either tap
8 water or tap water containing 2000 ppm (mg/L) BHP. Dam body weight was lower in the
9 BPA group compared to the control group during the gestation period and at weaning.
10 Otherwise, BPA had no effect on food intake and maternal serum levels of
11 triiodothyronine, thyroxine, and thyroid-stimulating hormone, weights or
12 histopathological alterations of maternal organs, including uterus and ovary, on mating,
13 fertility, duration of gestation, live-born pups, implantation loss, or offspring viability
14 through PND 21. In pups from dams exposed to BPA compared to pups from control
15 dams, body weights were higher (by 11%) in females at 3 days of age and lower in
16 males and females at 10 days and 2 weeks of age (16–22% decreases in males and 12–
17 19% decreases in females). Prenatal and postnatal BPA exposure was not associated
18 with significant differences in the development of BHP-induced neoplasms in the offspring
19 (Takashima *et al.*, 2001). The results of this study indicate that oral exposure to 400-600
20 mg/kg b.w./day BPA during development does not exert promoting effects on BHP-
21 induced thyroid, lung, liver, thymus and esophagus carcinogenesis in rats.

22 Doses of 0, 0.05, 7.5, 30, and 120 mg BPA/kg b.w./day were administered by gavage to
23 female F344 rats during pregnancy and lactation (Ichihara *al.*, 2003). At 5 weeks of age,
24 21 male rats/group were injected subcutaneously with 50 mg/kg b.w./day 3,2-dimethyl-
25 4-aminobiphenyl (DMAB) 10 times at 2-week intervals. DMAB is an experimental
26 aromatic amine that serves as an experimental model for arylamine and heterocyclic
27 amine mutagens (Ravoori *et al.*, 2008). There were no consistent or dose-related effects
28 on multiple endpoints. Without DMBA treatment, incidences of prostatic intraepithelial
29 neoplasia (PIN), carcinoma, and atypical hyperplasia were not increased by exposure to
30 BPA, and there were no increases in tumours of the non-reproductive organs. No effect
31 was observed on serum testosterone levels. This screening study showed that exposure
32 of rat dams up to 120 mg/kg b.w./day BPA during the gestation and lactation periods did
33 not predispose their offspring to prostate cancer development later on in life (65 weeks
34 of age).

35 Effects of maternal exposure to BPA on uterine carcinogenesis were studied in offspring
36 of Donryu rats (a strain of rats with a high rate of spontaneous and ENNG-induced
37 uterine tumours) administered BPA (0, 0.006 and 6 mg/kg b.w./day, n = 12, 15 and
38 19/group respectively) daily by gavage from GD 2 to PND 21 (Yoshida *et al.*, 2004). At
39 11 weeks of age, 35-36 animals/group were injected in the uterine horn with N-ethyl-N'-
40 nitro-nitrosoguanidine (ENNG) to initiate uterine carcinogenesis. About 24 weeks later,
41 the uteri of the 24–30 surviving animals/group were examined histologically to detect
42 tumours and other lesions. In dams exposed to BPA, there were no clinical signs of
43 toxicity or effects on body weight, implantation sites, or gestation length and on litter
44 size. BPA exposure had no effect on the pups. The incidence of uterine preneoplastic or
45 neoplastic lesions induced by ENNG was not increased by BPA exposure.

46 **Prostate**

47 The effect of short-term neonatal exposure to BPA on susceptibility of Sprague Dawley
48 rats to prostate cancer was investigated after s.c. injection of BPA on PND 1, 3 and 5.
49 The dose administered was 10 µg/kg b.w. s.c. corresponding to 41.8 µg/kg b.w. by the
50 oral route that was based on AUCs after oral and s.c. administration allowing the
51 calculation of an oral systemic availability of 23.9% (Ho *et al.*, 2006). From PND 90, in
52 50% of the rats of every group 17β-estradiol (E) and testosterone (T) were administered
53 by s.c. implantation for 16 weeks in a dose which is reported to induce prostatic
54 intraepithelial neoplasia (PIN) in 33% of Sprague Dawley rats. The second half of rats
55 served as control. At 28 weeks, BPA exposure alone showed no effects on dorsal prostate

1 weight, histopathology alterations, proliferation index, or apoptotic index. In animals that
2 were given E and T simultaneously for 16 weeks from PND 90, the group of rats with BPA
3 exposure showed a statistically significant increased incidence and severity of PIN (100
4 [10/10] vs. 40% [4/10] incidence in controls). In the BPA/E+T group compared to the
5 E+T group, the proliferation index was increased and the apoptosis index was decreased
6 in regions where PIN was observed. Furthermore, the authors found hypomethylation of
7 the PDE4 gene and increased expression of that gene at 90 and 200 days of age, with or
8 without E+T exposure in adulthood.

9 A study by the same group (Prins *et al.*, 2011) used the identical protocol with the
10 modification that a group with oral dosing was included whereby s.c. and oral dosing was
11 at the same level, namely 10 µg/kg b.w.. Kinetic studies revealed an oral systemic
12 availability of 23.9 % of the dose. The study confirmed the findings of the earlier study.
13 Notably, identical effects were elicited by s.c. and oral dosing, although the internal dose
14 after oral dosing was about 25% of the s.c. dose. Thus, no dose-response relationship
15 could be demonstrated.

16 In a mechanistic study, the group of Prins (Tang *et al.*, 2012) evaluated methylation and
17 expression of several genes throughout life in the rat prostate gland by BPA given by s.c.
18 administration in three doses of 10 µg/kg b.w. (corresponding to 36 µg/kg each) each on
19 PND 1, 3, and 5 with a low (0.1 µg/kg b.w.) and a high (2500 µg/kg b.w.) dose of 17β-
20 estradiol-3-benzoate (EB) as controls. Furthermore, a group of the treated rats received
21 additional treatment, with estradiol (E) plus testosterone (T) released via a s.c.
22 implanted capsule to produce increased intraepithelial neoplasias in the prostate, a model
23 which has been used by the group since 1981 (Lee *et al.*, 1981). Further results were
24 obtained in prostate cell lines. A whole array of changes were observed *in vivo*:
25 hypomethylation of the promoter of nucleosom binding protein-1 persisting until day
26 100; hypermethylation of hippocalcin-like1 which shows changes throughout life;
27 persistent overexpression of four of eight genes functioning in methylation/demethylaton
28 of DNA not related to DNA methylation at their promoters. The results are somewhat
29 inconclusive because a) no dose dependency was observed for the treatment with EB the
30 dose differing by a factor of 25, 000 b) no clear difference existed in the parameters for
31 the group undergoing additional treatment with E+T and c) more than 50 statistical tests
32 were performed when testing the *in vivo* results. Although the authors claim that
33 Bonferroni *post hoc* test was performed to correct for multiple testing, it is uncertain to
34 which data it was applied.

35

36 **Mammary gland effects**

37 The effect of BPA was investigated in the N-nitroso- N-methylurea (NMU) model for
38 inducing mammary tumors in Wistar rats (Durando *et al.*, 2007). On gestational day
39 (GD) 8–23, s.c. (via miniature osmotic pumps) doses of 0 or 0.025 mg/kg b.w./day
40 (corresponding to 0.9 mg/kg b.w. day on the oral route) BPA were given. Offspring were
41 killed before puberty (PND 30), after puberty (PND 50), or in adulthood (PND 110 and
42 180). In mammary gland stroma and epithelium proliferation, apoptotic cells were
43 determined and morphometric analyses were performed using adequate methods. Part of
44 the offspring was examined for responsiveness towards the established carcinogen N-
45 nitroso-N-methylurea (NMU). On PND 50, NMU was administered *intraperitoneally* to 10–
46 16 offspring from the vehicle control group at 25 or 50 mg/kg b.w. and to 21 offspring
47 from the BPA group at 25 mg/kg b.w./day. Based on findings from a pilot study, 25
48 mg/kg b.w. NMU was considered a sub-carcinogenic dose and 50 mg/kg b.w. NMU was
49 considered a positive control.

50 Anogenital distance on PND 1 or 5 and postnatal body weights were unaffected in pups
51 exposed to BPA. Vaginal opening was 5 days earlier in pups exposed in intra-uterine life
52 to subcutaneous BPA (mean PND 34 to PND 39 in controls). On PND 50, the
53 BrdU/apoptosis ratio was significantly increased and apoptosis was significantly
54 decreased in mammary parenchyma and stroma of BPA-exposed animals; the effects

1 were not observed on PND 30 or PND 110. Significantly increased percentages of
2 hyperplastic ducts, density of stromal nuclei, and numbers of mast cells were observed in
3 the BPA group on PND 110 and PND 180. In rats exposed to 25 mg/kg b.w./day NMU on
4 PND 50, incidence of hyperplastic lesions on PND 180 was significantly higher in the
5 group with prenatal BPA exposure compared to controls (mean incidence of 35.5%
6 compared to 15.7% in controls). Other results were not statistically significant. As no
7 dose-response relationship was investigated, the results on the mammary gland cell
8 proliferation should be considered as supporting evidence and indicator for a possible
9 concern.

10 Murray *et al.* (2007) studied whether prenatal BPA exposure induced mammary tumours
11 in rats. Wistar-Furth rat dams were exposed via subcutaneously implanted osmotic
12 pumps to BPA 0, 0.0025, 0.025, 0.250, or 1 mg/kg b.w./day from GD 9 through PND 1.
13 Vehicle control exposure was 50% DMSO.

14 The number of hyperplastic ducts was increased in all dose groups on PND 50; the study
15 authors noted that the effect on PND 50 was quantitatively similar in all dose groups (i.e.
16 3–4-fold increase) lacking a dose-response. Some of the hyperplasias were classified as
17 carcinoma *in situ* with cribriform structures. These were observed in the 0.25
18 (corresponding to 9 mg/kg/d oral dosing) and 1 (corresponding to 35.7 mg/kg/d oral
19 dosing) mg/kg b.w./day groups. The incidence was 25% (1 out of 4) at PND50 and 33%
20 (2 out of 6) for the two highest dosed groups (0.25 and 1 mg/kg). The study authors
21 concluded that fetal BPA exposure at dose levels of 0.250 and 1 mg/kg b.w./day via
22 subcutaneously implanted minipumps (corresponding to oral doses of 9 mg/kg b.w./day
23 and 36 mg/kg b.w./day) is able to induce development of preneoplastic and neoplastic
24 mammary lesions in rats. There were some limitations to this study. Background diet,
25 drinking water, bedding, and cage provided “negligible” estrogenicity. The forming of
26 ductal end buds usually appears at puberty (Lucas *et al.*, 2007). Bud formation and
27 ductal hyperplasia might be seen as an adverse outcome or as part of the normal ductal
28 development depending on the status of the animals in terms of mammary gland
29 development. A positive control like estradiol, lacking in this study, is then needed for
30 comparison and identification of the adverse outcome. It is unclear whether these
31 findings are biologically related to carcinogenic hazard. However, the results show a
32 difference clearly induced by BPA and confirm earlier observations of this research group
33 for the possibility for an effect on the developing mammary gland (Durando *et al.*, 2007).

34 The same research group used the same exposure protocol (s.c. osmotic pumps, dosing
35 0.25, 2.5, 25 µg/kg b.w.) for long-term evaluation of mammary gland alterations in mice
36 (Vandenberg *et al.*, 2008). Mice were exposed from gestation day 8 until day 16 of
37 lactation. At 3, 9 and 12–15 months of age female offspring were killed and mammary
38 tissue samples collected and evaluated. An increase in the volume fraction of alveolar
39 buds in the mammary tissue was observed for the 0.25µg/kg b.w.. BPA group only, at
40 month 3 and 9. A dose-response relationship was not present. At 9 months, an increase
41 in the incidence of beaded ducts was also noted for all doses investigated, although a
42 dose-response relationship was not present. At month 12–15, the incidence of beaded
43 ducts was increased only for the lowest dose. Proliferation of the cells was indicated by
44 the Ki-67 antigen staining. Histological analysis of mammary glands at 9 months was
45 unremarkable as to periductal stroma width, periductal collagen density, proliferative
46 index (Ki-67 staining) and %ER and %AR positive cells.

47 BPA exposure during pregnancy and lactation affected the development of the mammary
48 glands in the exposed female offspring. It is unclear whether these findings are
49 biologically related to a carcinogenic hazard. No dose-response was observed, and the
50 authors interpreted the results as indicating non-monotonicity.

51 In a study by Moral *et al.* (2008) pregnant rats were given 25 µg BPA/kg b.w. or 250 µg
52 BPA/kg b.w. from GD 10 to GD21. Female litters were euthanized at 21, 35, 50, and 100
53 days. Analysis of mammary gland morphology was performed from whole-mounted
54 mammary tissue. Proliferative index was determined by quantifying bromodeoxyuridine
55 incorporation in the epithelial cells. BPA exposure induced changes in the mammary

1 gland that were time and dose specific. High-dose exposure resulted in increased number
2 of undifferentiated epithelial structures of the breast tissue. Proliferative index did not
3 show an effect of BPA. The study results are well described. However, it remains unclear
4 what the findings indicate.

5 Neonatal/prepubertal rats were exposed to BPA via lactation from nursing dams treated
6 orally with 0, 25, and 250 µg BPA/kg body weight/day from PND 1 to PND 21 (Jenkins *et*
7 *al.*, 2009). In addition, female offspring were exposed to 30 mg DMBA/kg body weight at
8 50 days of age. Lactational BPA exposure resulted in increased cell proliferation and
9 decreased apoptosis at 50 but not 21 days PND. This means that no effect was seen at
10 the end of exposure. When additional DMBA treatment has been performed, lactational
11 exposure to BPA demonstrated a dose-dependent increase in mammary tumor
12 multiplicity and reduced tumor latency. The effect of DMBA is similar to that seen in other
13 studies. It is, however, not clear whether the findings indicate a carcinogenic hazard.

14 A similar protocol was used in the study of Betancourt *et al.*, 2010. Oral treatment with
15 0, 25 or 250 µg BPA/kg b.w. was given to pregnant rats from GD 10 to GD21. For
16 tumorigenesis experiments, prenatally exposed female offspring received a single dose of
17 30 mg/kg b.w. DMBA by gavage on PND 50, or PND 100. Prenatal exposure of the dam
18 to 250 µg BPA/kg b.w. increased cell proliferation. Prenatal exposure of the dam to 250
19 µg BPA/kg b.w. combined with a single exposure of female offspring to DMBA had an
20 effect only when dosed on PND 100, but not when dosed on PND 50. In those animals,
21 tumor incidence increased significantly and tumor latency was decreased in comparison
22 to the control group. The effect of DMBA is similar as seen in other studies. It is,
23 however, not clear whether the findings indicate a carcinogenic hazard.

24 Three studies originating from the research group of Soto *et al.* demonstrated an effect
25 of prenatal BPA exposure on mammary gland development, i.e. ductal hyperplasia and in
26 one study carcinoma in situ development. These studies were performed with very low
27 background estrogen levels in the feed which may have had an effect on the normal
28 development in the controls. A limitation is the lacking of a positive control like estradiol
29 for comparing the estrogenic effects induced by BPA. However, the differences between
30 the non-treated and prenatal/postnatal BPA exposed animals are clear, so it cannot be
31 excluded that BPA affects early development of mammary tissue. Therefore, these
32 studies should be considered as an indicator for a possible concern.

33 Recently, Ayyanan *et al.* (2011) also showed that perinatal exposure of mice to BPA at
34 doses ranging from 1.2 µg to 1.2 mg BPA/kg b.w./day and DES at 0.12 and 1.2 µg/kg
35 b.w./day via drinking water. Exposure to low doses of oral BPA had no significant effect
36 on litter size, sex ratio, or body weight at weaning. The number of terminal end buds,
37 estrogen-induced proliferative structures, was altered in a dose-dependent fashion, but
38 for only one dose (3 µg/kg b.w./day), an increase was suggested. In addition, adult F1
39 females showed an increase in mammary epithelial cell numbers at three months of age
40 for both BPA (low 6-12 µg/kg and high 600-1200 µg/kg intake) and DES exposed F1
41 females. However, the study reported effects on increasing adjusted number of buds at a
42 dose of 0.6 µg/kg b.w./day. As the paper does not clearly describe the procedure how
43 the number of buds was adjusted and because the dose is really unclear (differences
44 between method section and results section differ up to a factor of 1000), the study
45 cannot be considered valid.

46
47 More recently, Tharp *et al.* (2012) of the group of Soto, investigated the histopathology
48 of mammary gland in the offspring of rhesus monkeys given orally 400 µg of BPA per kg
49 of body weight daily from gestational day 100 to term. This regimen resulted in $0.68 \pm$
50 0.312 ng/mL of free BPA and 39.09 ± 15.71 ng/mL of conjugated BPA in serum
51 measured after dosing with deuterated BPA. The serum concentration is about 250 times
52 higher than the predicted concentration in humans at a high realistic dose of 1 µg/kg
53 b.w./day by the oral route. Morphometric analysis of the mammary glands removed from
54 female offspring at birth showed that only the density of mammary buds was significantly
55 increased in BPA exposed monkeys. Other parameters like total area, ductal area,

1 number of ducts, and terminal ends showed no difference between BPA exposed and
2 control animals. In general the development of their mammary gland seemed more
3 advanced when compared to unexposed monkeys.

4 BPA induced proliferative changes in the mammary gland of male CD-1 mice when BPA
5 was given to pregnant and lactating mice at doses of 0.25, 2.5, 25 or 250 µg/b.w./day
6 via osmotic mini-pumps (Vandenberg *et al.*, 2013). In this study, mammary glands were
7 examined at 3-4, 7-9 and 12-16 months in the adult male offspring. The reported
8 changes were seen in the ductal area and at branching points. Animals exposed to 0.25
9 or 2.5 µg/kg b.w./day showed more advanced gland development than the controls,
10 whereas animals having dosed with 25 or 250 µg/kg b.w./day had no statistically
11 different results compared with controls. These results point at a non- monotonic dose-
12 response to BPA. At later time periods, effects were similar. However, the dose-response
13 relationship had a different pattern.

14 Jones *et al.* (2010) used the Brca1 knockout mouse model of breast cancer susceptibility
15 (gene 1 (BRCA1) related mammary cancer). Continuous exposure to 250 ng/kg b.w. BPA
16 through an osmotic pump for 4 weeks (corresponding to 125 µg/kg b.w./day by the oral
17 route) increased mammary epithelial cell proliferation and hyperplasia in adult Brca1
18 knockout mouse mammary glands compared with wild type mice. The authors also
19 presented *in vitro* mechanistic investigations in MCF-7 cells supporting the hypothesis
20 that loss of BRCA1 function in mammary cells would enhance BPA-induced cell
21 proliferation via interference with the ER-alpha signalling pathway.

22 Jenkins *et al.* (2011) investigated in a transgenic MMTV-erbB2 mammary tumour mouse
23 model, whether BPA increased the susceptibility of females to mammary cancer after
24 chronic oral exposure to BPA at levels of 0, 2.5, 25, 250, 2500 µg BPA/L in drinking
25 water for the whole adult life (PND 56-252). In this model, BPA decreased tumour
26 latency and increased tumour multiplicity, enhanced tumour volume and higher incidence
27 of lung metastasis in a way that the authors describe a non-monotonic dose-response as
28 the effects were observed at one of the two lower doses (0.5 and/or 5 µg BPA/kg
29 b.w./day), but not at 50 or 500 µg BPA/kg b.w./day. In contrast, the cell proliferation
30 index of mammary epithelial cells (evaluated on PND 112) and the apoptotic index
31 increased in a dose-dependent manner, with statistical significant results at the highest
32 dose (500 µg BPA/kg b.w./day).

33 Similar to the study of Ichihara *et al.*, 2003, Weber Lozada and Keri (2011) used the DMBA
34 mammary tumour mouse model to assess the effects of foetal exposure to BPA on
35 mammary tumour development in adults. When mice were exposed *in utero* to 25 µg/kg
36 b.w. and 250 µg/kg b.w. by oral gavage of the pregnant dams, the offspring showed an
37 increased susceptibility to DMBA mammary gland induction when treated with DMBA
38 postnatally. A dose-response in the reduction of tumour latency of mammary tumours
39 was observed in mice treated with BPA before birth. The foetal exposure to BPA led to
40 early vaginal opening in FVB/N female mice. In these studies, the mouse strain FVB/N
41 was used because of its intrinsic propensity to develop mammary tumors with various
42 genetic manipulations. The administration of BPA only had no effect on mammary gland
43 development. BPA was administered from postcoital day 8 until birth, while DMBA was
44 administered twice one dose each at week 5 and 6 after birth. Additionally, tumour
45 growth promotion was observed for both BPA and 17β-oestradiol treated mice after
46 injection of estrogen dependent MCF-7 human breast cancer cells in ovariectomized nude
47 mice. However, the effect of BPA was reduced when compared to 17β-oestradiol.

48

49 Kass *et al.* (2012) found in F1 bred female offspring of BPA and DES treated dams a
50 delay in histological mammary gland differentiation and altered milk yield pattern during
51 lactation. BPA with theoretical doses of 0.5 µg BPA/kg b.w./day and 50 µg BPA/kg
52 b.w./day was administered via the drinking water from GD9 until PND21. Direct exposure
53 to BPA or DES in the drinking water did not produce signs of embryotoxicity (i.e. all
54 pregnant dams successfully delivered their pups, and the number of live-born pups per
55 litter was similar among groups), abnormal maternal or nursing behavior, or changes in

1 body weight gain in the F0 dams. The reproductive parameters were not significantly
2 changed in the F1 females, with the exception of the number of resorption sites in BPA
3 50 µg/kg b.w. and DES treated dams. The number of pups born of the F1 females was
4 decreased but did not reach significance.

6 **Leydig cell division**

7 In a study in which pregnant and lactating Long-Evans rats were given BPA via gavage
8 (2.5 and 25 µg/kg b.w./day) from gestational day 12 to postpartum day 21, Leydig cell
9 division was stimulated in the prepubertal period and increased Leydig cell numbers were
10 shown in the testes of adult male rats at 90 days (Nanjappa *et al.*, 2012).

12 **Conclusion on BPA carcinogenicity**

13 From all the study results taken together, it can be concluded that in standard
14 carcinogenic testing protocols according to OECD, BPA has no carcinogenic activity. In
15 additional in multigeneration studies, (Tyl *et al.*, 2002; Tyl *et al.*, 2008) no indication of
16 increased cancerogenicity was observed; in particular, preneoplastic lesion of the
17 mammary gland were absent in all offspring. In contrast, several studies in rats, using
18 s.c. exposure via osmotic pumps, demonstrated an effect of prenatal BPA exposure on
19 mammary gland development, i.e. ductal hyperplasia, and in one study carcinoma
20 development in situ. These studies were performed with very low background estrogen
21 levels in the feed which may have had an effect on the normal development in the
22 controls. A limitation is the lack of a positive control like estradiol for comparing the
23 estrogenic effects induced by BPA. Similar effects were indicated in studies in mice and
24 rhesus monkeys, supporting the observations in rats. The differences observed between
25 the non-treated and prenatal/postnatal BPA exposed animals is clear, so this effect
26 cannot be excluded. These studies should be considered as an indicator for a possible
27 concern, although the relevance for humans is not clear.

28 Studies using s.c. administration of BPA indicated that BPA may have the ability to
29 increase the effects of well-known carcinogens even at very low BPA levels, acting as
30 promotor. The studies had limitations which render them unsuitable to assess whether
31 BPA has such an effect following prenatal or peri-natal exposure. The main limitation is
32 that in the studies with positive outcome additional treatment with a strong initiating or
33 additional promoting agent(s) has been performed. Furthermore, in most of the studies
34 multiple statistical testing has been performed without proper adjustment to avoid
35 positive results by chance. An additional problem in the statistical analysis is the lack of
36 considering litter effects.

37 Further studies were performed in transgenic animals, the results of which cannot be
38 extrapolated directly to the human situation.

39 In conclusion, the studies indicating effects on mammary gland development raise some
40 concern for a possible effect after prenatal exposure to BPA. However, the existing
41 studies performed according to OECD guidelines do not show a carcinogenic effect of
42 BPA.

44 **3.9.4. Neurotoxicity and behavioural toxicity**

45 Neurological studies in laboratory animals (rat, mouse, sheep and/or non-human
46 primate) assayed pathology, neurochemistry, neuroendocrine system, sensory systems,
47 locomotor and spontaneous activity, social and sexual behaviours, anxiety, and learning
48 and memory at various stages of development. Exposure was primarily during the
49 periods of gestation and lactation.

50 The experimental evidence does not support brain developmental neuropathological
51 changes (e.g. cortical thickness, cerebellum height, height of hippocampal layers) at rat

1 maternal dietary exposures below 164 mg/kg b.w./day (Stump *et al.*, 2010). Brain
2 biochemical changes (e.g. monoaminergic, cholinergic, glutamatergic, nuclear receptor
3 expression and signalling) were reported in rodents at dietary exposures below 5 mg/kg
4 b.w./day. However, no additional functional testing was performed. Thus, the *in vivo*
5 consequences of the changes are unclear.

6 Only a few studies have specifically focused on the impact of BPA on morphometric and
7 cellular brain sex differences. Depending on the hypothesized mode of action, not all
8 studies included both sexes. In some cases, only one sex was impacted, whereas in
9 others, the overall differences between the sexes were reduced or eliminated. The
10 controversial results limit their interpretation (reviewed in Wolstenholme *et al.* 2011,).

11 BPA does not appear to affect sensory systems, spontaneous activity or female sexual
12 behaviour in rodents. For neonatal reflexes, sensory response, spontaneous motor
13 activity and other open field behaviours, a minimum NOAEL of 164 mg/kg b.w./day for
14 rat maternal dietary exposure can be identified. Minimum NOAELs (corresponding to the
15 highest dose tested in individual studies) of 200 µg/kg b.w. per day (Ryan *et al.*, 2010)
16 and 320 mg/kg b.w./day (Kwon *et al.*, 2000) for rodent maternal dietary exposure could
17 be identified for lordosis; for other components of sexual/sociosexual behaviours,
18 NOAELs could not be identified. For learning and memory in rodents, conflicting data
19 exist, although the weight of evidence does not suggest these to be a concerning hazard
20 identification endpoint (Kwon *et al.*, 2000).

21 Neuroendocrine data in rodents and sheep suggest effects on female hypothalamic-
22 pituitary-gonadal (HPG) axis organization (≥ 50 µg/kg b.w. per day, non-oral route) and
23 function (≥ 5 mg/kg b.w./day, non-oral route), that is at doses higher than the Point of
24 Departure used for TDI derivation (Kato *et al.*, 2004). The specific mechanisms by
25 which this occurs remain to be identified, but some data suggest that the pattern of
26 luteinizing hormone release may be altered by exposure, resulting in blunted secretion
27 and resistance to feedback.

28 Recent studies (Ishido *et al.*, 2011; Kim *et al.*, 2011; Wolstenholme *et al.*, 2011; Eilam-
29 Stock *et al.*, 2012) have examined the effects of BPA at doses lower than 50 µg/kg b.w..
30 The endpoints were neuroanatomical/genomic and behavioural.

31 The study by Wolstenholme *et al.*, 2011 investigated the effect of dietary exposure
32 towards BPA (5 µg/kg b.w./day) on social interactions in the pups and also some gene
33 expressions. The female offspring showed increased social interactions in a free 30-min
34 social interaction test. However, BPA did not affect social preference for the stimulus
35 animal in a social preference test. In the Plus Maze task, anxiety, time spent in the open
36 arms, closed arms and the number of crosses between arms were similar in the two
37 groups. Gene expression analysis revealed that mRNA for the glutamate transporter
38 Slc1a1 was enhanced by exposure to BPA in female brains and that expression of two of
39 the three DNA methyltransferase genes, Dnmt1 and Dnmt3a, was modulated by BPA.
40 Whereas expression of estrogen receptors' genes was not affected by BPA, oxytocin
41 receptor gene was to some extent reduced in males. Although the association of the
42 behavioural results at weaning age with the small changes in gene expression found at
43 the fetal stage is weak, and do not fully support novel mechanistic hypotheses, these
44 findings confirm previous data on the sex-dimorphic effects of BPA on social behaviour.

45 The effects of a single subcutaneous BPA administration (40 µg/kg b.w.) on memory and
46 synaptic plasticity in adult male rats was examined by Eilam-Stock *et al.* (2012) in adult
47 animals. Single subcutaneous administration of BPA interferes with memory consolidation
48 possibly impairing the formation of dendritic spines by reducing a marker of neural
49 plasticity and synaptic remodeling as PSD95 in the hippocampus. This study is
50 remarkable as a single dose is sufficient to produce marked effects. However, notably, in
51 rats 40 and 80 µg/kg b.w. given s.c. corresponds to roughly 1 and 2 mg/kg b.w. oral
52 dosing, considering kinetic differences.

53 The study of Jones and Watson (2012) investigated the behaviour in the Morris Water
54 Maze (MWM), Elevated Plus Maze (EPM) and Forced Swimming Test (FST) after oral

1 administration of BPA in doses between 5 µg/kg b.w./day and 5000 µg/kg b.w./day
2 during gestation until PND 14 day to investigate their effects after delivery. No effect of
3 BPA was observed in the MWM, but on both the EPM and FST, low and high doses (5
4 µg/kg and 5000 µg/kg b.w./day) of BPA eliminated sex differences found between
5 controls. However, interpretation of the result is difficult and might be due to statistical
6 noise.

7 Three doses of 50 µg/kg b.w. and 50 mg/kg b.w. BPA each by subcutaneous injection
8 (corresponding to an oral dose higher than 1 mg/kg b.w.) from PND0 to PND2 showed
9 significant and sex-specific alterations of gene expression of estrogen receptor alpha
10 (ERα), ER beta (ERβ) and kisspeptin (Kiss1) in the anterior and mediobasal
11 hypothalamus on PND 4 and 10 of rats but not in other regions of the brain (Cao *et al.*,
12 2012). The authors suggest that effects observed with BPA are very different from those
13 of the positive control (oestradiol) and hence mechanisms were involved which are
14 different from estrogenic action.

15 BPA induced locomotor hyperactivity when administered *intracisternally* at PND 5 in the
16 brain of male rats (Ishido *et al.*, 2004). A difference noted was that control animals
17 received the vehicle olive oil only, while BPA treated rats received BPA dissolved in at
18 least 50% ethanol complemented with olive oil. There was a dose dependent effect on
19 the motor activity with a NOAEL of 0.02 µg/pup and a LOAEL of 0.2 µg/pup, both
20 administered as a single dose. The same group reported similar results for BPA in
21 another study (Masuo *et al.*, 2004). In an additional study only one dose was
22 investigated (20 µg/pup) and BPA was compared with two of its derivatives (3-
23 hydroxybisphenol A, bisphenol A 3,4-quinone). With the same treatment modality
24 (ethanol and olive oil), the derivatives did not induce a motor hyper activity whereas BPA
25 did. So, the effects could not be attributed to the ethanol present in the administered
26 solution (Ishido *et al.*, 2011). The same protocol was applied in a study by Kiguchi *et al.*,
27 (2008) and the results the authors report are similar to the previous studies with the
28 exception that the motor hyperactivity was observed in the light phase in contrast to the
29 studies of Ishido *et al.*, 2004, and Masuo *et al.*, 2004, in which the hyperactivity was
30 observed in the dark phase of the day. When comparing doses in the study of Kiguchi a
31 higher dose was needed to induce the effect (40 µg versus 0.2 µg and 20 µg/pup), the
32 20 µg dose being ineffective (Kiguchi *et al.*, 2008). The effect seems to be limited to a
33 period directly after the administration, as at week 8-10 after the treatment no effect of
34 the BPA administration on motor hyperactivity was observed (Kiguchi *et al.*, 2007).

35 There are several studies published in the last three years investigating the effect of BPA
36 in animal models for anxiety, for learning and memory, and for social behaviour.

37 Anxiety

38 Concerning anxiety, there exist a number of studies in rodents (e.g. Cox *et al.*, 2010;
39 Tian *et al.*, 2010; Zhang *et al.*, 2009; Patisaul and Bateman, 2008; Ryan and
40 Vanderbergh, 2006; Gioiosa *et al.*, 2007; Fujimoto *et al.*, 2006). However, the results of
41 these studies were controversial with either significant or not significant sex differences,
42 which might be partly explained by the testing conditions used which were different in
43 the studies and may have not exposed the animals in the window of susceptibility. The
44 most recent studies (Matsuda *et al.*, 2012; Jones and Watson, 2012; Patisaul *et al.*,
45 2012; Jasarevic *et al.*, 2012; Xu *et al.*, 2012; Gioiosa *et al.*, 2013; Kundakovic *et al.*,
46 2013) assessed the effects of BPA on anxiety-like behaviour and brain biochemistry. The
47 studies explored different exposure schedules and different doses.

48 Matsuda *et al.*, 2012 showed that only in male offspring and not in females of C57BL/6J
49 mice dosed from GD10 to PND20 to BPA (0.25 µg/kg b.w./day subcutaneously) assessed
50 at 4 weeks and at 8 weeks exhibited increased anxiety and dopamine concentrations and
51 turnover in different brain areas were altered. In the rat study of Jones and Watson
52 (2012) anxiety responses (Elevated Plus Maze (EPM); Forced Swimming Test (FST)) were
53 measured after repeated oral exposure between GD 1 and PND 21 to BPA doses 5, 50,
54 500, or 5000 µg/kg b.w./day. Males showed greater anxiety-like behaviour than females

1 in the EPM and the lowest and the highest dose of BPA eliminated significant sex
2 differences. In the FST test only for the lowest BPA dose eliminated sex differences. They
3 also assessed spatial learning capacities in the Morris Water Maze and reported no effects
4 of BPA or an interaction of BPA with sex. This study is reported in a way which excludes
5 evaluation of the extent of the overall BPA effect. In contrast, Wolstenhome *et al.* (2011)
6 did not find effects on anxiety in the Elevated Plus maze following oral administration of
7 BPA.

8 In outbred deer mice (*Peromyscus maniculatus bairdii*) (Jasarevic *et al.* 2012), BPA at
9 doses of 50 mg, and 5 mg kg feed weight showed increased anxiety in the Elevated Plus
10 Maze and reduced exploratory behaviours in male offspring whose dams were fed with a
11 diet supplemented with either ethinyl estradiol or BPA (50 mg, 5 mg, or 50 µg/kg feed
12 weight) starting from 2 weeks before mating up to the end of the lactation period. The
13 drawback of the study is that food consumption was not measured, and, therefore, the
14 BPA doses were calculated by a formula were imprecise.

15 Patisaul *et al.* (2012) exposed Wistar rats via drinking water (1 mg/L) in the intrauterine
16 and postnatal period (GD 6 through PND 40) to BPA (estimated dose of BPA between 100
17 and 1000 µg/kg b.w./day). BPA-exposed animals showed increased anxiety as juveniles,
18 and as adults displayed a disappearance of the normal sexual dimorphism in exploratory
19 behavior. Down-regulation of expression of ERβ in the amygdale was reported, a key
20 area in modulation of affective responses. Administration of a soy-enriched diet appeared
21 to mitigate the BPA effects.

22 Xu *et al.* (2012) explored in mice the effects of different exposure windows (GD 7-20 or
23 PND 1-14) with BPA (0.4 or 4 mg/kg b.w./day) by oral route. Both exposure periods and
24 both doses increased anxiety- and depression-like behaviours in mice of both sexes
25 measured by EPM, Open Field, dark light transition task and mirrored maze. The
26 gestational exposure exhibited a stronger effect on anxiety-like state only in females.
27 AMPA GluR1 receptor subunit was inhibited in hippocampus and amygdala in both sexes.

28 Gioiosa *et al.* (2013) exposed mouse dams from GD 11 to PND 8 with an oral low-dose of
29 BPA (10 µg/kg b.w./day). After birth, offspring of exposed mothers were cross-fostered
30 by mothers not exposed, whereas offspring from not-exposed mothers were nursed by
31 exposed mothers. The exposed F1 animals were tested in EPM, open-field and novelty
32 test to measure anxiety and emotional response to novelty. There were sex differences in
33 the control group: control females were less anxious, more active and more prone to
34 explore a novel environment than control males. Females exposed to BPA pre- and
35 postnatally showed evidence of increased anxiety and were less prone to explore a novel
36 environment relative to the control females, showing a behavioural profile more similar
37 to control males than females. In this study, the direction of the behavioural changes
38 was consistent and affected similarly by the pre- and postnatal exposures, although with
39 a greater effect associated with postnatal exposure only in females. The study has
40 limitations due to incomplete statistical considerations, as no adjustment of the p-value
41 ($p < 0.05$) was made for multiple testing, although 15 endpoints were evaluated with six
42 comparisons per endpoint. In addition, the authors investigated only one dose level of
43 BPA. Thus, the results cannot be used for risk assessment.

44 In the study of Kundakovic *et al.* (2013), BALB/c mice were exposed from the day of
45 mating to the end of pregnancy to BPA (2, 20 or 200 µg/kg b.w./day). Whole arrays of
46 endpoints were evaluated. Six behavioural endpoints, including anxiety-like behaviour,
47 were assessed and expression of five genes at two locations in the brain as well as DNA
48 methylation at eleven loci and two brain regions were measured. The results showed that
49 maternal exposure during pregnancy induces sex-specific, dose-dependent (linear and
50 curvilinear), and brain region- specific changes in expression of genes encoding estrogen
51 receptors (ERs; ERα, ERβ, ERγ) and altered mRNA levels of epigenetic regulators DNA
52 methyltransferase (DNMT) 1 and DNMT3A in the juvenile cortex and hypothalamus,
53 paralleling changes in estrogen-related receptors. At the behavioural level BPA exposure
54 induced persistent, largely sex-specific effects on social and anxiety-like behaviour,
55 leading to disruption of sexually dimorphic behaviours in adult mice. The results may

1 only be seen as generating a hypothesis, as the statistical model is a not-prespecified
2 exploratory model.

3 Most of the studies, with the exception of the study of Kundakovic *et al.* (2013) that
4 found decreased anxiety in males, reported increased anxiety, mainly in males but
5 occasionally also in females following *in utero* exposure and exposure during lactation.
6 The doses of BPA were lower than 5 mg/kg b.w./day.

7 Effects on learning and memory

8 In previous studies (Xu *et al.*, 2010; Tian *et al.*, 2010; Carr *et al.*, 2003), developmental
9 exposure to BPA seemed to interfere with learning and memory capacities in different
10 learning tasks in rodents. However, the studies were not considered valid for risk
11 assessment due to methodological shortcomings. In addition, in the study by Stump *et*
12 *al.* (2010, see description of tests applied and results above), the authors did not report
13 any effects on learning and memory.

14 In the study by Xu *et al.* (2013), adult mice were exposed to oral doses of BPA (0.4, 4,
15 or 40 mg/kg b.w./day) for 12 weeks. Mice were assessed at the end of treatment in two
16 learning tasks, the Morris Water Maze and the Passive Avoidance test. BPA (0.4 or 40
17 mg/kg/day) extended the average escape path length to the hidden platform in Morris
18 Water Maze task and shortened the step-down latency 24 h after footshock of the males,
19 but no changes were found in females. BPA reduced numeric synaptic density and an
20 enlarged synaptic cleft and reduced length of active zone and PSD thickness, in the
21 hippocampus of male mice. Western blot analyses further indicated that BPA down-
22 regulated expressions of synaptic proteins (synapsin I and PSD-95) and synaptic NMDA
23 receptor subunit NR1 and AMPA receptor subunit GluR1 in the hippocampus of the males.

24 Eilam-Stock *et al.*, 2012 investigated the effects of a single subcutaneous BPA injection
25 (40 µg/kg b.w.) on memory and synaptic plasticity in adult male rats. Memory tests
26 applied included the Object Recognition (OR) and the Object Placement (OP) tasks. The
27 authors reported that BPA significantly impaired both OR and OP and decreased spine
28 density in the hippocampus and medial prefrontal cortex. Additionally, BPA significantly
29 decreased PSD-95, a measure of neural plasticity in the hippocampus and increased
30 pCREB, a transcription factor, in the prefrontal cortex. Together, these findings show that
31 BPA may block the formation of new memories by interfering with neural plasticity
32 processes in the adult brain. The Panel noted that the study was performed in adult
33 animals, limiting its value in assessment of developmental neurotoxicity.

34 The study by Inagaki and coworkers (2012), performed mainly in adult ovariectomised
35 (OVX) female 0 rats (to abolish any estrogenic modulation of behaviour) administered
36 with BPA at levels from 0.4 µg/kg b.w. to 400 µg/kg b.w. (6 does levels) by
37 subcutaneous route, found that BPA did not impair memory response *per se* in either OR
38 and OP memory task, but it significantly antagonized the effects of 17β estradiol as
39 enhancer of learning and memory performances and dendritic spine formation (lowest
40 dose of BPA effective in blocking the facilitatory effect of estradiol in OP test equal to 4
41 µg/kg b.w.; in OR test equal to 40 µg/kg b.w.). A group of normally cycling rats were
42 also used and exposed to a single dose level of 40 µg/kg b.w.: while BPA did not affect
43 OP performance at any phase of the estrous cycle, OR memory was inhibited by BPA only
44 on proestrous when endogenous E2 levels are at the highest.

45 These two studies, though exploring the effects of a single administration of BPA in adult
46 animals, added some mechanistic information to explain the effects reported for
47 developmental BPA on learning and memory processes and synaptogenesis, which could
48 implicate the interference of BPA with steroid-modulated synaptogenesis occurring during
49 brain ontogenesis in physiological conditions (see the review by Hajszan and Leranthy,
50 2010).

51 Studies with exposure during pregnancy

1 Jones and Watson (2012) failed to evidence any effects of oral gavage of BPA (doses 5,
2 50, 500, and 5000 µg/kg b.w./day) during gestation and lactation on spatial learning in
3 the Morris Water Maze.

4 On the contrary, Jasarevic *et al.* (2012) reported that male deer mice orally exposed
5 during gestation and lactation to 0.05, 5 or 50 mg/kg feed weight BPA equivalent to
6 0.25, 25 or 250 µg/kg b.w./day had impaired learning performance in the Barnes Maze,
7 while females outperformed males.

8 Finally, Ferguson *et al.* (2012) in their robust study using two very low doses of BPA (2.5
9 or 25 µg/kg b.w./day) given by oral gavage on gestational days 6-21 and then to
10 offspring from birth to weaning did not show significant effects on spatial learning.

11 There are several papers presenting evidence indicating effects of BPA exposure during
12 development on social responses, including social/affiliative interactions in female
13 rodents, sexual behaviour and aggression in males (Xu *et al.*, 2011; Jones *et al.*, 2011 ;
14 Cox *et al.*, 2010; Tian *et al.*, 2010; Palanza *et al.*, 2008; Patisaul and Bateman, 2008;
15 Giosa *et al.*, 2007). Overall, the direction of the effects ranged from pro-social effects to
16 reduction of social motivation. Although most of these studies have been reviewed by
17 EFSA in 2010, the social behaviour endpoint was not addressed separately in the EFSA
18 2010 opinion.

19 In the 2011 study by Wolstenholme *et al.*, the female offspring born to females fed with
20 a BPA-supplemented diet during pregnancy (about 1.25 mg BPA/kg diet estimated to be
21 equivalent to approximately 120 µg/kg b.w./day) showed slightly increased social
22 interactions in a free 30-min social interaction test. The effect on males was in the same
23 direction, but less significant. However, BPA did not affect social preference for a
24 stimulus animal when compared to an inanimate object. Gene expression analysis
25 performed in whole-brain embryos revealed mRNA for the glutamate transporter Slc1a1
26 was enhanced by exposure to BPA in female brains and that expression of two of the
27 three DNA methyltransferase genes, Dnmt1 and Dnmt3a, was modulated by BPA.
28 Notably, expression of estrogen receptor genes was not affected by BPA, but oxytocin
29 receptor gene (highly responsive to estrogen modulation and involved in social
30 behaviour) was reduced in males.

31 In a second study assessing transgenerational effects of BPA in mice through four
32 generations, Wolstenholme *et al.* (2012) exposed the F0 generation only to BPA (about 5
33 mg/kg diet, equivalent to approximately 1.0 mg/kg b.w./day²¹) through pregnancy and
34 lactation. Subsequent generations were not exposed to BPA. Brains from embryos from
35 mothers exposed to BPA had lower gene transcript levels for several estrogen receptors,
36 oxytocin, and vasopressin as compared with controls in the F1 generation; decreased
37 vasopressin mRNA persisted into the F4 generation, at which time oxytocin was also
38 reduced but only in males. Changes in gene expression were paralleled by alterations in
39 social behaviour in F1 and in F2 and F4. The effects were in the direction of slightly
40 reduced social interaction in F1 and increased social interaction in either F2 and F4.

41 The CEF panel noted that these two studies have some methodological limitations (only
42 one dose level used, litter effect not properly controlled). However, the extent of the
43 effects on F1 in the two studies is comparable although possibly in two opposite
44 directions (considering that different BPA dosages were used). The different direction of
45 effects in F2 and F4 was an unexpected result and might suggest inconsistency, but
46 transgenerational effects might result from modulation of several genes implicated in the
47 control of complex functional endpoints.

48 Effects on sensory-motor functions

49 In previous studies, no convincing evidence of a consistent BPA-related effect on motor
50 activity was demonstrated at low oral doses (Stump, 2010).

51 Newer studies on changes in sensory-motor function following pre- and post-natal
52 exposure were published by Ferguson *et al.* (2012) and Viberg *et al.* (2011).

1 Ferguson *et al.*, 2012 studied in rats the effect of exposure towards 2.5 and 25 µg/kg
2 b.w. daily from GD 6 to 21 and PND 1 to 21. Whereas in positive controls (5 and 10
3 µg/kg b.w./day EE), clear effects were seen in open field assessments and the Barnes
4 maze escape box, few consistent or dose-related effects resulted from developmental
5 treatment with BPA at the doses tested.

6 Viberg *et al.* (2011) showed that there were significant alterations in behavior and
7 cognitive functions in mice after two months and after five months, for the locomotion,
8 rearing, and total activity variables after a single oral administration of 3.3 or 4.8 mg/kg
9 b.w. BPA but not of 0.23 mg/kg b.w. on PND 10.

10

11 Studies with endpoints in brain biochemistry, neurogenesis, neuroanatomy and gene
12 expression (ex vivo studies)

13 The study by Cao *et al.*, 2012 shows that 50µg/kg b.w. BPA by subcutaneous injection
14 daily from postnatal day 0 (PND 0) to PND 2 had regional and sex-specific alterations of
15 gene expression of estrogen receptor alpha (ERα), ER beta (ERβ) and kisspeptin (Kiss1)
16 that are all decreased in the anterior and mediobasal hypothalamus on PND 4 and 10.
17 Notably, the effects of BPA are very different from those of estradiol (positive control),
18 supporting the view that the interference of BPA with early hypothalamic organization
19 involves mechanisms different from its estrogenic action. A more recent study by Cao *et al.*
20 *et al.* (2013) found that offspring of rats receiving BPA orally from gestational day 6 to PND
21 21 (2.5 or 25 µg/kg b.w.) show significant changes in estrogen receptors ESR1 and ESR2
22 in hypothalamus and amygdale at birth. Specifically, both doses of BPA increased
23 expression of ESRs in both sexes comparably to 5 or 10 µg/kg b.w. ethinyl estradiol.

24 The study by He, Paule and Ferguson (2012) indicates that BPA can have sex-specific
25 effects on hypothalamic medial preoptic area volume and that these effects manifest as
26 larger volumes in males, with oral exposure during pregnancy and by gavage to the pups
27 during the period of lactation at doses of 2.5 or 25 µg/kg b.w.. These alterations in rats
28 have been linked to changes in sexual dimorphic behaviour. The consequences of these
29 morphological changes if replicated in humans are not known, but the medial preoptic
30 area has a pivotal role in the regulation of sexual and parental behaviour in mammals
31 including primates.

32 Two studies addressed the controversial issue of BPA effects on hippocampal
33 neurogenesis (considered as a clear adverse effect by the 2013 ANSES report). Kim *et al.*
34 (2011) found increased neurogenesis after treating mice by oral gavage for 2 weeks in
35 late adolescence with 1 mg/kg b.w./day oral BPA, whereas Komada *et al.* (2012)
36 described a similar effect in the fetus after *in utero* exposure to 200 µg/kg b.w./day.

37 In the study by Xu *et al.* (2013), mouse dams were orally exposed to BPA (4, 0.4 or 0.04
38 mg/kg b.w./day) from GD 7 through PND 21. Results showed that BPA (lower and higher
39 doses) significantly reduced the numeric synaptic density of pyramidal cells in
40 hippocampus CA1 region on PND 14, 21 and 54 in male offspring ($p < 0.001$). The
41 reduced density was paralleled by significant modification of structural parameters
42 indicative of synaptic functionality (enlargement of synaptic cleft by 0.4 and 4 mg/kg BPA
43 and reduction of the active synapse zone as indicated by decreased Post Synaptic Density
44 at 0.4 and 4 mg/kg BPA on PND 14 and PND 21, respectively. BPA also reduced the
45 expression of synapsyn 1 and PSD95 in a dose-dependent fashion at all the time
46 endpoints analysed. In addition, exposure to BPA markedly reduced the expression of
47 both glutamate NMDA and AMPA receptors in the hippocampus on PND 14, 21 and 56 at
48 the doses of 0.04 and 4 mg/kg 3118 b.w./day.

49 Finally, two *in vitro* studies showed that BPA concentrations in the nanomolar range
50 inhibits NGF- induced neurite extension in PC12 cells (Seki *et al.*, 2011), while BPA
51 significantly enhanced spinogenesis when added to isolated hippocampal slices obtained
52 from untreated adult male Wistar rats (BPA concentrations ranging from 1 nM to 10 µM),
53 with mechanisms likely independent from estrogen receptors (Tanabe *et al.*, 2012).

1 Conclusion

2 There is uncertainty with regard to the interpretation of the data regarding neurological
3 effects of BPA. In several studies an increased anxiety was observed. However, studies
4 on anxiety (rodent and non-human primate) have a behavioural endpoint which is
5 sensitive for a number of factors such as study design, testing apparatus, inclusion of
6 only one sex, and age at examination. New data confirm previous data that BPA has an
7 effect on sex-dimorphic social behaviour. However, it is disputed whether elimination of
8 sexual dimorphism could be considered as an adverse effect in extrapolating to humans.
9 Gene expression in the brain was also altered either after prenatal BPA exposure and BPA
10 exposure in adult mice. Other effects of BPA on hypothalamic organisation involve
11 mechanisms different from its estrogenic properties because the effects of oestradiol
12 were different. The variety of read-out parameters and the effects observed warrant
13 further investigation of the possible neurological and behavioural effects of BPA.

14

15 **3.9.5. Immunotoxicity**

16 In previous reviews on BPA, it was concluded that BPA is capable of inducing skin
17 sensitization responses in humans with low prevalence being a weak sensitiser (EFSA
18 2010, FAO/WHO 2011, EC 2010a, ANSES 2011). Some individual cases were also
19 reported describing contact dermatitis against BPA (Aalto-Korte *et al.*, 2003). The results
20 of rodent studies suggest that BPA may modulate immune homeostasis especially
21 regarding the induction of T-cells and cytokine production directing the immune response
22 into an allergy prone profile. (EFSA 2010, FAO/WHO 2011, EC 2010a, ANSES 2011).
23 However, the results were insufficient to conclude on immunotoxic activity of BPA, and
24 the immune system was considered to be an area of interest for further research.

25 The study of Lee *et al.* (2012) evaluated possible mechanisms of sensitization induced by
26 BPA through investigating the cytokine profiles after BPA exposure. Mice were injected
27 intraperitoneally with BPA (5 mg/kg b.w.). Total non-specific IgE antibodies and β -
28 hexosaminidase and histamine (both inducing degranulation of mast cells) in serum were
29 increased. The results are indicative for an effect of BPA on the immune system at doses
30 higher than the PoD considering the route of exposure, however, no specific immune
31 responses were measured.

32 Kendziorzsky *et al.* (2012) investigated the response of BPA in a specific mouse strain
33 prone to develop pyometra. BPA was observed to induce pyometra in one of two mice
34 strains investigated similar to 17 α -ethinyl estradiol. For both compounds only one dose
35 induced pyometra, and a dose-response relationship was not established. The authors
36 concluded that there was a strain specific estrogen sensitivity resulting in pyometra in
37 C57Bl/6 versus CD1 mice. However, only in one out of five animals treated with BPA
38 pyometra was observed. No effects of BPA were observed on fertility in both C57Bl/6 and
39 CD1 mouse strains. The results of the study are of no value for the risk assessment.

40 Nakajima *et al.* (2012) exposed mice to 10 μ g/ml BPA in their drinking water from 1
41 week before pregnancy until PND 22. The treatment with BPA, followed by postnatal
42 allergic sensitization with ovalbumin and a challenge at PND 22, promoted the
43 development of ovalbumin-induced allergic asthmatic responses (airway hyperreactivity,
44 increase in eosinophilic granulocytes).

45 In three studies, data of the US NHANES were used for evaluation of possible BPA effects
46 on allergies (Clayton *et al.*, 2011, Savage *et al.*, 2012, Vaydia *et al.*, 2012). All three
47 studies used spot urinary BPA levels for their evaluations. Clayton *et al.*, (2011)
48 evaluated urinary BPA levels and the presence of viral antibodies and allergy in children
49 older than 6 years of age. BPA showed no association with allergy diagnosis, whereas the
50 evaluations of the CMV antibodies showed contradicting results in different age groups.
51 Both low and high BPA urinary levels were associated with a higher antibody levels.
52 Savage *et al.*, (2012) evaluated urinary BPA levels and the sensitization against
53 aeroallergens and food allergens by measurement of antigen specific IgE levels in sera.

1 For BPA, no associations with IgE levels were observed, whereas for some other
2 chemicals investigated an association was observed. However, Vaydia et al., (2012) did
3 find an association between urinary BPA levels and allergic asthma based on total IgE
4 determinations and allergen specific IgE levels. BPA was associated with a higher
5 likelihood of allergic asthma in females but not in males.

6 In two studies, BPA exposure of mothers and presence of wheeze in their children was
7 investigated. Spanier et al. (2012) measured spot urinary levels in pregnant women at
8 week 16 and 26 of gestation and at birth. In general, BPA levels were not associated with
9 the occurrence of wheeze in the children. However, mean prenatal BPA above versus
10 below the median was positively associated with wheeze at 6 months of age but not at 3
11 years. Another mother and child cohort was reported by Donohue et al., (2013), in which
12 urinary BPA levels were evaluated in relation to occurrence of wheeze. Higher prenatal
13 BPA levels were associated with a lower occurrence of wheeze at five years of age. In
14 contrast, post-natal BPA levels in the children indicated that higher BPA levels were
15 associated with an increase in wheeze and asthma.

17 Conclusion

18 BPA is able to elicit skin sensitization in humans, probably as a result of it being a weak
19 sensitiser. Studies on a possible relationship between prenatal and/or postnatal BPA
20 exposure and allergic responses are not consistent. Other studies on immunotoxic
21 responses are insufficient to draw final conclusions: although effects on the immune
22 system are suggested, there is uncertainty on the immunotoxicity of BPA. In view of the
23 suggested effects of BPA on the immune system, further investigation into potential
24 immunotoxicity of BPA are warranted.

26 **3.9.6. Cardiovascular effects**

27 None of the large-scale experimental animal studies (90 days, 2 years carcinogenicity
28 study) suggest effects on cardiovascular function (see Risk Assessment Report EC ECB
29 2003, 2008). In conclusion, the toxicological data do not indicate a clear effect of BPA on
30 cardiovascular function.

31 **3.9.7. Metabolic disorders**

32 Summary of previous opinions

33 In the EU-RAR of 2003, updated in 2010 (ECB 2003, EC 2010a,b), metabolic effects of
34 BPA were not mentioned. Whereas EFSA did not give reports addressing the effects of
35 BPA on the metabolism of experimental animals in the 2006 Opinion (EFSA 2006), in the
36 2010 EFSA Opinion (EFSA 2010) publications were cited with effects of BPA on insulin
37 secretion in mice (Ropero et al., 2008) and increased adipogenesis in the female
38 offspring of rats exposed prenatally to BPA (mean oral dose 70 µg/kg b.w./day) (Somm
39 et al., 2009) and aggravated insulin resistance in mice during pregnancy at s.c. doses of
40 10 or 100 µg/kg/d (Alonso-Magdalena et al., 2010). The study of Ryan et al. (2010) was
41 cited showing no indications of increased susceptibility to induced obesity by high fat diet
42 and of glucose intolerance in adult mice exposed prenatally to BPA (0.25 µg/kg b.w./day
43 orally). The NTP-CEHR monograph (US NTP 2008) reviewed the study of Alonso-
44 Magdalena et al. (2006) and the study of Miyakawa et al. (2007). Because of the limited
45 data, the NTP-CEHR monograph did not make a firm conclusion concerning metabolic
46 effects of BPA. In the FAO-WHO opinion (2011) the experts expressed their view that the
47 data of Miyakawa et al. (2007), Somm et al. (2009), Alonso-Magdalena et al. (2010) and
48 Ryan et al. (2010) warranted further assessment of the potential effects of BPA on
49 adiposity, glucose or insulin regulation, lipids and other endpoints related to diabetes or
50 metabolic syndrome.

51 The 2011 ANSES report reviewed the studies also considered by FAO-WHO and as well as
52 a study by Rubin *et al.* (2001). This study showed obesity in the offspring of Sprague-

1 Dawley female exposed via drinking water, at approximately 0.1 mg or 1.2 mg from GD6
2 throughout the period of lactation. According to the ANSES report, effects of BPA on
3 lipogenesis in experimental animals were proven (including adipocyte hypertrophy,
4 predisposition to obesity, elevated cholesterol levels and triglyceride levels and over-
5 expression of lipogenic proteins) following pre-and perinatal exposure in adults. The
6 ANSES risk assessment report (2013) confirmed this view and stated that the increase in
7 body weight in experimental animal studies, together with increases in plasma lipids
8 (such as cholesterol and triglycerides) and lipogenesis, are critical effects. According to
9 ANSES (2013), the Miyakawa *et al.* (2007) study in ICR mice is considered the pivotal
10 study for risk assessment, and a LOAEL of 0.26 mg/kg b.w./day was derived based on an
11 increase in body weight and an increase in cholesterolemia in females.

12 Since the EFSA opinion of 2010, the WHO Expert meeting of 2010 and the ANSES report
13 of 2011, several additional experimental studies have reported metabolic effects of BPA
14 (including effects on body weight/obesity, lipogenesis or adipogenesis) and/or effects
15 related to glucose or insulin regulation. Studies published over the last 5 years include
16 Miyawaki *et al.*, 2007; Somm *et al.*, 2009; Alonso-Magdalena *et al.*, 2010; Ryan *et al.*,
17 2010 and Wei *et al.*, 2011. Findings from these studies include reports of glucose
18 intolerance and hyperinsulinaemia in the 6-month-old male offspring of OF-1 mice
19 treated from GD9 to GD16 with BPA at 10 or 100 µg/kg b.w. per day. In the study by
20 Alonso-Magdalena *et al.* (2010), the administration was by subcutaneous injection of 10
21 µg/kg b.w./day or 100 µg/kg b.w./day. Importantly, the s.c. administration has a
22 systemic availability of 100%, whereas the systemic availability of an oral dose is 2%
23 (Doerge *et al.*, 2012).

24 Thus, 10 µg/kg b.w./ day and 100 µg/kg b.w./day s.c. corresponds to 500 µg/kg
25 b.w./day and 5000 µg/kg b.w./day by the oral route. The endpoints measured were
26 manifold and the dose-response relationship was not monotonic for all of them. Somm *et al.*
27 (2009) observed adipocyte hypertrophy and increased mass of parametrial white
28 adipose and brown adipose tissue on postnatal day (PND) 21 in female offspring of
29 Sprague-Dawley rats who were orally treated with BPA approximately 70 µg/kg b.w. per
30 day in drinking-water from GD 6 to PND 21. Furthermore, increased cholesterol on PND
31 31 was observed in female offspring of ICR mice orally treated with BPA (in drinking-
32 water) at approximately 260 or 2600 µg/kg b.w. per day. Exposure was from GD 10 to
33 weaning via the dam and then after weaning with the same drinking water treatment as
34 the dam (Miyawaki *et al.*, 2007). In the most recent study of Wei *et al.* (2011), doses of
35 50µg/kg, 250µg/kg and 1250 µg/kg were given by oral gavage throughout gestation and
36 lactation.

37 Effects were increased body weight, elevated serum insulin and impaired glucose
38 tolerance in adult offspring. It was striking that effects were only observed at the 50
39 µg/kg/d dose and only in male offspring. Effects in males were accelerated and more
40 severe when offspring were fed a high-fat-diet. In this group, severe metabolic
41 syndrome, dyslipidaemia, hyperleptinaemia, hyperglycaemia, hyperinsulinaemia and
42 glucose intolerance were observed. In contrast, Ryan *et al.* (2010) observed changes in
43 body weight and size in mice which are not longer apparent when the animals reach
44 adulthood. The study results taken together are inconsistent: the effects were seen only
45 in females (Somm *et al.*, 2009), but also in males only (Wei *et al.*, 2011). Also the doses
46 where effects have been observed are at variance in the studies and contradictory results
47 have been observed.

48 The animal studies have shown an increase (Miyawaki *et al.*, 2007; Rubin *et al.*, 2001;
49 Somm *et al.*, 2009, Wei *et al.*, 2011, Mackay *et al.*, 2013), a decrease (Honma *et al.*,
50 2002; Nagel *et al.*, 1997), or no effect on body weight (Ryan *et al.*, 2010, Marmugi *et al.*,
51 2012, Mackay *et al.*, 2013, Anderson *et al.*, 2013) after early life exposure to BPA and
52 the effect can occur in both or only one sex (Somm *et al.*, 2009; Alonso-Magdalena *et al.*,
53 2010, Mackay *et al.*, 2013). The discrepancy among these animal studies may arise

1 from variety of experimental conditions, such as dosing regimens, animal species and
2 strains, and timing of evaluation of effects.

3

4 In vivo studies involving prenatal exposure

5 Xu *et al.* (2011) suggested that an increased preference of adult rats for a sweet taste,
6 potentially resulting in obesity, could be linked to prenatal exposure to BPA. Female
7 Sprague Dawley rats were exposed to BPA in drinking water at doses of 0.01, 0.1 and
8 1.0 mg/L from G11 to lactation day 21. A significant sex difference in preference for a
9 sweet taste was evident in both BPA-treated and non-BPA-treated offspring, with all
10 females including controls showing a preference for saccharin-containing drinking water
11 compared with plain water. There was no evidence of a treatment-related effect.
12 However, male offspring showed an increased preference for 0.25% (but not for 0.5%)
13 saccharin, and for 15% sucrose, compared with male controls. The preference for 15%
14 sucrose was reversed in BPA-treated females compared with controls, implying the
15 feminization of males and masculinization of females. Male offspring from dams receiving
16 0.1 mg/L BPA who were administered 15% sucrose in their drinking water postnatally
17 also showed increased body weight gain, a higher percentage of body fat and higher tail
18 blood pressure compared to the control group. The inconsistency in the response to
19 saccharin (preference for 0.25% but not for 0.5% saccharin) is noted, interpretation of
20 the saccharin preference results was difficult. In addition, there is no explanation why
21 only the middle dose of BPA pups for the sucrose preference test was chosen. These
22 drawbacks limit the conclusions that can be drawn from the study.

23

24 Wei *et al.* (2011) administered doses of 0, 50, 250 or 1250 µg BPA/kg b.w. per day orally by gavage in
25 corn oil to pregnant Wistar rats from GD0 to PND2. The offspring (n=16 per group, 2 from each of 8
26 litters) were maintained on either a normal or a high fat diet for 16 weeks, with monitoring of body
27 weight and blood parameters (triglycerides, cholesterol, low- and high-density lipoprotein) and
28 periodic glucose tolerance and insulin tolerance tests throughout the experimental period:
29 morphology and function of the pancreas was assessed at termination at week 27. The authors
30 present only results for the 50 µg/kg b.w./day dose in their paper, which limits the interpretation of
31 the data. Offspring exposed prenatally to 50 µg BPA/kg b.w. per day and maintained on a normal diet
32 showed increased weight gain from week 17 (females) or week 19 (males), and serum insulin levels
33 were higher at week 15 for males and at week 26 for females. Effects were more evident in animals
34 fed a high fat diet. No effects of BPA were observed at the two higher doses (250 or 1250 µg BPA/kg
35 b.w. per day). Serum leptin was elevated in 50 µg BPA/kg b.w. BPA-treated animals compared with
36 controls at week 26; the animals also had a higher body fat percentage and showed hypertrophy of
37 adipocytes. Mitochondrial structure and insulin granule characteristics in pancreatic β-cells were
38 altered by BPA at 50 µg/kg b.w. per day and mRNA expression of islet-associated transcription
39 factors were reduced compared to controls. This investigation was carried out in the 50 µg/kg
40 b.w./day group only.

41 In the study of MacKay *et al.* (2013), CD mice were exposed from GD 1 until PND21 to
42 diets containing 0, 1 or 20 µg BPA/kg, estimated to be equivalent to an average of 0.19
43 and 3.49 µg/kg b.w. per day prenatally and 0.36 and 7.2 µg/kg b.w. per day of BPA
44 postnatally. Offspring were weaned initially onto a normal diet, then as adults exposed to
45 either a normal or high-fat diet (HFD). Female offspring at the higher BPA dose level and
46 fed a high fat diet showed increased body weight gain as adults compared with controls
47 and the DES positive control, and also ate more. They had increased adiposity and leptin
48 concentrations with reduced propio-melanocortin mRNA expression in the arcuate
49 nucleus and estrogen receptor α expression patterns similar to those seen in males,
50 which the authors considered to be suggestive of a masculinising effect of BPA. Male
51 offspring showed no similar BPA-linked effect on body weight gain; however, males at
52 both levels of BPA showed a dose-related increase in weight in the retroperitoneal and

1 intrascapular brown adipose fat pads compared with control and DES-exposed mice, and
2 similar effects were seen in female offspring at the higher dose but not at the lower level
3 of BPA. The extent of the effects was small. Males exposed to the high dose of BPA
4 showed impaired glucose tolerance on both diets.

5 Anderson *et al.* (2013) exposed mice starting at two weeks before mating until the end of
6 lactation (PND 21) to 0, 50 ng, 50 µg or 50 mg of BPA/kg of diet corresponding to 0,
7 10.75 ng, 10.75 µg, and 10.75 mg/kg b.w./day. A subset of animals, 1 male and 1
8 female/litter, was followed until 10 months of age on standard diet or diets containing
9 BPA at the same levels as administered to the dams. The authors found increased energy
10 expenditure as evidenced by increased oxygen consumption and carbon dioxide
11 production in all BPA-treated animals. Notably, however, that the dose-response
12 relationship was inconsistent. Spontaneous activity was increased, but only in females.
13 Food consumption in females was reduced to a statistically significant extent but without
14 a clear dose-response, whereas in males the reduction of food intake was not statistically
15 significant. Body weight and body fat was not statistically different from control in either
16 sex and glucose tolerance and insulin release were also unchanged.

17 A further study was published by Angle *et al.* (2013). Pregnant CD-1 mice BPA were
18 given BPA at oral doses ranging from 5 - 50,000 µg/kg/day from GD 8 until GD 18. In
19 the male offspring from the animals, a large number of endpoints were measured (body
20 weight; gonadal and renal fat pad weight; adipocyte number and adipocyte volume; food
21 (metabolic energy) consumption; glucose and insulin tolerance tests; serum hormones
22 (such as insulin, leptin, adiponectin) at different time points and statistical assessment
23 explored several models. Most of the endpoints showed non-monotonic changes which
24 are difficult to assess. No pathophysiological model can be derived from the data and no
25 biological explanation can be given at present.

26

27 *In vivo* studies in adult mice and rats

28 D’Cruz *et al.* (2012) dosed male rats (n = 6 per group) with BPA (0.005, 0.5, 50 and 500
29 µg/kg b.w. per day orally) for 45 days. 17-β-estradiol (50 µg/kg b.w./day) was used as a
30 positive control. A whole array of endpoints was measured: Plasma glucose, plasma
31 insulin and enzymes involved in glucose metabolism were investigated. In addition,
32 testicular levels of insulin, insulin signalling molecules, glucose transporter-2, antioxidant
33 enzymes and steroidogenesis were also evaluated. Levels of plasma glucose and insulin
34 were significantly increased even at the lowest level of BPA exposure of 5 ng/kg b.w. per
35 day, whereas the testicular glucose level significantly decreased, again at all dose levels.
36 Levels of insulin and various insulin signalling molecules were significantly decreased in
37 testis by BPA in a dose-related manner even at the lowest dose of 5 ng/kg b.w./day. A
38 significant decrease in testicular superoxide dismutase and catalase activities was
39 measured following BPA exposure at all doses, and lipid peroxidation was increased,
40 together with decreases in testicular marker proteins and key enzymes of
41 steroidogenesis. There was evidence of testicular damage as evidenced by loss of germ
42 cells and decrease in the spermatids in rats treated with 500 µg BPA, as well as in the
43 positive control. The authors concluded that low doses of BPA affect insulin signalling and
44 glucose, possibly leading to impairment of testicular function.

45 Batista *et al.* (2012) administered subcutaneously a dose of 100 µg BPA/kg b.w./day
46 divided into two subcutaneous injections to 3-month old Swiss albino OF1 mice for 8
47 days. Whole body energy homeostasis and responses of insulin sensitive peripheral
48 tissues were assessed. Higher plasma insulin concentrations in the fed state and
49 increased glucose-stimulated insulin secretion in isolated pancreatic islet of Langerhans
50 were shown for BPA treated animals, in addition to changes in insulin signaling. Glucose
51 tolerance testing showed that BPA-treated mice were insulin resistant. Whole-body
52 energy homeostasis, as assessed by food intake, locomotor behaviour and nocturnal
53 energy expenditure was reduced. In contrast, the respiratory exchange ratio was
54 unchanged. Hence, the findings of this study were contradictory in themselves.

1 Male CD1 mice were dosed with 0, 0.05, 0.5, 5 or 50 mg/kg BPA in the diet, estimated
2 by the authors to be equivalent to 0, 5, 50, 500 and 5000 µg/kg b.w./day for 28 days
3 (Marmugi *et al.*, 2012) After the treatment period, measurements were taken for body
4 weight gain, liver weight and weight of perigonadic white adipose tissue (pWAT), hepatic
5 lipid content and fatty acid composition, plasma levels of insulin, triglycerides, glucose,
6 total cholesterol, and low- or high-density lipoprotein (LDL, HDL) cholesterol. In addition,
7 the effects of BPA on gene expression in the liver were assessed using microarrays. No
8 effect was seen on body weight gain and relative liver weight, but pWAT weight was
9 significantly increased in mice receiving 50 µg/kg b.w./day (but not at higher dose
10 levels). Plasma insulin levels were significantly increased following exposure to 5, 50, and
11 500 µg BPA/kg b.w./day: the lowest dose produced the greatest effect. Plasma glucose
12 and total, LDL- or HDL-cholesterol were not different from control. Mice exposed to 500
13 µg BPA/kg b.w./day showed a significant increase in plasma triglyceride levels. The
14 effects were confirmed in a further study in C57BL/6J mice given the same BPA doses,
15 although the changes were generally of a smaller magnitude. The results of the
16 microarray assays showed a stimulatory effect of BPA on expression of key enzymes
17 involved in lipogenesis, cholesterol biosynthesis and, to a lesser extent, enzymes
18 involved in glucose metabolism. A stronger response was seen in the liver of mice dosed
19 with 50 µg/kg b.w./ day than those dosed with 5000 µg/kg b.w./day. Hence, a non-
20 monotonic dose-response seems to exist.

21 Bodin *et al.* (2013) investigated possible effects of BPA on the development of type 1
22 diabetes (T1DM). They gave 0, 1 and 100 mg/L BPA in the drinking water (corresponding
23 to intakes of 0, 150 or 15000 µg/kg b.w./day) to non-obese pre-diabetic (NOD) mice.
24 The prevalence and extent of insulinitis did not differ between groups at week 7. At week
25 12, markedly increased effects were seen compared with controls only in female mice
26 and only exposed to 1 mg/l BPA in drinking water, being less severe in the dosing group
27 of 100 mg/l. Prevalence and extent of insulinitis was decreased in male mice exposed to
28 BPA compared with controls. Serum glucose levels were increased in the 1 mg/ml BPA
29 group, indicating an accelerated onset of T1DM, but this was not seen in the animals
30 exposed to 100 mg/l BPA. Insulin levels did not differ significantly between the groups.
31 Serum levels of T4, cytokines and autoantibodies did not differ between the groups.

32 In the studies of the Jayashree group (Jayashree *et al.*, 2013; Indumathi *et al.*, 2013),
33 BPA (0, 20 or 200 mg/kg b.w./day orally) was administered for 30 days to adult male
34 Wistar rats. The effects of BPA were investigated on insulin signal transduction and
35 glucose oxidation in skeletal muscle and liver. After 30 days of treatment serum insulin
36 was significantly increased by BPA in a dose-related manner whereas glucose oxidation
37 was reduced at both dose levels in liver and in skeletal muscle, and glycogen content of
38 the liver was also reduced. In skeletal muscle, treatment with BPA at both 20 and 200
39 mg/kg b.w., significantly decreased the levels of insulin receptor, of protein kinase B and
40 of glucose transporter-4 levels (both plasma membrane and cytosolic fraction). However,
41 the mRNA levels for these proteins were unchanged. In the liver, both mRNA and protein
42 levels were significantly decreased at the highest BPA-exposed group.

43 Female F-344 rats were dosed with 0.025, 0.25 or 2.5 mg BPA/L in drinking water from
44 five to 15 weeks of age (Rönn *et al.*, 2013). The drinking water contained 5% fructose
45 (n= 12 per group) and BPA intake, calculated by the authors, was between 4.6 (week 9)
46 and 5.6 (week 2) µg/kg b.w./day at the lowest dose, between 46.3 (week 6) and 61.6
47 (week 3) µg/kg b.w./day at the mid dose and 400.3 (week 9) and 595.3 (week 2) µg/kg
48 b.w./day at the highest dose. The authors measured adipose tissue volume and liver fat
49 content by magnetic resonance imaging (MRI). Further endpoints were cholesterol,
50 triglycerides and apolipoprotein A-1a, changes in body weight and weight of the perirenal
51 fat pad. There were no significant effects of BPA exposure on body weight or weight of
52 the perirenal fat pad, and no differences were seen in total or visceral adipose tissue
53 volumes between the groups. However, liver fat content was significantly higher in rats
54 receiving the two higher doses of BPA compared with controls (p = 0.04). BPA exposure
55 also increased the apolipoprotein A-I levels in plasma (p < 0.0001), a favourable

1 modification in the lipid profile because apolipoprotein A-I is the main component of the
2 high density lipoprotein (HDL).

3 Conclusion on metabolic effects of BPA in animals

4 Studies in rats and mice which were prenatally and postnatally exposed to BPA indicate
5 that an effect on metabolic parameters was elicited, measured by effects on glucose or
6 insulin or lipogenesis. The animal studies have shown an increase (Miyawaki *et al.*, 2007;
7 Rubin *et al.*, 2001; Somme *et al.*, 2009, Wei *et al.*, 2011, Mackay *et al.*, 2013), a decrease
8 (Honma *et al.*, 2002; Nagel *et al.*, 1997), or no effect on body weight (Ryan *et al.*, 2010,
9 Marmugi *et al.*, 2012, Mackay *et al.*, 2013, Anderson *et al.*, 2013) after early life
10 exposure to BPA and the effect can occur in both or only one sex (Somme *et al.*, 2009;
11 Alonso-Magdalena *et al.*, 2010, Mackay *et al.*, 2013). The discrepancy among these
12 animal studies probably arise from variation in experimental conditions, such as dosing
13 regimes, animal species and strains, and timing of evaluation of effects. There is no
14 consistent evidence that BPA is obesogenic in adulthood after intrauterine exposure or in
15 longer-term studies. In some of the studies, the authors claim that the findings indicate a
16 non-monotonic dose-response as effects seen at a lower dose were not observed in
17 higher doses. However, effects were seen only at one dose level and not in at least two
18 dose levels with a decline at higher dose levels, thus corroborating the existence of non-
19 monotonicity.

20 Epidemiological studies

21 Some epidemiological studies also reported an association in adults of actual BPA levels
22 in urine with cardiometabolic disorders (Lang *et al.*, 2008, Melzer *et al.*, 2010), or with
23 obesity in children and adolescents (Trasande *et al.*, 2012), but the validity of these
24 results from the cross-sectional NHANES data were afterwards disputed (LaKind *et al.*,
25 2012). Other epidemiological studies indicate inconsistent findings for an association
26 between prenatal BPA exposure and a low birth weight, a predictor of obesity later in life
27 (Lee *et al.*, 2008, Miao *et al.*, 2011, Padmanabham *et al.*, 2008, Wolff *et al.*, 2008).
28 Hence, no firm conclusion can be drawn at present.

29 In vitro studies

30 Several *in vitro* studies were published after 2010 reporting the effects of BPA on insulin
31 secretion, mitochondrial morphology and function and gene expression in different cell
32 types.

33 In the presence of low glucose concentrations, 3 mM BPA had no effect (Soriano *et al.*,
34 2012) Insulin secretion stimulated by high glucose levels (8-17.7 M) was further
35 increased by treatment with BPA concentrations (10⁻¹⁰ M, 10⁻⁹ M and 2x10⁻⁹ M) in
36 mouse and human islets, in primary rat islet cells and in a rat insulinoma cell line
37 (Soriano *et al.*, 2012; Song *et al.*, 2012; Lin *et al.*, 2013). These concentrations
38 correspond to 22,8 ng/L, 228 ng/L and 465 ng/L, far above concentrations calculated in
39 humans after oral exposure to BPA which are in the 10⁻¹² M range (Teeguarden *et al.*,
40 2013). The results from Soriano *et al.* (2012) suggest that BPA's effects on insulin
41 secretion, KATP channel activity and glucose-induced [Ca²⁺] oscillations in pancreatic β -
42 cells are linked to the presence of ER β .

43 BPA-induced toxicity and apoptosis was associated with changes in the morphology and
44 the membrane potential of mitochondria of pancreatic cells induced by BPA
45 concentrations (10⁻¹² M - 10⁻⁸ M) in the human hepatic cell line HepG2 (Huc *et al.*,
46 2012).

47 In isolated human adipose tissue taken from children, BPA at 10⁻⁸ M increased the
48 expression of 11 β -hydroxysteroid-dehydrogenase, PPAR α and lipoprotein lipase and, in
49 addition, induced lipid droplet accumulation in adipocytes at terminal differentiation
50 (Wang *et al.*, 2013). Using transfection gene reporter assays with monkey kidney cells,
51 Sheng and co-workers (2012) observed a BPA (10⁻⁹ M to 10⁻⁷ M)-induced suppression

1 of thyroid hormone receptor transcription through a non-genomic pathway. However, the
2 relevance of the model for the *in vivo* situation is unclear.

3 Conclusions on metabolic activity

4 Several studies in laboratory animals published in the last 5 years and more recently
5 directly address the issue of whether developmental exposure to BPA can affect
6 adiposity, glucose or insulin regulation, lipid profiles or other endpoints related to
7 diabetes or metabolic syndrome. Effects were increased body weight, elevated serum
8 insulin, and impaired glucose tolerance in adult offspring. There is inconsistency in the
9 results, as in some studies, effects were observed only in male offspring while in other
10 studies, effects were only observed in female offspring. In addition, effects were not
11 consistently induced by similar dosages and studies showing a lack of increase or even a
12 decrease in body weight were reported. BPA exposure also affected various metabolic
13 endpoints in adult rodents exposed to BPA. In some of the studies, the findings have
14 been taken as evidence for a non-monotonic dose-response because effects seen at a
15 lower dose were not observed at higher doses. However, effects were sometimes seen
16 only at one dose level. There are no studies which demonstrate effects of different effect
17 size at two consecutive dose levels and/or no or a reduced effect at a higher dose, thus
18 corroborating the existence of non-monotonicity. In addition, epidemiological studies do
19 not show unequivocal convincing evidence for metabolic effects of BPA. In view of the
20 inconsistent results, no firm conclusions can be drawn at present, but the data warrant
21 further assessment of the potential effects of BPA on adiposity, glucose or insulin
22 regulation, lipids and other endpoints related to diabetes or metabolic syndrome.

23 *In vitro* BPA was found to increase cellular insulin secretion only at high glucose levels,
24 whereas at low glucose levels, a high BPA exposure was needed. In addition, lipid droplet
25 accumulation was induced by BPA in human adipose tissues at relative high
26 concentrations that could also induce cytotoxicity and apoptosis of the cells.

27

28 **3.9.8. Reproductive and developmental toxicity**

29 A host of studies is available on the effects of BPA on reproduction and prenatal
30 development some of which were performed according to internationally agreed
31 guidelines and in compliance with GLP. A wealth of *in vitro* results and studies on non-
32 intact animals (such as ovariectomized rodents) is available, but their value for risk
33 assessment is questionable. There are also uncertainties as to reproducibility of several
34 individual studies. The text below focuses on GLP-compliant guideline-based generation
35 and developmental studies. These studies were conducted in rats and mice. Chapin *et al.*
36 (2008) performed a comprehensive review of all available animal studies. A selection of
37 studies critical for the determination of reproductive and developmental toxicity and the
38 derivation of NOAELs is revisited below.

39 Morrissey *et al.* (1987) studied the developmental toxicity of BPA in CD rats (0, 160, 320,
40 or 640 mg/kg b.w./day) and CD-1 mice (0, 500, 750, 1000, or 1250 mg/kg b.w./day)
41 dosed daily by gastric intubation on Gestational Days 6 through 15. In rats, maternal
42 weight gains during gestation, weight gain corrected for gravid uterine weight and weight
43 gain during treatment were significantly reduced at all BPA doses. Gravid uterine weight
44 and average foetal body weight per litter were not affected by BPA. No increase in
45 percentage resorptions per litter or percentage fetuses malformed per litter was
46 detected. In mice, maternal mortality occurred at all BPA doses, reaching 18% at the
47 high dose, which also produced a significant decrease in maternal body weight gain
48 during gestation and treatment. Weight gain corrected for gravid uterine weight was not
49 affected by BPA. Reductions in gravid uterine weight and average foetal body weight
50 were observed with the 1250 mg/kg dose of BPA. Relative maternal liver weight was
51 increased at all doses of BPA. There was a significant increase in the percentage of
52 resorptions per litter with 1250 mg BPA/kg b.w./day. Malformation incidence was not
53 altered by BPA. Thus, BPA treatment at maternally toxic dose levels during

1 organogenesis produced foetal toxicity in mice but not in rats and did not alter foetal
2 morphologic development in either species.

3 Ema *et al.* (2001) conducted a two-generation study in Crj:CD(SD) IGS rats using doses
4 of 0.2, 2, 20 and 200 µg/kg b.w./day by oral gavage, starting exposure 10 and 2 weeks
5 before mating in males and females, respectively. No compound-related clinical signs or
6 effects on body weight or food consumption were observed in any generation. There
7 were no compound-related changes in surface righting reflex, negative geotaxis reflex,
8 mid-air righting reflex, pinna detachment, incisor eruption, eye opening, testes descent,
9 preputial separation, or vaginal opening in F1 and F2 generations, or behavior in the
10 open field or water filled multiple T-maze tests in the F1 generation. No test compound-
11 related changes in estrous cyclicity, copulation index, fertility index, number of
12 implantations, gestation length, litter size, pup weight, pup sex ratio, pup viability, or
13 other functional reproductive measures were noted in any generation. A few significant
14 changes in the anogenital distance (AGD) per cube root of body weight ratio were found
15 at 0.2 and 20 µg/kg b.w. in F1 males, at 2, 20, and 200 µg/kg b.w. in F1 females and at
16 20 and 200 µg/kg b.w. in F2 females. However, the changes in the AGD were
17 consistently small (within 5% of control values), and no continuous changes in the AGD
18 or AGD/cube root of body weight ratio were detected. There were no compound-related
19 changes in epididymal sperm counts or motility in F0 and F1 males. No compound-
20 related necropsy findings or effects on organ weight, including the reproductive organs,
21 were found in any generation. Histopathologic examinations revealed no evidence of
22 compound-related changes in any organs including the reproductive organs of both
23 sexes. The data indicate that oral doses of BPA of between 0.2 and 200 µg/kg b.w. over
24 two generations did not cause significant compound-related changes in reproductive or
25 developmental parameters in rats.

26 Tyl *et al.* (2002) performed a three-generation study in Sprague Dawley rats using a
27 wide range of dietary doses of 0.001 to 500 mg/kg b.w./day. Adult systemic toxicity
28 occurred at 50 mg/kg b.w./day including reduced body and organ weight gain, with
29 hepatic pathology at 500 mg/kg/day. Ovarian weights as well as total pups and live
30 pups/litter on postnatal day (PND) 0 were decreased at 500 mg/kg b.w./day, which
31 exceeded the adult maximum tolerated dose (MTD). Mating, fertility, gestational indices;
32 ovarian primordial follicle counts; estrous cyclicity; precoital interval; gestational length;
33 offspring sex ratios; postnatal survival; nipple/areolae retention in preweanling males;
34 epididymal sperm number, motility, morphology; daily sperm production (DSP), and
35 efficiency of DSP were all unaffected. Adult systemic toxicity no observed adverse effect
36 level (NOAEL) was 5 mg/kg b.w./day; reproductive and postnatal NOAEL was 50
37 mg/kg/day. There were no treatment-related effects in the low-dose region (0.001-5
38 mg/kg b.w./day) on any parameters and no evidence of nonmonotonic dose-response
39 curves across generations for either sex. The authors conclude that BPA should not be
40 considered a selective reproductive toxicant, based on the results of this study.

41 Kobayashi *et al.* (2002) exposed Crj:CD(SD) IGS rat dams to 0, 4 or 40 mg/kg/day from
42 GD6 through PND20. There were no significant changes in body weight, liver weight,
43 kidneys weight, testes weight, AGD, the ratio of AGD to body weight, or the ratio of AGD
44 to the cube root of body weight in BPA exposed pups compared to the vehicle-exposed
45 control. The authors conclude that prenatal and postnatal exposure (indirect exposure) to
46 BPA (4–40 mg/kg b.w./day, GD 6–PND 20) does not affect somatic growth or AGD of F1
47 generation of male and female rats.

48 Tyl *et al.* (2008) conducted a two-generation study of BPA in CD-1 mice. F0 and F1 mice
49 (28 sex/group/generation) were fed diets containing BPA (99.70–99.76% purity) at 0.018,
50 0.18, 1.8, 30, 300, or 3500 ppm. Target intakes were 0.003, 0.03, 0.3, 5, 50, or 600
51 mg/kg b.w./day, respectively. A concurrent positive control group of dietary 17beta-
52 estradiol (0.5 ppm; 28 per sex) confirmed the sensitivity of CD-1 mice to an endogenous
53 estrogen. There were no clinical signs of toxicity or treatment-related deaths in F0 or F1
54 males or females. Increases in weight, both absolute and relative to body or brain, of the
55 kidney and liver were consistently observed in F0 and F1 adults (males and females) at

1 the highest dose level. At 50 mg/kg b.w./day hepatocyte hypertrophy was noted and at
2 600 mg/kg b.w./day body and organ weight effects were also observed. Incidence of
3 minimal to mild hepatocyte centrilobular hypertrophy was increased in both generations
4 at 300 and/or 3500ppm. Renal nephropathy incidence was increased in F0 males and in
5 F1 males and females of the 3500 ppm group.

6 There were no BPA-related effects on adult mating, fertility or gestational indices, ovarian
7 primordial follicle counts, estrous cyclicity, precoital interval, offspring sex ratios or
8 postnatal survival, sperm parameters or reproductive organ weights or histopathology
9 (including the testes and prostate). BPA exposure had no effect on numbers of
10 implantation sites or resorptions or on mating, fertility, or gestational indices in F0 or F1
11 mice. Gestational length was increased in F0 and F1 females from the 3500 ppm group;
12 the study authors stated the effect was of unknown biological significance. Epididymal
13 sperm concentration was decreased in F0 males of the 3500 ppm group, but no effect
14 was observed in F1 parental or retained males. There was no effect on daily sperm
15 production, efficiency of daily sperm production, or sperm motility or morphology in
16 either generation. The study authors did not consider the decrease in sperm
17 concentration in F0 animals to be treatment-related, based on lack of consistency
18 between generations, no detectable effect on any other andrological endpoint, and no
19 detectable effect on fertility. Estrous cyclicity and numbers of ovarian primordial follicle
20 counts were not affected by BPA exposure in F0 or F1 females. The only gross observation
21 in reproductive organs was a slightly increased incidence of gross ovarian cysts in F0
22 females from the 3500 ppm group. The incidence of paraovarian cysts was increased in
23 F0 and F1 females from the 3500 ppm group. In F1 pups from the 3500 ppm group, body
24 weights were reduced during PND 7, 14, and 21 in F1 females and both sexes combined
25 and on PND 7 and 21 in F1 males. Preputial separation (absolute age and adjusted for
26 body weight on day of acquisition) was delayed in F1 males of the 3500 ppm group. The
27 study authors reported no gross findings in F1 or F2 weanlings. The incidence of
28 undescended bilateral testes was increased in F1 and F2 weanling males of the 3500 ppm
29 group. The incidence of hepatic cytoplasm alteration (clear hepatocellular cytoplasm,
30 slightly more basophilic cytoplasm, and/or minute vacuoles) was apparently increased in
31 F1 males from the 300 and 3500ppm groups and F1 females and F2 males from the
32 3500ppm group. The incidence of seminiferous tubule hypoplasia was increased in F1 and
33 F2 weanlings from the 3500ppm group. The study authors identified bisphenol A NOELs
34 of 30ppm (5 mg/kg b.w./day) for systemic effects, 300ppm (50 mg/kg b.w./day) for
35 developmental toxicity, and 300ppm (50 mg/kg b.w./day) for reproductive toxicity.
36 Therefore, BPA was not considered a selective reproductive or developmental toxicant in
37 mice.

38 Kobayashi *et al.* (2010) exposed C57BL/6J mice to dietary levels of 0.33,3.3 or 33 ppm
39 BPA. from GD6 through PND22, and the weanlings (F(1) and F(2)) from each F(0) and
40 F(1) dam group, respectively, dosing was continued until sacrifice. There were no
41 treatment-related changes in body weight, body weight gain, food consumption,
42 gestation length, or the number of live births on postnatal day 1 in F(0) dams between
43 the control group and BPA groups. Sex ratio and viability were similar in all F(1) pups. No
44 treatment-related changes were observed in body weight, food consumption,
45 developmental parameters, anogenital distance, or weight of any of the organs (liver,
46 kidney, heart, spleen, thymus, testis, ovary, or uterus) in F(1) and F(2) adults in either
47 sex. The epididymis weight was slightly higher with 0.33 and 3.3 ppm in F(1) males, but
48 this slight increase was neither dose dependent nor seen across generations. There were
49 no treatment-related effects of BPA on cauda epididymal sperm count or sperm motility
50 in F(1) or F(2) males. These findings indicate that dietary exposure to bisphenol A
51 between 0.33 and 33 ppm does not adversely affect reproduction or development as
52 assessed in two generations of mice.

53 Stump *et al.* (2010) conducted a developmental neurotoxicity study in Crl:CD(SD) rats
54 with dietary concentrations of 0.15, 1.5, 75, 750, and 2250 ppm daily from gestation day
55 0 through lactation day 21. F(1) offspring were evaluated using the following tests:
56 detailed clinical observations (PNDs 4, 11, 21, 35, 45, and 60), auditory startle (PNDs 20

1 and 60), motor activity (PNDs 13, 17, 21, and 61), learning and memory using the Biel
2 water maze (PNDs 22 and 62), and brain and nervous system neuropathology and brain
3 morphometry (PNDs 21 and 72). For F(1) offspring, there were no treatment-related
4 neurobehavioral effects, nor was there evidence of neuropathology or effects on brain
5 morphometry. Based on maternal and offspring body weight reductions, the no-
6 observed-adverse-effect level (NOAEL) for systemic toxicity was 75 ppm (5.85 and 13.1
7 mg/kg/day during gestation and lactation, respectively), with no treatment-related
8 effects at lower doses or nonmonotonic dose-responses observed for any parameter.
9 There was no evidence that BPA is a developmental neurotoxicant in rats, and the NOAEL
10 for developmental neurotoxicity was 2250 ppm, the highest dose tested (164 and 410
11 mg/kg/day during gestation and lactation, respectively).

12 In a preliminary study with two doses (10 µg/kg b.w./day and 5 mg/kg b.w./day) in male
13 rats, oral BPA by gavage for 6 days induced for both doses a decrease in sperm
14 production (Tiwari and Vanage 2013).

15

16 Conclusions

17 Overall, female reproductive toxicity occurred with an overall NOAEL of 50mg/kg
18 b.w./day and a LOAEL of 500 mg/kg b.w./day, derived from the Tyl *et al.* (2002)
19 multigeneration study. However, at the LOAEL for female reproductive effects, significant
20 body weight reduction and hepatic toxicity occurred. As to developmental toxicity, BPA
21 does not cause malformations or birth defects in rats or mice at levels up to the highest
22 doses evaluated: 640 mg/kg b.w./day (rats) and 1250 mg/kg b.w./day (mice) (Morrissey
23 *et al.*, 1987). BPA does not alter male or female fertility after gestational exposure up to
24 doses of 500 mg/kg b.w./day in the rat (Tyl *et al.*, 2002) and 600 mg/kg b.w./day in the
25 mouse (Tyl *et al.*, 2008), being highest dose levels evaluated. BPA does not permanently
26 affect prostate weight at doses up to 475 mg/kg b.w./day in adult rats or 600 mg/kg
27 b.w./day in mice. BPA does change the age of puberty in male or female rats at high
28 doses (ca. 500 mg/kg b.w./day). Neurodevelopmental toxicity was not observed at the
29 highest dose tested (164/410 mg/kg b.w./day, Stump *et al.*, 2010).

30

31 On the basis of the above studies, it can be concluded that BPA is essentially not a
32 specific reproductive or developmental toxicant. General toxicity effects such as body and
33 organ weights and liver histopathology and nephropathy often occur simultaneously with
34 reproductive or developmental effects, which are only observed at high dosages.

35

36 **3.9.9. Conclusions on toxicity**

37 General toxicity

38 The key studies for setting a NOAEL were considered to be the multi-generation studies
39 in rats and mice performed by Tyl *et al.* investigating the general and reproductive
40 toxicity of BPA over a wide range of oral doses (Tyl *et al.*, 2002, 2008). Based on these
41 studies, a NOAEL of 5 mg/kg b.w./day was derived based on liver toxicity, whereas the
42 NOAEL for reproductive toxicity was set at 50 mg/kg b.w./day. In these multi-generation
43 studies in rats and mice, alterations in kidney weight were also observed at the low
44 administered doses, but renal weight increased in mice and decreased in rats, although
45 the relative kidney weight also increased in rats. For the higher doses investigated in
46 both mice and rats, histopathological alterations were noted in the kidneys (Tyl *et al.*,
47 2002, 2008). Using the results of Tyl *et al.* (2002, 2008), EFSA (EFSA 2014) has recently
48 applied a BMD approach (EFSA 2009, 2011) for further refining the risk assessment with
49 kidney weight as the critical endpoint.

50 With the BMD approach a confidence interval (BMDL₁₀ – BMDU₁₀) of the BMD₁₀, being a
51 dose resulting in a 10% deviation from vehicle treated control animals, was obtained.

1 BMDL₁₀ indicates the lower part (5%) of the 90% confidence interval and BMDU₁₀
2 indicates the upper part (95%) of the confidence interval. A BMDL₁₀ of 3633 (right
3 kidney) and 3887 (left kidney) µg/kg b.w./day, and a BMDU₁₀ of 99220 (right kidney)
4 µg/kg b.w./day and 120100 (left kidney) µg/kg b.w./day was calculated for changes in
5 male mouse kidney weight based on Tyl et al. (2008). For the risk assessment, EFSA
6 used the mean value of the BMDL₁₀ results obtained for the left and right kidney resulting
7 in an established BMDL₁₀ of 3760 µg/kg b.w./day with kidney weight as the critical
8 endpoint. The BMDL₁₀ of 3.76 mg/kg b.w./day derived by EFSA is still derived for a
9 general toxicity endpoint and the result is very close to the previously used NOAEL of 5
10 mg/kg b.w./day.

11 For BPA, the two derived values (NOAEL and BMDL₁₀) are conceptually different from a
12 toxicokinetic point of view. Indeed, the internal exposure of the organs is different: the
13 hepatic exposure is presystemic, whereas the renal one is systemic. The doses at the site
14 of action (i.e. liver and kidney) differ after the oral route of exposure, because of the
15 biotransformation occurring in the liver resulting in a lower dose of free BPA for kidney
16 exposure. The SCENIHR supports the use of the kidney effects as the PoD and the newly
17 developed t-TDI for the risk assessment of medical devices.

18 Genotoxicity

19 BPA was found not to interact with DNA directly as it does not induce gene mutation in
20 bacteria (Masuda *et al.*, 2005; Tiwari *et al.*, 2012) and micronuclei *in vivo* in rodent
21 erythropoietic cells (Masuda *et al.*, 2005; Pacchierotti *et al.*, 2008; De Flora *et al.*, 2011,
22 Naik *et al.*, 2009). There was also no induction of chromosomal aberrations observed in
23 bone marrow cells of mice treated *in vivo* with BPA (Naik *et al.*, 2009), however, BPA
24 acts on the mitotic spindle apparatus. The large margin between the dose-levels found
25 negative *in vivo* for induction of aneuploidy in rodent germ cells (Pacchierotti *et al.*,
26 2008) and for induction of micronuclei in somatic bone marrow cells (Masuda *et al.*,
27 2005; Pacchierotti *et al.*, 2008; Naik *et al.*, 2009; De Flora *et al.*, 2011) provides
28 adequate reassurance on the lack of aneugenic effects of BPA *in vivo*. So, BPA is not
29 likely to pose a genotoxic hazard to humans.

30 Carcinogenicity

31 From all the study results taken together, it can be concluded that in standard
32 carcinogenic testing protocols according to OECD BPA has no carcinogenic activity. In
33 additional multigeneration studies (Tyl *et al.*, 2002; Tyl *et al.*, 2008), no indication of
34 increased cancerogenicity was observed; in particular, preneoplastic lesions of the
35 mammary gland were absent in all offspring. In contrast, three studies from the same
36 group in rats have demonstrated an effect of prenatal BPA exposure on mammary gland
37 development, i.e. ductal hyperplasia, and one study showed some carcinoma
38 development. These studies were performed with very low background estrogen levels in
39 the feed which may have had an effect on the normal development in the controls. A
40 limitation is the lack of a positive control like estradiol for comparing the estrogenic
41 effects induced by BPA. Similar effects were indicated in studies in mice and rhesus
42 monkeys, supporting the observations in rats. Therefore, it cannot be excluded that BPA
43 affects early development of mammary tissue, although their relevance for adversity in
44 humans is not clear. These studies should, therefore, be considered as an indicator for a
45 possible concern.

46 Studies using s.c. administration of BPA indicated that BPA may have the ability to
47 increase the effects of well-known carcinogens even at very low BPA levels. The studies
48 had limitations which render them unsuitable to assess whether BPA has a carcinogenic
49 potential by prenatal or peri-natal exposure. The main limitation is that in the studies
50 with positive outcome additional treatment with a strong initiating or additional
51 promoting agent(s) has been performed. Furthermore, in most of the studies the
52 statistical analysis does not consider litter effects, and in addition, multiple statistical
53 testing has been performed without proper adjustment to avoid positive results by

1 chance. Further studies were performed in transgenic animals, the results of which can
2 not be extrapolated directly to the human situation.

3 The current situation shows no carcinogenic effects in OECD guideline studies. However,
4 studies indicating effects on mammary gland development raise some concern for a
5 possible effect late in life after prenatal exposure.

6 Reproductive toxicity

7 Overall, female reproductive toxicity occurred with an overall NOAEL of 50mg/kg
8 b.w./day and a LOAEL of 500 mg/kg b.w./day, derived from the Tyl *et al.* (2002)
9 multigeneration study. However, at the LOAEL for female reproductive effects significant
10 body weight reduction and hepatic toxicity occurred. As to developmental toxicity,
11 Bisphenol A does not cause malformations or birth defects in rats or mice at levels up to
12 the highest doses evaluated: 640 mg/kg b.w./day (rats) and 1250 mg/kg b.w./day
13 (mice) (Morrissey *et al.*, 1987). BPA does not alter male or female fertility after
14 gestational exposure up to doses of 500 mg/kg b.w./day in the rat (Tyl *et al.*, 2002) and
15 600 mg/kg b.w./day in the mouse (Tyl *et al.*, 2008, highest dose levels evaluated). BPA
16 does not permanently affect prostate weight at doses up to 475 mg/kg b.w./day in adult
17 rats or 600 mg/kg b.w./day in mice. BPA does change the age of puberty in male or
18 female rats at high doses (ca. 500 mg/kg b.w./day). Neurodevelopmental toxicity was
19 not observed at the highest dose tested (164/410 mg/kg b.w./day, Stump *et al.*, 2010).

20 On the basis of the above studies, it can be concluded that BPA is not a specific
21 reproductive or developmental toxicant. General toxicity effects such as body and organ
22 weights and liver histopathology and nephropathy often occur simultaneously with
23 reproductive or developmental effects, which are only observed at high dosages.

24 Immunotoxicity

25 BPA is able to elicit skin sensitization in humans probably because it is a weak sensitiser.
26 Studies on a possible relationship between prenatal and/or postnatal BPA exposure and
27 allergic responses are not consistent. Other studies on immunotoxic responses are
28 insufficient to draw final conclusions.

29 Metabolic effects

30 Several studies in laboratory animals published in the last 5 years and more recently
31 directly addressed whether developmental exposure to BPA can affect adiposity, glucose
32 or insulin regulation, lipid profiles or other endpoints related to diabetes or metabolic
33 syndrome. Effects were increased body weight, elevated serum insulin and impaired
34 glucose tolerance in adult offspring. There is inconsistency in the results as effects were
35 observed in some studies only in male offspring while in other studies effects were only
36 observed in female offspring. In addition, effects were not consistently induced by similar
37 dosages. BPA exposure also affected various metabolic endpoint in adult rodents exposed
38 to BPA. In some of the studies, the findings could be taken as evidencing a non-
39 monotonic dose-response as effects were seen at a lower dose which was not observed in
40 higher doses. However, effects were seen only at one dose level. There are no studies
41 which demonstrate effects of different effect size at two dose levels and no or a reduced
42 effect at a higher dose, thus corroborating the existence of non-monotonicity.
43 Additionally, epidemiological studies do not show unequivocally conclusive evidence for
44 metabolic effects of BPA. Although no firm conclusion can be drawn at present, the data
45 warrant further assessment of the potential effects of BPA on adiposity, glucose or insulin
46 regulation, lipids and other endpoints related to diabetes or metabolic syndrome.

47 *In vitro* BPA was found to increase cellular insulin secretion only at high glucose levels,
48 whereas at low glucose levels a high BPA exposure was needed. In addition, lipid droplet
49 accumulation was induced by BPA in human adipose tissues at relative high
50 concentrations. These high concentrations could also induce cytotoxicity and apoptosis of
51 the cells.

1 BPA is a chemical that has been investigated in studies performed according to OECD
2 protocols and compliant to GLP principles. The array of studies performed is such as
3 requested for a high production volume chemical according to the REACH legislation plus
4 one neurotoxicity study as requested for pesticides. In these studies, the lowest NOAEL
5 (5 mg/kg b.w./day orally) was found in a developmental study in rats (Tyl *et al.*, 2002)
6 as an effect on the liver. Centrilobular hepatocyte hypertrophy was also seen in the 3-
7 generation study in mice (Tyl *et al.*, 2008) at an oral dose of 50 mg/kg b.w./day. Other
8 effects in the same study were increased kidney weight and nephropathy. No
9 developmental and no fertility endpoint other than reduced sperm concentration at the
10 highest dose was changed in this study which investigated oral doses of 0.003, 0.03, 0.3,
11 5, 50, or 600 mg BPA/kg b.w./day. No carcinogenicity was observed in a classical NTP
12 study. The results of genotoxicity testing were grossly negative. Testing for immunotoxicity
13 revealed some effects; however, without indicating that BPA is clearly an immunotoxic
14 substance. New studies with "untypical" endpoints have raised concerns. The endpoints
15 encompass cell proliferation in the male and female breast after intrauterine and postnatal
16 exposure, anxiety and behavioural endpoints also after intrauterine and postnatal
17 exposure and changes in metabolic endpoints also after intrauterine and postnatal
18 exposure. The doses which elicit those effects are much lower than 5 mg/kg b.w./day
19 and in some studies given only once. At present, it is under discussion whether the
20 observations are real effects and what the meaning of the observations is with regard to
21 the adversity in humans. However, there is the possibility that BPA may have NOAEL in
22 "untypical" endpoints which may be as low as several µg/kg b.w./day orally and even
23 below 1 µg/kg b.w. when given by the subcutaneous route.

24 Overall conclusions

25 In conclusion, there are several indications that BPA has biological effects below the
26 current NOAEL of 5 mg/kg b.w./day and the recently established BMDL₁₀ of 3.76 mg/kg
27 b.w./day (oral repeated exposure). However, the evidence has been mainly obtained in
28 dedicated studies focussing on specific outcome parameters like adiposity and hormone
29 levels, and not in general toxicity studies. Some of those parameters resulted in
30 contradicting results in various studies (e.g. decrease, no effect or increase in body
31 weight). In addition, dose-response relationships could not be established. There is a
32 possible concern for prenatal BPA exposure and an effect on mammary gland
33 development. In addition, the effects on the metabolism and adiposity needs further
34 investigation in large scale studies with a wide dose range of BPA.

35

36 **3.10. Epidemiological studies**

37 Studies

38 There are a limited but increasing number of epidemiological studies that investigated an
39 association between BPA exposure and health outcomes. Most of them use cross-
40 sectional designs which limit their interpretability, especially for outcomes that have long
41 latency periods (e.g. cardiovascular disease, diabetes). Frequently, a single measure of
42 urinary BPA is used to categorize exposure, which given the short half-life of BPA, is
43 another limitation. Fortunately, many of those epidemiological studies utilized the same
44 laboratory at the United States Centers for Disease Control and Prevention for
45 quantification of urinary BPA concentrations (Wolff *et al.*, 2007, 2008b, 2010; Lang *et al.*,
46 2008; Braun *et al.*, 2009; Mok-Lin *et al.*, 2009; Meeker *et al.*, 2010a; Meeker *et al.*,
47 2010b; Melzer *et al.*, 2010, 2011, 2012; Mendiola *et al.*, 2010; Clayton *et al.*, 2011;
48 Carwile and Michels 2011; Silver *et al.*, 2011; and Shankar *et al.*, 2012a,b,c). This
49 eliminates one potential source of variability in comparisons across these studies.

50 We have identified 34 peer-reviewed epidemiological studies that examined associations
51 between BPA exposure and human health outcomes.

52 Occupational and non-occupational exposure to BPA was investigated in relation with
53 some reproductive outcomes, including serum sex steroid hormone concentrations,

1 semen quality, oocyte count, recurrent miscarriage, endometriosis, endometrial
2 hyperplasia and cancer, and polycystic ovarian syndrome (Hanaoka *et al.*, 2002; Hiroi *et al.*,
3 *et al.*, 2004; Takeuchi *et al.*, 2004; Sugiura-Ogasawara *et al.*, 2005; Itoh *et al.*, 2007;
4 Cobellis *et al.*, 2009; Mok-Lin *et al.*, 2009; Galloway *et al.*, 2010; Li *et al.*, 2010a,b,c;
5 Meeker *et al.*, 2010a; Meeker *et al.*, 2010b; Mendiola *et al.*, 2010; Bloom *et al.*, 2011
6 and Hao *et al.*, 2011).

7 Interestingly, three epidemiological studies investigated the association of urinary BPA
8 concentrations with semen quality. Men who were partners of pregnant women in the
9 USA (Mendiola *et al.*, 2010), male partners in infertile couples who were patients in an
10 infertility clinic (Meeker *et al.*, 2010) and workers with occupational exposure to BPA in
11 China (Li *et al.*, 2010c). Although all three studies, with a relatively modest sample size
12 (ranging from 190 to 302 men), reported associations of increased urinary BPA
13 concentration and one or more measures of reduced semen quality, this was statistically
14 significant in only one of them. Limitations include their cross-sectional designs and
15 incomplete assessment of occupational co-exposure in one of the three studies.

16 The evidence for an association of BPA with altered age of pubertal onset in girls was
17 investigated in two epidemiological studies, a cross-sectional study in New York City,
18 New York, USA (Wolff *et al.*, 2008a) and in a prospective cohort study of 1151 female
19 children from Cincinnati, Ohio, San Francisco, California, and New York City, New York,
20 USA (Wolff *et al.*, 2008a, 2010). Results are limited and inconsistent. Research needs to
21 include large prospective studies on the association of BPA with pubertal development. A
22 research gap is the lack of studies on male pubertal development in relation to BPA
23 exposure.

24 Only one study examined the association between BPA exposure and cancer (Yang *et al.*,
25 2009). In a breast cancer case-control study of 152 women, serum samples were used
26 to quantify BPA exposure. Although cases had higher median serum BPA concentrations
27 than controls, differences were not statistically different. Because BPA has a short half-
28 life, current serum BPA concentrations may not be relevant to the etiological window of
29 development for breast cancer, which is years to decades before clinical recognition.

30 It is difficult to draw any conclusions from two published epidemiological studies that
31 have examined the association of BPA with perinatal outcomes because contradictory
32 results. Six published epidemiological studies have examined the association of BPA with
33 perinatal outcomes, body mass index and neurodevelopment. Two studies examining
34 perinatal outcomes relied on a single serum measure of BPA at birth (Padmanabhan *et al.*,
35 2008; Chou *et al.*, 2011); others relied on a single urinary BPA concentration during
36 pregnancy (Wolff *et al.*, 2008b; Philipat *et al.*, 2012), another estimated BPA exposure
37 by personal air sampling measurements and exposure history. Wolff and colleagues
38 (Wolff *et al.*, 2008b) found that urinary BPA concentrations in pregnant women in the
39 third trimester were associated with modest elevations (although not statistically
40 significant) in birth weight. Philipat *et al.* (2012) found that head circumference increased
41 in association with BPA increased concentrations. There is only one cross-sectional pilot
42 study examining the association of urinary BPA concentration with body mass index
43 (Wolff *et al.*, 2007). Chou *et al.* (2011) who measured BPA in maternal blood and
44 umbilical cord blood found elevated prenatal BPA exposure increased the risk of low birth
45 weight, smaller size for gestational age and adverse actions of adipokines in neonates,
46 especially in male infants. Although these results could suggest evidence that maternal
47 exposure may be correlated with adverse birth outcomes, most of these studies are
48 cross-sectional, relied on a single measure of exposure or did not adequately adjust for
49 important potential confounders.

50 Only one prospective cohort study had examined the relationship of serial BPA urinary
51 concentrations in pregnant women with neurobehavioural outcomes (Braun *et al.*, 2009;
52 2011). This study found a positive association between urinary BPA concentrations
53 measured during pregnancy and externalizing behaviours (i.e. aggression and
54 hyperactivity). In the follow-up of 3-year-old children, the investigators found gestational

1 BPA exposure to affect behavioural and emotional regulation domains at 3 years of age,
2 especially among girls.

3 Six cross-sectional analyses of data from the United States National Health and Nutrition
4 Examination Survey (NHANES) reported associations of BPA exposure with self-reported
5 diagnosis of pre-existing cardiovascular disease, hypertension, obesity and diabetes
6 (Lang *et al.*, 2008; Melzer *et al.*, 2010, 2011; Carwile *et al.*, 2011; Silver *et al.*, 2011;
7 Shankar *et al.*, 2012a,b,c). Two other studies in US (Metlzer *et al.*, 2012) and China
8 (Wang *et al.*, 2012) reported an association between BPA exposure and coronary disease
9 at the time of diagnosis and obesity and insuline resistance, respectively. In addition, a
10 study found associations between urine BPA and immune function and allergy (Clayton *et al.*,
11 2011). These cross-sectional analyses have several important weaknesses that limit
12 their interpretation. A major limitation is the use of a single spot urine sample that
13 reflects recent BPA exposure only (past several hours) and may not adequately measure
14 BPA exposure during the relevant etiological window for cardiovascular disease and
15 diabetes, which might be years or decades earlier.

16 Strong conclusions based on cross-sectional analyses are not possible. Prospective
17 studies with serial exposures to BPA assessed during etiologically relevant windows,
18 years before development of disease, are needed. Additional studies, especially of a
19 longitudinal design with repeated BPA measurements, are needed to further elucidate
20 these associations.

21 Casas and co-workers (Casas *et al.*, 2013) pointed out that although there is little
22 published data in mother-child cohorts, many measurements are ongoing (Kasper-
23 Sonnenberg *et al.*, 2012) and they recommend that cohorts start working towards
24 combined and comparison studies. Recommendations for further data collection on BPA
25 include: i) a better evaluation of exposure to BPA in children; ii) repeated measurements
26 of BPA; iii) validation and harmonisation of questionnaires, and iv) detection methods
27 and measurement of BPA. Furthermore, evaluation of mother child cohorts is needed to
28 gain insight in the relation between BPA exposure and effects in children.

29 Recently, Maserejian and coworkers (2012) investigated whether greater exposure to
30 dental composites is associated with psychosocial problems in children. They performed
31 an analysis of treatment-level data from the New England Children's Amalgam Trial, a 2-
32 group randomized safety trial comparing amalgam with the treatment plan of bisphenol
33 A-glycidyl methacrylate (bisGMA)-based composite and urethane dimethacrylate-based
34 polyacid-modified composite (compomer), among 534 children aged 6 to 10 years at
35 baseline. They found that children with higher cumulative exposure to bisGMA-based
36 composite had poorer follow-up scores on 3 of 4 BASC-SR global scales: Emotional
37 Symptoms, Clinical Maladjustment, and Personal Adjustment. Associations were stronger
38 with posterior-occlusal (chewing) surfaces, where degradation of composite was more
39 likely. They concluded that greater exposure to bisGMA-based dental composite
40 restorations as potential source of BPA was associated with impaired psychosocial
41 function in children, whereas no adverse psychosocial outcomes were observed with
42 either urethane dimethacrylate-based compomer or amalgam treatment levels.

43 Conclusions

44 Conclusions valid for the risk assessment based on cross-sectional analyses are not
45 possible. In addition, many of the available cross-sectional analyses have several
46 important weaknesses that limit their interpretation. The major limitation is the use of a
47 single spot urine sample that reflects recent BPA exposure only (past several hours) and
48 may not adequately measure BPA exposure during the relevant etiological window for
49 cardiovascular disease and diabetes, which might be years or decades earlier. However,
50 also based on the outcome of animal studies, some effects like neurobehavioral
51 outcomes, even when observed in one study, need further investigation for confirmation
52 of negation of the observed effects.

53 There is a need for further clarification and interpretation of the relationship between BPA
54 exposure and adverse health effects. Prospective studies with serial exposures to BPA

1 assessed during etiologically relevant windows, years before development of disease, and
2 thus prolonged follow up periods are needed.

3 Specific recommendations for use of existing data include i) the development of
4 conversion models for the different media used for measurement of BPA, ii) and inter-
5 laboratory comparisons and calibrations.

6 Recommendations for further data collection on BPA include: i) a better evaluation of
7 exposure to BPA in children; ii) repeated measurements of BPA; iii) validation and
8 harmonisation of questionnaires; and iv) detection methods. Additionally, evaluation of
9 mother child cohorts is needed to gain insight in the relation between BPA exposure and
10 effects in children.

11

12

3.11. Alternatives to BPA currently use

13 Some chemicals, similar to BPA, are considered to be able to partially replace BPA in the
14 industrial applications, and, therefore, used in the manufacture of resins and plastics. An
15 example is bisphenol-S [bis(4-hydroxyphenyl)sulfone, (BPS)] whose two phenolic rings
16 are joined together with sulfur. The material containing BPS is of interest in the
17 preparation of high temperature resistant thermosetting thermoplastic polymers
18 (Spitsbergen *et al.*, 1971). Epoxy resin based on BPS has the advantage of resistance to
19 deformation by heat and thermal stability. Such improved epoxy resins have other
20 advantages in briefer gel periods and more rapid development of mechanical properties
21 in cured systems, better resistance to organic solvent attack, increased dimensional
22 stability and better wetting of glass reinforcement. BPS is commonly used as a monomer
23 in the production of epoxy resins (Rwei *et al.*, 2003), cyclic carbonates (Kim *et al.*,
24 2001), and sulphonated poly(ether ketone ether sulphone) (Changkhamchom and Sirivat
25 2010). It is also an important chemical additive in pesticides, dyestuffs, colour-fast
26 agents, leather tanning agents, dye dispersants, and fiber improvers.

27 To date, BPS replaced BPA as a developer in dyes for thermal paper in Japan (Watanabe
28 *et al.*, 2004) and China (Liu, 2005). Therefore, the production and demand for BPS
29 increases year by year. Resultantly, BPS could be a widespread environmental pollutant
30 in future as well as BPA. Even more so, it has been found that BPS is much less
31 biodegradable than BPA (Ike *et al.*, 2006). In this study of eight bisphenol compounds,
32 BPS was the most persistent. Recently, BPS was also detected in canned food (Viñas *et al.*,
33 2010). Although it has not been studied as much as BPA, preliminary studies show
34 that it shares hormone-mimicking properties as well (Hashimoto *et al.*, 2001; Chen *et al.*,
35 2002; Kuruto-Niwa *et al.*, 2005; Kitamura *et al.*, 2005). However, studies on the
36 endocrine disrupting properties of BPS have focused on its interaction with human
37 estrogen receptor alpha (hER α). Recently, interactions of BPS with other nuclear
38 receptors were also reported (Molina-Molina *et al.*, 2013). Several alternatives for BPA
39 were investigated including BPS, BPF and halogenated BPA derivatives
40 tetrachlorobisphenol A (TCBPA) and tetrabromobisphenol A (TBBPA) for their *in vitro*
41 interaction with several nuclear receptors (e.g. estrogen receptor α , estrogen receptor β ,
42 androgen receptor, and pregnane X receptor). Although some differences were noted, all
43 nuclear receptors investigated were activated by one or more of the bisphenol
44 alternatives. BPS, BPF and BPA effectively activated both estrogen receptors, whereas
45 BPA, TCBPA and TBBPA were pregnane X receptor agonists. Relative to BPA. the
46 alternatives BPS and BPF and TCBPA and TBBPA showed reduced endocrine activity in the
47 *in vitro* assays used.

48 Bisphenol-F, [bis(4-hydroxyphenyl)methane, (BPF)], which has no substituent at the
49 bridging carbon, has a broad range of industrial applications. The BPF monomer is
50 polymerized to prepare the epoxy resins and polycarbonates used to manufacture
51 lacquers and varnishes, coatings, adhesives plastics, and other products (Jana *et al.*,
52 2005). BPF was detected in environmental samples (Fromme *et al.*, 2002; Stachel *et al.*,
53 2003) and several reports have confirmed its estrogenic effect using various *in vivo*
54 (Yamasaki *et al.*, 2002) and *in vitro* assays (Hashimoto and Nakamura, 2000; Hashimoto

1 *et al.*, 2001; Cabaton *et al.*, 2009). Moreover, anti-androgenic activity of BPF has also
2 been observed in several human recombinant cell lines carrying hAR (Sato *et al.*, 2004;
3 Cabaton *et al.*, 2009).

4 Like BPA, both BPS and BPF are also an emerging group of environmental contaminants
5 (Fukazawa *et al.*, 2001; de Wit *et al.*, 2010) and interact with and disrupt thyroid
6 hormone receptor signaling (Kitamura *et al.*, 2002). In addition, TBBPA and TCBPA are
7 potent peroxisome proliferator-activated receptor gamma (PPAR γ) agonists (Riu *et al.*,
8 2011).

9

10 **3.12. Recommendations for research**

11 General

12 For several endpoints like effects on metabolism, neurobehavioral effects, and effects on
13 mammary gland development, the reported studies indicate that BPA exposure may
14 affect these endpoints in animals. However, the overall evidence is equivocal and
15 sometimes based on limited studies. Especially low dose potentially non-monotonic
16 effects are very difficult to identify as such and need further confirmation. Therefore,
17 using a weight of evidence approach, as formulated in the conclusions of the various
18 sections, it was concluded that the evidence was not substantiating the suggested
19 adverse health effects. Therefore, recommendations were formulated for further
20 clarification of these issues.

21 Exposure

22 This is the area in which more and better information is needed, regarding the
23 composition and the release of BPA from medical devices in the actual use conditions. For
24 sterilization of medical devices, it is known that steam sterilization may result in release
25 of BPA from PC medical devices. Whether ethylene oxide (EtO) sterilization induces
26 release of BPA from PC or PSU medical devices is yet unknown. Research into the use
27 and consequences of EtO sterilization with regard to BPA release is also recommended.

28 Hazard

29 Currently a series of studies is being performed with US public grants investigating some
30 of the issues dealing with BPA exposure (Shelnutt *et al.*, 2013). A two year chronic study
31 design is used conducted under GLP guidelines as the core study. Various investigators
32 will receive at various times designated animals or animal tissues for testing and
33 analysis. This approach is chosen to bridge between regulatory GLP studies and more
34 dedicated experimental scientific studies. This programme addresses some of the
35 concerns and controversies regarding BPA adverse effects, in particular non-monotonicity
36 of dose-response and possible low dose effects. Some of the presented research
37 recommendations will probably be overcome by this extensive US research program
38 (Shelnutt *et al.*, 2013). Even when the data analysis will need time, the results from such
39 a coordinated research effort would provide good evidence for the remaining data gaps.

40 There are several indications that BPA does have biological effects below the current
41 NOAEL of 5 mg/kg b.w./day and the recently calculated BMDL₁₀ of 3.76 mg/kg b.w./day
42 (oral repeated exposure). However, the evidence has been mainly obtained in dedicated
43 studies focussing on specific outcome parameters like adiposity and hormone levels, and
44 not in general toxicity studies. Some of those parameters resulted in contradicting results
45 in various studies like a decrease, no increase or increase in weight. Additionally, dose-
46 response relationships could not be established. There is a possible concern for prenatal
47 BPA exposure and an effect on mammary gland development. In addition, the effect on
48 the metabolism and adiposity needs further investigations in large scale studies with a
49 wide dose range of BPA.

50 Although effects on the immune system are suggested the data are insufficient to draw
51 final conclusions on the immunotoxicity of BPA. In view of these suggested effects of BPA

1 on the immune system further investigations to the potential immunotoxicity of BPA are
2 warranted.

3 Some of the above mentioned effects warrant further investigation for confirmation or
4 negation. The currently performed study by the FDA's National Center for Toxicological
5 Research (NCTR) in the USA with animals under a strict exposure regimen and the
6 studies to be conducted on these animals by various research groups may clarify some of
7 these controversial issues and give indications for specific further research priorities.

8 There is a need for further clarification and interpretation of the relationship between BPA
9 exposure and adverse health effects in man. Prospective epidemiological studies are
10 needed with serial exposures to BPA assessed continually during etiologically relevant
11 windows, years before development of disease, and thus prolonged follow up periods are
12 needed.

13 Recommendations for further prospective epidemiological data collection include: i) a
14 better evaluation of exposure to BPA in children; ii) repeated measurements of BPA; iii)
15 validation and harmonisation of questionnaires. Additionally, evaluation of mother child
16 cohorts is needed to gain insight in the relation between BPA exposure and effects in
17 children. It has been suggested (Casas *et al.*, 2013) that for mother-child cohorts, many
18 measurements are already ongoing.

19

20 **4. OPINION**

21

22 **Background**

23 Currently many scientific discussions are ongoing on the possible adverse effects of BPA.
24 The exposure of the population is mainly via food as a result of the use of BPA in food
25 packaging. More specifically safety concerns have been expressed for vulnerable groups
26 such as infants, pregnant and breast-feeding women exposed to BPA through other
27 products. Medical devices are a specific product category in which BPA is often found.
28 Examples include implants, catheters, and most dental devices. Some BPA-containing
29 medical devices may have direct and/or indirect contact with the patients (e.g.
30 hemodialyzer apparatus, filters, bypasses, tubing, pumps, instruments, surgical
31 equipment, blood pathway circuits and respiratory tubing circuits). These products are
32 used on all types of patients (e.g. adults, children). Therefore, an Opinion was asked from
33 the SCENIHR regarding the use of BPA in medical devices. This Opinion describes the risk
34 assessment of exposure to BPA via medical devices, for which the exposure routes are
35 not limited to oral applications.

36

37 **What is BPA?**

38 Bisphenol A [Bis(4-hydroxyphenyl)propane], BPA is a high-production volume industrial
39 chemical. BPA is a key building block of polycarbonate plastic and a precursor for the
40 manufacturing of monomers of epoxy resins. Polycarbonate is used in a wide variety of
41 products including medical devices, for its balance of toughness, dimensional stability
42 optical clarity, high heat resistance and electrical resistance. In addition to polycarbonate
43 medical devices, various dental materials are fabricated from monomers such as
44 bisphenol A glycidyl methacrylate (Bis-GMA) and bisphenol A dimethacrylate (Bis-DMA)
45 derived from BPA. BPA-resins are also used in inks and adhesives. In addition to BPA
46 itself, polymers produced using BPA like polysulfone (PSU) that are used in medical
47 devices are also considered because they can release BPA. For example, the BPA derived
48 polymer polysulfone (PSU) is used as membrane in hemolysis dialyzers.

49

50 **Previous risk assessments**

1 In the existing evaluations, the following conclusions have been drawn for oral route of
2 exposure to BPA:

- 3 • No Observed Adverse Effect Level (NOAEL) of 5 mg/kg b.w./day in rats and mice
- 4 • Tolerable Daily Intake (TDI) of 50 µg/kg b.w.
- 5 • developmental toxic effects only observed at doses with severe maternal toxicity
- 6 in rats and mice
- 7 • an overall NOAEL for reproductive toxicity of 50 mg/kg b.w./day in rats and mice
- 8 • in terms of toxicokinetics there is a difference between rats and humans (the
- 9 latter presenting a shorter half-life) as well as between the oral and the parenteral
- 10 route of exposure.
- 11 • due to the first pass effect, after oral uptake, the systemic exposure to free BPA is
- 12 a small fraction of the external dose in all species.
- 13 • there are still unresolved issues in the risk assessment of BPA after oral uptake.
- 14

15 More recently EFSA established a temporary (t)-TDI of 5 µg/kg b.w./day for oral
16 exposure to BPA (EFSA 2014). For the establishment of this t-TDI, a bench mark dose
17 (BMD) evaluation was used with the BMDL₁₀ of 3.76 mg/kg b.w./day for kidney
18 alterations as the critical effect.

19 The main focus of these evaluations was on the oral route of exposure. Especially for
20 medical devices manufactured from polycarbonate plastics, other exposure routes such
21 as subcutaneous and intravenous (e.g. during hemodialysis) are important.

22

23 **General exposure**

24 The human population is exposed to BPA through the diet, while air, dust, water, and skin
25 contact primarily through thermal paper are other possible sources of exposure.
26 Bisphenol A in food and beverages accounts for the majority of daily human exposure.
27 BPA exposure results from either the release of non-polymerized monomers or from the
28 slow decay of polymer bonds in polycarbonate leading to monomer release into proximal
29 foods and liquids. A number of studies in various countries have indicated that the vast
30 majority of the population (91–99%) does have detectable levels of BPA-conjugates in
31 urine. The measured BPA levels reflect the recent exposure of the past several hours
32 before the sample collection as there is a rapid conjugation and short elimination half-
33 time of a few hours of BPA in blood.

34 Notably, regarding BPA determination, the analytical method used to detect both the
35 parent compound and its metabolites is crucial especially at the low levels expected in
36 biological samples. The sampling and analytical methods used, therefore, can represent a
37 relevant source of differences among available studies.

38 In urine, BPA is present mainly in its conjugated form. Urinary biomonitoring data
39 provide information on the internal dose, which is the result of total BPA exposure,
40 independently from the sources. Therefore, biomonitoring data in urine account not only
41 for dietary exposure, but also for non-food sources (e.g. medical devices, dust, thermal
42 and other kind of papers). Since BPA urinary excretion is almost complete within 24
43 hours after exposure and due to the less invasively sampling, urine is the matrix of
44 choice for assessing daily exposure to BPA in humans. Blood concentrations of total BPA
45 (free plus conjugates) determined at one time point are not representative of an average
46 exposure, because it is strongly dependent on the time of blood sampling with respect to
47 the exposure time.

48 On the basis of available biomonitoring and exposure data, it was recently concluded that
49 the exposure to BPA from non-food sources that some authors hypothesized as being
50 potentially relevant sources, is generally lower than that from exposure from food by at
51 least one order of magnitude for most studied subgroups. Dietary exposure was indeed
52 estimated to contribute for more than 90% to the overall BPA-exposure for non-
53 occupationally exposed individuals (Geens *et al.*, 2012; EFSA, 2013; ANSES, 2013) and

1 exposure through dust ingestion, dental surgery and dermal absorption from thermal
2 paper accounted for less than 5%. However, the contribution due to medical devices has
3 never been taken into account.

4 EFSA (2013) estimated the BPA exposure due to dietary uptake of BPA. The highest
5 exposure for children older than 6 months and up to 10 years of age was 857 ng/kg
6 b.w./day and for infants days 1-5 after birth 495 ng/kg b.w./day. For adults a highest
7 exposure of 388 ng/kg b.w./day was estimated.

8 Skin absorption

9 The available data indicate that at the estimated exposures, BPA penetrated rapidly into
10 the skin by passive transfer at a percentage between 10% and up to 47% of the applied
11 dose. The possible skin metabolism is controversial, since contrasting results were
12 reported; therefore, excluding a pre-systemic BPA clearance due to dermal
13 biotransformation, as a worst-case a systemic bioavailability equal to 30 % of the applied
14 dermal dose can be used for risk assessment purposes.

15 SC exposure/administration

16 Subcutaneous administration resulted in much higher free BPA levels compared to the
17 oral administration. However, differences in circulating free BPA after subcutaneous and
18 oral administration can disappear within two hours as demonstrated in a study in rats.

19 IV administration

20 After intravenous administration a rapid distribution to organs and rapid clearance from
21 blood was described. Initial high serum levels of free BPA may partly distribute and
22 sequester into fatty tissues. BPA was eliminated from adipose tissue at a rate similar to
23 that for BPA conjugates in the whole organism indicating the non persistent nature of
24 BPA. Free BPA was no longer detectable in serum of mice at 8h after i.v. administration

25 Inhalation

26 No information was available for inhalation exposure that might occur after intubation for
27 inhalation support in intensive care units. However, in vitro studies showed a lack of
28 conjugation of BPA by lung cells.

29 For risk assessment purposes, the bioavailability of free BPA is crucial as this is the active
30 compound. However, data on both free and conjugated BPA are required to assess the
31 exposure and fate of BPA.

32

33 **Exposure from medical devices**

34 Medical devices based on polycarbonate and polysulfone, due to their chemistry, can
35 contain BPA residues whereas others like PVC may or may not contain BPA residues
36 depending on their production method. In addition, some other BPA-derivatives (such as
37 epoxy resins) are used specifically in dental materials. The major factor influencing the
38 residual amount of BPA levels is the employment of incorrect operating conditions during
39 the processing step. Moreover, breakdown or hydrolysis of the polycarbonate polymer
40 after manufacturing can occur, thus giving rise to the free monomer from the polymer
41 available for exposure. In polycarbonate articles used for food contact, the residual
42 content is usually less than 10 µg/g of polycarbonate (ECB, 2003).

43 Exposure can be estimated by either measuring the BPA content of the medical devices
44 or by extraction assays for potential release. Extraction of BPA was much more
45 prominent in aqueous ethanol (17.2% v/v) and bovine serum (mimicking human serum)
46 than in water. For PC casings of hemodialyzers and hollow fibres used in hemodialyzers
47 extracted amounts of BPA were ranging from 0.2 – 12.2 mg/kg. Under simulated use
48 conditions release in bovine serum was up to 2090 ng/dialyzer, and in aqueous ethanol
49 (17.2% v/v) up to 4299 ng/dialyzer. For dental materials the leakage is limited to resins
50 composed of Bis-DMA (Bisphenol A dimethacrylate) which has an ester linkage that can

1 be hydrolysed to BPA, whereas the ether linkage in Bis-GMA (Bisphenol A glycidyl
2 methacrylate) was found to be stable.

3 Little information concerning BPA exposure resulting from the use of medical devices, is
4 available. For the placing of dental composite resin restorations, measurements have
5 shown the release of BPA mainly during the few hours directly after application. Values
6 measured were up to 30 µg/mL saliva, and 931 µg in total saliva volume produced.
7 Calculations based on the maximum values of BPA found in fissure sealants and in
8 composite materials, in combinations with the actual amount of material used in clinical
9 practice and a median 4-year life-time of a composite restoration, suggest a maximum
10 exposure of 0.06 µg BPA/day from fissure sealants, and a maximum exposure of 0.36 µg
11 BPA/day from composite restorations. Contact with dental materials gave an estimated
12 short-term (<24 hours) exposure of 140 to 200 ng/kg body weight per day for children
13 and adults, respectively. These BPA releases contribute to the oral exposure to BPA and
14 are included in the biomonitoring studies to the total exposure to BPA as mentioned
15 above.

16 Measurements in dialysis patients found BPA values up to 6.6 ng/mL blood. In
17 prematurely born infants undergoing intensive therapeutic medical interventions for BPA
18 geometric mean urinary concentration of 30.3 µg/L was observed with the highest value
19 measured 946 µg/L, which was about ten times higher than that among children 6-11
20 years old. More than 90% of the BPA detected in the urine of the prematurely born
21 infants was in its conjugated (e.g. glucuronide, sulfate) form.

22 Taking into account the many possible sources of exposure of patients during hospital
23 care and the scarcity of information related to release of BPA from medical devices, six
24 critical exposure scenarios were evaluated to estimate potential exposure to BPA from
25 medical devices (Table 6). The highest exposures estimated occurred during prolonged
26 medical procedures in infants (685 ng/kg body weight per day) and exposure of
27 prematurely born infants in NICU (3000 ng/kg body weight per day).

28 The use of medical devices consisting of BPA containing PVC for treatment of adults
29 (1000 ng/kg b.w./day), and treatment of prematurely born infants (7000 ng/kg body
30 weight per day, 7 µg/kg body weight per day) also results in potential high exposures.
31 Short-term exposure via medical devices consisting of BPA containing PVC might even be
32 higher (adults up to 5000 ng/kg b.w./day, infants up to 12000 ng/kg b.w./day).
33 However, it is worth noting that exposure to BPA via BPA-containing PVC has been
34 estimated based on extrapolation from data on phthalate leakage from PVC and are,
35 therefore, affected by a high degree of uncertainties.

36 Some of the estimated BPA exposures due to medical devices are in the same range as
37 exposure via the food (EFSA 2013). EFSA estimated the exposure to be highest for
38 infants and toddlers among the population older than 6 months, with the estimated
39 average of 375 ng/kg b.w./day and a highest estimated dietary exposure of 857 ng/kg
40 b.w./day. The modeled dietary exposure for teenagers, adults and the elderly ranged
41 from 116 to 159 ng/kg body weight per day for average exposure, with a high exposure
42 ranging from 341 to 388 ng/kg body weight per day.

43

1 Table 6. BPA exposure from medical devices as estimated for various use scenarios.

Exposure scenario	BPA exposure estimation in ng/kg b.w./day			
	Prematurely born infant	infant	child	adult
External contact with a MD containing BPA (short-term)	1			0.08
Contact with dental material (short-term)	na	na		200
(long-term)	na	na	2	6
Contact with orthodontic equipment (short-term)			140	140
(medium-term)			13.5	7.5
(long-term)			12	6
Contact with an implant (medium-term)			11	6
(long-term)			0.8	0.4
Hemodialysis (long-term)				57
Prolonged surgical procedures (short-term)		685	114	57
Prolonged exposure to different sources of BPA in intensive care units (medium-term)	3000			
Breast pump and collection vessel made of PC (medium-term)		134		
Uses of PVC (short-term)	12000			5000
(long-term)	7000			1000

2

3 BPA metabolism and toxicokinetics in humans

4 The unchanged parent BPA is the toxic species, which is readily detoxified in the body.
5 The major BPA metabolite in human is BPA-glucuronide, which is quantified in plasma
6 and rapidly excreted in the urine; BPA-sulphate was also detected after oral exposure as
7 a minor urinary metabolite. After oral exposure there is a very fast first pass effect in the
8 liver that results in very small amounts of unchanged parent BPA, up to 9.5% of the oral
9 administered dose is recovered as non-conjugated BPA in human urine. In humans, a
10 polymorphism exists for the conjugation of BPA. However, the polymorphism was found
11 to results in a limited level of variability of BPA conjugation as indicated by biomonitoring
12 studies. Therefore, it can be considered that the default value used to account for kinetic
13 interindividual variability within the general population (IPCS, 2006), can cover

1 differences due to polymorphically expressed enzyme activity involved in BPA
2 metabolism.

3 In humans, both low and high single oral doses of BPA are well absorbed (>90%). This is
4 a conservative estimate for neonates. The half-life of BPA in humans is very short,
5 ranging from 1 to 3.5 hours, and because of high first-pass metabolism in the liver the
6 systemic availability is expected to be low. Based on the analysis of oral versus
7 intravenous toxicokinetic data, the oral systemic bioavailability of unconjugated BPA is
8 2.8%, 0.2%, 0.9% and less than 1% in rats, mice, monkeys, and dogs respectively. The
9 systemic availability of unconjugated BPA in humans has not been evaluated
10 experimentally, however, controlled biomonitoring studies indicated that internal
11 exposure in humans to unconjugated BPA is very low (1-10%).

12 Studies on toxicokinetics of BPA available to date in animals have demonstrated a
13 significantly lower internal exposure to free BPA after oral intake as compared to
14 parenteral exposure. This is essentially due to the highly efficient pre-systemic
15 conjugation to glucuronides and sulfate which occurs mainly in the liver and partially in
16 the gut after oral administration independently of the species. Thus, the internal
17 exposure to free BPA after oral intake is lower as compared to dermal or parenteral
18 exposure, although also for these latter routes of exposure the metabolization in the liver
19 quickly diminishes free circulating free BPA.

20 After dermal exposure, the absorption fraction can be considered approximately 25-30% of
21 the applied dose as a worst case assumption, which is directly systemically bioavailable.

22 For all the parenteral routes of exposure (including i.v., i.p., or subcutaneous) the
23 chemical is 100% systemically bioavailable: however, the clearance of free BPA from the
24 circulation appeared to be quite fast, as indicated by controlled studies in non human
25 primates showing a half-life in blood of 0.66 h with >50% of circulating BPA already
26 conjugated 5 min after i.v. injection.

27 The available modeled data, obtained after oral exposure, also point out that newborns
28 and babies up to 6 months constitute a potentially susceptible subpopulation due to
29 immature BPA metabolism but that the default factor which is used to account for the
30 toxicokinetic variability in the general population seems to be large enough to cover the
31 variability in the newborn population exposed via the oral route. Analogously, inter-
32 individual differences in the expression of the isoenzyme mainly responsible for BPA
33 glucuronidation are within a factor of 4, again covered by the usual the default factor, at
34 the estimated dietary exposures.

35

36 **Pharmacokinetics in animals**

37 There are major differences in BPA metabolism and disposition between rodents
38 (enterohepatic recirculation and extensive fecal excretion of unconjugated BPA) and
39 primates (extensive urinary excretion of conjugated BPA), that directly affects BPA half-
40 life. Indeed, rodents (mice and rats) show a prolonged clearance of BPA due to the
41 existence of the so-called entero-hepatic recirculation. After uptake from the GI-tract in
42 rats there is a high degree of conjugation of BPA in the liver. However, BPA is excreted
43 from the liver via bile into the GI-tract where it can be cleaved again resulting in free BPA
44 that can be recirculated or excreted via the feces. So, there may be a higher exposure to
45 free BPA especially in neonatal mice and rats after a specific oral dose when compared to
46 humans. In addition, there is another major interspecies difference related to neonatal
47 development in the Phase II metabolism of BPA, which is strongly age-dependent in
48 rodents. Thus, there may be a higher exposure to free BPA especially in neonatal mice
49 and rats after a specific oral dose when compared to humans. Indeed in primates the
50 degree of conjugation was not affected by developmental age, and consequently there
51 was no significant age-related change in internal exposure metrics for free BPA in
52 primates. It may be considered that for neonatal effects, studies in mice and rats may
53 over-predict adverse outcomes in humans (Shelnutt *et al.*, 2013).

1

2 **Toxicity of BPA**

3 Several repeated dose toxicity studies have been performed in mainly rodents. BPA was
4 found to be of low acute toxicity, and the lowest NOAEL for subchronic oral exposure
5 currently available is approximately 5 mg/kg b.w./day, based on effects on the liver as
6 target organ, as identified in several studies. The next lowest NOAEL for oral exposure is
7 50 mg/kg b.w./day, based on effects on the kidney.

8 Using the same studies from which the NOAEL of 5 µg/kg b.w./day was derived recently
9 with the bench mark dose (BMD) approach a BMDL₁₀ of 3.76 mg/kg b.w./day was
10 calculated (EFSA 2014). The BMDL₁₀ represents the lower level of the confidence interval
11 of the effect resulting in a 10% deviation from vehicle treated control animals. The
12 critical endpoint for this BMDL₁₀ was alteration in kidney weight. The two Points of
13 Departure (PoD), i.e. dose for liver toxicity and dose for kidney toxicity, are
14 quantitatively very similar, although conceptually different from a toxicokinetic point of
15 view. Indeed, the internal exposure of the organs is different: the hepatic exposure is
16 presystemic, whereas the renal exposure is systemic. The doses at the site of action (i.e.
17 liver and kidney) differ after the oral route of exposure because of the biotransformation
18 occurring in the liver resulting in a lower dose of free BPA for kidney exposure. The
19 SCHENIR supports the use of the newly developed t-TDI for the risk assessment of
20 medical devices.

21 BPA is not a mutagen in *in vitro* test systems, nor does it induce cell transformation. BPA
22 was shown to affect chromosomal structure in dividing cells in *in vitro* studies, but
23 evidence for this effect in *in vivo* studies is inconsistent and inconclusive. In addition, BPA
24 was found to be genotoxic in *in vitro* micronucleus assay. These findings were not
25 confirmed by *in vivo* studies. Therefore, BPA is not likely to pose a genotoxic hazard to
26 humans.

27 In standard carcinogenic testing protocols according to OECD BPA has no carcinogenic
28 activity. In addition, in multigeneration studies no indication of increased cancerogenicity
29 was observed. Studies using subcutaneous administration of BPA indicated that BPA may
30 have the ability to increase the effects of well-known carcinogens even at very low BPA
31 levels. The studies had limitations which render them unsuitable to assess whether BPA
32 itself has a carcinogenic potential by prenatal or peri-natal exposure.

33 Prenatal exposure to BPA by subcutaneous injection and oral administration at doses
34 between 2.5-1000 µg/kg b.w. induced mammary gland alterations including cell
35 proliferation, some described as pre-neoplastic and neoplastic lesions, in the offspring.
36 Results observed in rhesus monkey also indicated alterations of glandular tissue in the
37 mammary gland. However, the variability in mammary gland development in this species
38 makes it difficult to draw clear conclusions for the risk assessment. In contrast, similar
39 alterations were not observed in the pups of the mouse multigeneration studies with
40 continuous oral BPA exposure.

41 In summary, at present there are no indications for carcinogenic effects of BPA in OECD
42 guideline studies, but some effects in the mammary gland have been reported. The
43 observed effects on mammary gland development do need further investigation as the
44 biological significance of such alterations as well as the relevance for humans are at the
45 moment not known.

46 Studies on anxiety (rodent and non-human primate) have a behavioural endpoint which
47 is highly depending on study design, including testing apparatus, inclusion of only one
48 sex, age at examination. There is uncertainty with regard to the interpretation of the
49 data. Recent data confirm previous data on the sex-dimorphic effects of BPA on social
50 behaviour. However, it is uncertain whether elimination of sexual dimorphism could be
51 considered adverse for humans. Other effects described in the recent studies may
52 indicate that the effects observed with BPA on hypothalamic organization involves

1 mechanisms different from its estrogenic action because they are very different from
2 those of oestradiol which was used as positive control.

3 BPA is able to elicit skin sensitization in humans, because it is a weak sensitiser. Studies on
4 a possible relationship between prenatal and/or postnatal BPA exposure and allergic
5 responses are not consistent. Although effects on the immune system are suggested the
6 data are insufficient to draw final conclusions on the immunotoxicity of BPA. In view of
7 these suggested effects of BPA on the immune system further investigation to determine
8 potential immunotoxicity of BPA is warranted.

9 The toxicological data do not indicate a clear effect of BPA on cardiovascular function.

10 Several published studies in laboratory animals have directly addressed the issue of whether
11 developmental exposure to BPA can affect adiposity, glucose or insulin regulation, lipid
12 profiles or other endpoints related to diabetes or metabolic syndrome. Animal studies,
13 however, have shown contrasting results (e.g. increase, decrease and no effect on body
14 weight). The discrepancy among the various animal studies may arise from variation in
15 experimental conditions, such as dosing regimen, animal species and strains, and timing
16 of evaluation of effects. A number of studies in prenatally- and postnatally exposed rats
17 and mice suggest that BPA exposure has an effect on metabolic function. In some of the
18 studies, the findings have been claimed as evidence of a non-monotonic dose-response as
19 effects were seen at a lower dose which was not observed in higher doses. However,
20 effects were only seen at one dose level. There are no studies which demonstrate effects
21 of different effect size at two dose levels and no or a reduced effect at a higher dose thus
22 corroborating the existence of non-monotonicity. There is, however, no convincing
23 evidence that BPA is obesogenic later in life after intrauterine exposure or in longer-term
24 studies. Therefore, regarding a metabolic effect of BPA. No clear conclusions can be
25 drawn at the moment due to a lack of consistent evidence. Inconsistent results were also
26 obtained in epidemiological studies. Therefore, this issue still warrants further
27 investigation.

28 A large number of studies is available on the effects of BPA on reproduction and prenatal
29 development some of which performed according to internationally agreed guidelines and
30 in compliance with GLP principles. A wealth of *in vitro* results and studies on non-intact
31 animals (such as ovariectomized rodents) is available, but their value for risk assessment
32 is questionable. There are also uncertainties as to reproducibility of several individual
33 studies. These studies were conducted in rats and mice. Overall, female reproductive
34 toxicity after oral exposure occurred with an overall NOAEL of 50 mg/kg b.w./day and a
35 LOAEL of 500 mg/kg b.w./day, derived from the Tyl *et al.* (2002) multigeneration study.
36 However, at the LOAEL for female reproductive effects, significant body weight reduction
37 and hepatic toxicity occurred. As to developmental toxicity, Bisphenol A does not cause
38 malformations or birth defects in rats or mice at levels up to the highest doses
39 evaluated: 640 mg/kg b.w./day (rats) and 1250 mg/kg b.w./day (mice). BPA does not
40 alter male or female fertility after gestational exposure up to doses of 500 mg/kg
41 b.w./day in the rat (Tyl *et al.*, 2002) and 600 mg/kg b.w./day in the mouse (Tyl *et al.*,
42 2008, highest dose levels evaluated). BPA does not permanently affect prostate weight at
43 doses up to 475 mg/kg b.w./day in adult rats or 600 mg/kg b.w./day in mice. BPA does
44 change the age of puberty in male or female rats at high doses (ca. 500 mg/kg
45 b.w./day). Neurodevelopmental toxicity was not observed at the highest dose tested
46 (164/410 mg/kg b.w./day, Stump *et al.*, 2010).

47 On the basis of the above studies, it can be concluded that BPA is not a specific
48 reproductive or developmental toxicant. General toxicity effects such as body and organ
49 weights and liver histopathology and nephropathy often occur simultaneously with
50 reproductive or developmental effects, which are only observed at high dosages.

51 A number of studies in prenatally- and postnatally exposed rats and mice indicate that
52 BPA exposure has an effect on metabolic function as evidenced by effects on glucose or
53 insulin in regulation or lipogenesis, and may affect bodyweight gain at least in short-term
54 studies. There is, however, no convincing evidence that BPA is obesogenic later in life

1 after intrauterine exposure or in longer-term studies. In some of the studies the findings
2 have been considered as evidencing a non-monotonic dose-response as effects were
3 seen at a lower dose which was not observed in higher doses. However, again effects
4 were seen only at one dose level. There are no studies which demonstrate effects of
5 different effect size at two dose levels and no or a reduced effect at a higher dose thus
6 corroborating the existence of non-monotonicity. Additionally, epidemiological studies do
7 not show unequivocal convincing evidence for metabolic effects of BPA.

8 A limited, but increasing number of epidemiological studies investigated an association
9 between BPA exposure and health outcomes, including altered behavior after dental BPA
10 exposure. Most of them use cross-sectional designs not suitable for identifying a cause-
11 effect relationship, limiting their interpretability, especially for outcomes that have long
12 latency periods (e.g. cardiovascular disease, diabetes). In addition, many of these cross-
13 sectional analyses have several important weaknesses that limit their interpretation. The
14 major limitation is the use of a single spot urine sample that reflects recent BPA exposure
15 only (past several hours) and may not adequately measure BPA exposure during the
16 relevant etiological window for cardiovascular disease and diabetes, which might be years
17 or decades earlier. Conclusions based on cross-sectional analyses are not possible.

18 For further clarification and interpretation of the relationship between BPA exposure and
19 adverse health effect additional studies are needed. These should include prospective
20 studies with serial exposures to BPA assessed during etiologically relevant windows,
21 years before development of disease, and thus prolonged follow up periods. Specific
22 recommendations for use of existing data include i) the development of conversion
23 models for the different media used for measurement, ii) inter-laboratory comparisons
24 and calibrations. Recommendations for further data collection on BPA include: i) a better
25 evaluation of exposure especially in children; ii) repeated measurements over time; iii)
26 validation and harmonization of questionnaires; and iv) adequate detection methods. It
27 has been suggested (Casas *et al.*, 2013) that although there is little published data in
28 mother-child cohorts, many measurements are ongoing which should start working
29 towards combined and comparison studies

30 **Conclusions**

31 There are several indications that BPA does have biological effects below the current
32 NOAEL of 5 mg/kg b.w./day and the recently calculated BMDL₁₀ of 3.76 mg/kg b.w./day
33 both derived from multigeneration reproductive toxicity studies after oral exposure.
34 However, the evidence has been mainly obtained from dedicated studies focussing on
35 specific outcome parameters like adiposity and hormone levels, and not from general
36 toxicity studies. Some of those parameters resulted in contradicting results in various
37 studies and dose-response relationships could not be established. Regarding possible low
38 dose effects, the studies raise some concern for prenatal BPA exposure and an effect on
39 mammary gland development and effects on altered behaviour/anxiety, although the
40 studies are not sufficiently robust to be used in risk assessment. In addition, the possible
41 effects on metabolism and adiposity need further investigations in large scale studies
42 with a wide dose range of BPA. In addition, results of BPA effects on anxiety need further
43 investigations. So far, epidemiological studies performed do not provide consistent
44 outcomes to conclude on possible human health effects. The currently performed study
45 by the FDA's National Center for Toxicological Research (NCTR) in the USA with animals
46 under a strict exposure regimen and the research to be conducted on these animals by
47 various research groups may clarify some of the controversial issues.

48 For medical devices several exposure scenarios were evaluated such as external short-
49 term contact with a medical device, short and long-term contact with dental materials,
50 medium- and long-term contact with an implanted medical device, long-term contact via
51 hemodialyzers and medium-term contact in intensive care units with various medical
52 devices.

53 The highest exposures estimated occurred during prolonged medical procedures in
54 infants (685 ng/kg b.w./day), and during treatment of prematurely born infants in NICU

1 (3000 ng/kg b.w./day). The use of medical devices consisting of BPA containing PVC
2 during treatment of of adults (1000 ng/kg b.w./day) and prematurely born infants (7000
3 ng/kg b.w./day, 7 µg/kg b.w./day) as single use or after short-term exposure (adults up
4 to 5000 ng/kg b.w./day, infants up to 12000 ng/kg b.w./day) might even be higher.
5 However, a serious limitation of these data is that the levels of exposure due to BPA
6 containing PVC use was estimated by extrapolating the migration properties of DHEP, as
7 no data on BPA leakage itself were available.

8 Contact with dental materials gave an estimated short- term (<24 hours) oral exposure
9 of 140 to 200 ng/kg body weight per day for children and adults, respectively, whereas long
10 -term exposure ranges from 2 to 12 ng/kg b.w./day. Some of the estimated BPA
11 exposures due to medical devices are in the same range as exposure to BPA via food
12 (EFSA 2013). Depending on the type of medical device, when the exposure route is
13 parenteral, BPA may be 100% systemically bioavailable, while the bioavailability of free
14 BPA after oral exposure is considered 1% of the ingested dose as the worst case. With
15 the exception of haemodialysis practice, exposure due to medical devices generally
16 occurs for a limited period of time.

17 It can be concluded that the oral long-term exposure via dental material is far below the
18 current oral t-TDI of 5 µg/kg b.w./day derived from animal studies and pose no risk for
19 human health. The same applies to the short-term (relatively high) exposure to BPA
20 released from dental materials that is still below the recently established t-TDI, also
21 considering that the peak of release is limited to few hours after application.

22 For the risk assessment for medical device giving rise to parenteral exposure, the
23 exposure data of prematurely born infants in a NICU are used (3000 ng/kg b.w./day).
24 The worst case scenario for exposure to BPA via use of medical devices consisting of BPA
25 containing PVC has been estimated to result in a potential higher exposure (up to 7000
26 ng/kg b.w./day) for these prematurely born infants. However, it is worth noting that
27 exposure to BPA via BPA-containing PVC has been estimated based on extrapolation from
28 data on phthalate leakage from PVC and are, therefore, affected by a high degree of
29 uncertainties. In addition, European PVC manufacturers do not use BPA in their PVC
30 production. Hence, it is unlikely that such a high exposure will be reached due to the use
31 of medical devices consisting of PVC.

32 Considering possible internal doses and bioavailability of free BPA for the maximum
33 estimated exposure to medical devices (3 µg/kg b.w./day with 100% systemic
34 bioavailability), the systemic exposure is about 60-fold higher when compared to the
35 internal exposure of free BPA using the oral t-TDI (being 0.05 µg/kg b.w./day based on a
36 TDI of 5 µg/kg b.w./day with 1% systemic bioavailability). When this systemic exposure
37 due to medical devices is compared against the internal exposure at the BMDL₁₀ in rats
38 and mice (3.76 mg/kg b.w./day), assuming 1% systemic bioavailability, the factor
39 between the internal exposure via medical devices (3 µg/kg b.w./day) and the internal
40 exposure at the BMDL₁₀ (37.6 µg/kg b.w./day) is about 12. The factor of 12 is lower than
41 the usual safety factor of 100 for assessing a margin of safety (MOS) when extrapolating
42 non toxic exposure doses for humans from results obtained in animal studies. For
43 prolonged medical procedures in infants with an estimated exposure of 685 ng/kg
44 b.w./day, the margin of safety is 55, while for the other exposure scenarios estimated
45 the MOS is well above 100.

46 Based on these data it is concluded that there may be some risk for adverse effects of
47 BPA when the BPA is directly available for systemic exposure after non-oral exposure
48 routes, especially in neonates. It should be considered that with the exception of dialysis
49 patients, the exposure is generally of limited duration. However, better data on exposure
50 would be beneficial for the refinement of this risk assessment. In addition, in view of the
51 controversial issues regarding possible low dose effects and their relevance for human
52 health, especially after prenatal and/or perinatal exposure, raising some concern for
53 exposure to BPA via medical devices in prematurely born infants. Further research under

1 well controlled exposure conditions, is warranted to confirm or negate these possible low
2 dose effects and their relevance for human health.

3 It should be realised that the benefit of using these medical devices should also be
4 considered: the survival of specifically these prematurely born infants often depends on
5 the availability of the same medical devices which result in a relative high BPA exposure
6 due to treatment. The possibility to replace BPA in these products should be considered
7 against their efficiency in the treatment, as well as the toxicological profile of the
8 alternative materials.

9

10 **Specific answers to the Terms of Reference**

11

12 The SCENIHR was requested to assess the following:

13 *1. To determine whether levels of exposure to BPA from the use of the various medical*
14 *devices containing BPA could give reasons for concern from the health point of view and,*
15 *if possible, to provide indications on limit values for BPA release from medical devices.*

16 It can be concluded that most of the exposure scenarios via medical devices results in an
17 exposure that is below the recently derived t-TDI of 5 µg/kg body weight per day
18 established by EFSA based on kidney toxicity as critical endpoint with a BMDL₁₀ of 3.76
19 mg/kg b.w./day. However, the internal systemic exposure due to certain medical
20 treatments may be higher than the internal exposure resulting from the oral t-TDI as
21 established for life long oral exposure. This maximal internal exposure due to medical
22 devices is about 12-fold below the internal exposure based on the BMDL₁₀ observed in an
23 oral toxicity study in rats and mice. This is lower than the usual factor (100x) used for
24 assessing a margin of safety (MOS) when extrapolating low to no risk exposure doses for
25 humans from results obtained in animal studies. For prolonged medical procedures in
26 infants with an estimated exposure of 685 ng/kg b.w./day, the margin of safety is 55,
27 while for the other exposure scenarios estimated the MOS is well above 100. Based on
28 these data there may be some risk for adverse effects of BPA, when the BPA is directly
29 available for systemic exposure after non-oral exposure routes.

30 *2. To identify whether any particular medical devices containing BPA could result in*
31 *human exposures which will give reasons for concern under their normal use patterns or*
32 *other foreseeable circumstances (e.g. high release of BPA due to the nature of the*
33 *material of the medical device or to particular contact conditions).*

34 The identification of exposure from medical devices is the weakest part of the evaluation.
35 More appropriate data on the content and release of BPA from medical devices in the
36 actual conditions of use would be beneficial for answering the question in a more
37 quantitative way. However, based on the available information, the highest exposure is
38 estimated to occur in NICU via a multitude of medical devices used, especially in
39 prematurely born infants. There is some reason for concern also in view of the
40 controversial issues on possible low dose effects in prematurely born infants in NICU.

41 *3. To identify, any patient group e.g. infants, pregnant and breastfeeding women who*
42 *would be particularly at risk in light of the answer to the above questions.*

43 Although not yet unequivocally demonstrated the possible metabolic effects, effects on
44 mammary gland development and neurodevelopmental toxicity should be considered and
45 raise some concern. These effects are observed in animals after prenatal exposure and
46 exposure early in life. Although differences in kinetics between rodents and primates
47 have been demonstrated, indicating a higher internal exposure in newborn rodents, at
48 the same level of external exposure, it can be assumed that the unborn child and the
49 newborn might be a population specifically at risk. However, it should be realised that the
50 benefit of medical devices should also be considered: the survival of these premature
51 infants often depends on the availability of the same medical devices which result in a
52 relatively high BPA exposure due to treatment.

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4. In case reasons for concern related to BPA are identified, to propose possible alternative approaches that could reduce potential risks either by identifying alternative practices or by identifying alternatives to the use of BPA in medical devices. If no clear answer can be provided on this point, the SCENIHR is asked to formulate recommendations for research that could help provide scientific evidence to that end.

Several alternatives for BPA exist and are increasingly used, notably Bisphenol S and Bisphenol F and some halogenated bisphenol A derivatives (e.g. tetrachlorobisphenol A and tetrabromobisphenol A). For some of the alternatives similar effects as for BPA were reported regarding endocrine activity in *in vitro* assays, although in general the alternatives had reduced activity/potency when compared to BPA. The toxicological profile of the alternatives to BPA is much less known, and at present it is not possible to compare the potential risk associated with alternatives to the risk due to BPA exposure.

Although internal BPA exposure via medical devices is generally below the internal exposure due to the recently derived oral t-TDI of 5 µg/kg body weight per day, for the worst case scenario an internal exposure above the internal dose of the oral t-TDI was noted. This internal exposure was below the internal dose of the oral BMDL₁₀ obtained in animal studies resulting in a margin of safety of 12. For prolonged medical procedures in infants the margin of safety is 55, while for the other exposure scenarios estimated the MOS is well above 100. Some concerns exist regarding controversial issues like possible low dose effects of BPA and their relevance for human health. Studies are currently being conducted in the USA to account for these uncertainties. Once new unequivocal and reproducible evidence for adverse effects at lower exposures becomes available, the risk of BPA via medical devices needs to be reconsidered in relation to the estimated exposure scenarios used in this Opinion. Recommendations for further research especially in the area of exposure through medical devices are presented in section 3.13.

The possibility to replace BPA in medical devices should be considered against their efficiency in the treatment, as well as the toxicological profile of the alternative materials.

5. MINORITY OPINION

None

6. LIST OF ABBREVIATIONS

AGD	Anogenital distance
AMPA	α-amino-3-hydroxy-5-methyl-4-isoxazolepropionic acid (receptor)
ANSES	Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (Agency for Food, Environment and Occupational Health and Safety, Paris, France)
AUC	Area Under the Curve
BADGE	Bisphenol A diglycidyl ether
BASC-SR	Behavior Assessment System for Children – Self Reported
BFDGE	Bisphenol F diglycidyl ether
BHP	N-nitrosobis-(2-hydroxypropyl)-amine
Bis-DMA	Bisphenol A dimethacrylate (2,2-di(4-Methacryloxyphenyl)propane)
Bis-EMA	Ethoxylated bisphenol A dimethacrylate (2,2-bis(4-(2-Methacryloxyethoxy)-phenyl)propane)

1	Bis-GMA	Bisphenol A glycidyl methacrylate
2	BMD	Bench Mark Dose
3	BMDL	Bench Mark Dose Low (lower value of 90% confidence interval of
4		BMD)
5	BMDU	Bench Mark Dose Upper (upper value of 90% confidence interval of
6		BMD)
7	BPA	Bisphenol A, Bis(4-hydroxyphenyl)propane
8	BPAQ	BPA-3,4-quinone
9	BPB	Bisphenol B, 2,2-Bis(4-hydroxyphenyl)butane
10	BPF	Bisphenol F, Bis(4-hydroxydiphenyl)methane
11	BPS(U)	Bis(4-hydroxyphenyl)sulfone
12	BRCA1	Breast Cancer 1 (gene)
13	b.w.	body weight
14	CEF	Panel on Food Contact Materials, Enzymes, Flavourings and
15		Processing Aids (EFSA panel)
16	CERHR	Center for the Evaluation of Risks to Human Reproduction (USA)
17	Cmax	Maximum concentration
18	CMV	Cytomegalovirus
19	CPB	Cardiopulmonary bypass
20	CYP	Cytochrome P450
21	dBPA	deuterated BPA
22	DEHP	Di(2-ethylhexyl) phthalate
23	DES	Di-ethylstilbestrol
24	DMAB	3,2-dimethyl-4-aminobiphenyl
25	DMBA	7,12-Dimethylbenz(a)anthracene
26	DMSO	Dimethyl Sulfoxide
27	DNA	Deoxyribonucleic acid
28	DNMT	DNA methyltransferase
29	DSP	Daily sperm production
30	EB	17 β -estradiol-3-benzoate
31	ECB	European Chemicals Bureau
32	ECDC	European Centre for Disease prevention and Control
33	ECHA	European Chemicals Agency
34	ECMO	Extracorporeal membrane oxygenation
35	EE	Ethinyl Estradiol
36	EFSA	European Food Safety Authority
37	ELISA	Enzyme-Linked Immuno Sorbent Assay
38	EMA	European Medicines Agency
39	ENNG	N-ethyl-N'-nitro-nitrosoguanidine

1	EPM	Elevated Plus Maze
2	ER	Estrogen Receptor
3	EtO	Ethylene oxide
4	EU-RAR	EU Risk Assessment Report
5	FAO	Food and Agriculture Organization
6	FDA	Food and Drug Administration (USA)
7	FST	Forced Swimming Test
8	GC	Gas Chromatography
9	GC-MS	Gas Chromatography-Mass Spectrometry
10	GD	Gestational Day
11	GI	Gastro-intestinal
12	GLP	Good Laboratory Practices
13	HCA	Hydroxycumyl alcohol
14	HDL	High-density lipoprotein
15	HED	Human Equivalent Dose
16	HPG	hypothalamic-pituitary-gonadal (axis)
17	HPLC-MS	High Pressure Liquid Chromatography-Mass Spectrometry
18	HPLC/UV-DAD	High Pressure Liquid Chromatography/Ultraviolet-Diode Array
19		Detector
20	ICU	Intensive Care Unit
21	IPCS	International Programme on Chemical Safety
22	ISO	International Organization for Standardization
23	i.v. (IV)	intravenously
24	LC	Liquid Chromatography
25	LC-ECD	Liquid Chromatography-ElectroChemical Detector
26	LC-MS	Liquid Chromatography-Mass Spectrometry
27	LD50	Lethal Dose at which 50% of the animals die
28	LDL	Low density lipoprotein
29	LOAEL	Lowest Observed Adverse Effect Level
30	LOD	Limit of Detection
31	LOQ	Limit of Quantification
32	MBP	4-methyl-2,4-bis(4-hydroxyl-phenyl) pent-1-ene
33	MOS	Margin of Safety
34	MRI	Magnetic Resonance Imaging
35	mRNA	Messenger Ribonucleic Acid
36	MS	Mass Spectrometry
37	MTD	Maximum Tolerated Dose
38	MWM	Morris Water Maze
39	NHANES	National Health and Nutrition Examination Survey (USA)

1	NICU	Neonatal Intensive Care Unit
2	NIEHS	National Institute of Environmental Health Sciences (USA)
3	NOAEL	No Observed Adverse Effect Level
4	NCTR	National Center for Toxicological Research (USA)
5	NHP	Non Human Primates
6	NMDA	N-Methyl-d-Aspartate (receptor)
7	NMU	N-nitroso- N-methylurea
8	NTP	National Toxicology Program (USA)
9	NTP-CERHR	National Toxicology Program-Center for the Evaluation of Risks to
10		Human Reproduction (USA)
11	OECD	Organisation for Economic Co-operation and Development
12	8-OHdG	8-hydroxydeoxyguanosine
13	OP	Object Placement
14	OR	Object Recognition
15	OVX	Ovariectomised
16	PBPK	Physiologically Based Pharmacokinetic (modeling)
17	PC	Polycarbonate
18	PEPA	Polyester-polymeralloy
19	PIN	Prostatic intraepithelial neoplasia
20	PND	Post Natal Day
21	ppm	parts per million (translates into mg/L or ng/mg)
22	PPAR	Peroxisome proliferator-activated receptor
23	PSD	Postsynaptic density
24	PSU	Polysulfone
25	PVC	Polyvinyl chloride
26	pWAT	Perigonadic white adipose tissue
27	REACH	Registration, Evaluation, and Authorisation of Chemicals (EU
28		Regulation)
29	RIA	Radioimmunoassay
30	RNA	Ribonucleic Acid
31	s.c. (SC)	subcutaneous
32	SCCS	Scientific Committee on Consumer Safety
33	SCENIHR	Scientific Committee on Emerging and Newly Identified Health Risks
34	SCHER	Scientific Committee on Health and Environmental Risks
35	SE	Standard Error
36	SPE	Solid-phase extraction
37	SULT	Sulfotransferase
38	TBBPA	Tetrabromobisphenol-A [2,2-bis(4-hydroxy-3,5-
39		dibromophenyl)propane]

1	TCBPA	Tetrachlorobisphenol-A [2,2-bis(4-hydroxy-3,5-
2		dichlorophenyl)propane]
3	TDI	Tolerable Daily Intake
4	T1DM	Type 1 diabetes mellitus
5	TEGDMA	Triethylene glycol dimethacrylate
6	UDPGT	Uridinediphosphate- glucuronosyltransferase
7	UGT	UDP-glucuronyltransferase
8	UPLC	Ultra Performance Liquid Chromatography
9	WHO	World Health Organization
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11		

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8.ANNEXES

1 **Annex I**

2

3 Eucomed comments on the use of BPA in Medical Devices (2012) Response to the
4 SCENIHR call for information on BPA in medical devices

5 A brief survey of our members identified the following examples of device types with
6 materials derived from BPA:

7 - Catheters for minimally invasive surgery

8 - Catheters for cardiac ablation

9 - Trocars

10 - Surgical and cardiovascular instruments

11 - Surgical meshes

12 - Laparoscopic instruments

13 - Endoscopes

14 - Spine cement mixing/delivery systems

15 - Polycarbonate packaging for products that are steam sterilized

16 - Photopheresis devices for cancer treatment

17 - Pacemakers

18 - Pacemaker catheter systems/catheter delivery systems

19 - Stents

20 - Stent delivery systems

21 - Blood oxygenator and dialysis membrane housings

22 - Luer fittings

23 - Needle hub

24 - Insulin Pump Infusion Sets

25 - Neurostimulators (implantable)

26 - Drug pumps (implantable)

27 - Neuromodulation catheter system/catheter delivery systems

28 - Balloon Dilatation Catheters

29

30 **Polycarbonate medical devices reported in Beronius and Hanberg 2011** (Plastic
31 Europe 2007)

32

33 Blood oxygenators

34 Cardiotomy reservoirs

35 Dialysers

36 Respirators

37 Dentists' operating lamps

- 1 Safety valves for respirators
- 2 Breast pumPS
- 3 Inhaler housings
- 4 Prescription spectacles
- 5 i.v. connectors
- 6 Scalpel cases
- 7 Laparoscope handles
- 8 Contact lens holders
- 9 Syringe toPS
- 10 Medical packaging film
- 11 Ampoules
- 12 Three - way stop cocks and stop cocks Manifolds
- 13 Tweezers with integrated lighting
- 14 Single - use operating instruments
- 15 Polycarbonate medical devices include:
- 16 - Catheters for minimally invasive surgery
- 17 - Catheters for cardiac ablation
- 18 - Trocars
- 19 - Surgical and cardiovascular instruments
- 20 - Surgical meshes
- 21 - Laparoscopic instruments
- 22 - Endoscopes
- 23 - Spine cement mixing/delivery systems
- 24 - Polycarbonate packaging for products that are steam sterilized
- 25 - Photopheresis devices for cancer treatment
- 26 - Pacemakers
- 27 - Pacemaker catheter systems/catheter delivery systems
- 28 - Stents
- 29 - Stent delivery systems
- 30 - Blood oxygenator and dialysis membrane housings
- 31 - Luer fittings
- 32 - Needle hubs
- 33 - Neurostimulators (implantable)
- 34 - Drug pumPS (implantable)
- 35 - Neuromodulation catheter system/catheter delivery systems
- 36 - Balloon Dilatation Catheters
- 37 *(Information provided by Eucomed, 2012)*
- 38

1 **Annex II**

2 Summary of BPA concentrations in or released from medical devices /medical grade
3 materials.

4 Chromatographic methods are considered more suitable for BPA analysis in biological
5 samples than immunochemical methods. ELISA methods are less reliable due to possible
6 cross reactivity of BPA parent compound and the conjugated metabolites and other BPA
7 similar phenolic structures, what can lead to an overestimation of free BPA
8 concentrations; also their sensitivity is low and may be subjected to matrix effects
9 (especially in urine samples).

10 Methods based on mass spectrometry detection (MS) are the most reliable. MS-MS
11 detection provides high sensitivity and selectivity, allowing the confirmation of the
12 identity of BPA based on fragment formations.

13 A crucial issue in BPA analysis at low levels in human samples, and a potential source of
14 different results published in the literature, is the differentiation in the measurement of
15 free BPA and its metabolites. Additionally, the contamination with BPA from external
16 sources, during sample collection and processing in the laboratory has to be assessed
17 through the analysis of blank samples to guarantee the reliability of the results.
18 Moreover, the possible hydrolysis of the conjugated metabolites into BPA free form
19 during sample storage needs to be considered. In that sense, those methods using an
20 internal standard, typically a stable isotope labeled BPA with use of MS, are more reliable
21 since they provide a means to determine the effect of complex matrices of blood and
22 urine samples, and the stability of BPA in the biological samples during analysis.

23

Reference	Sample	Extraction method	Method of analysis	LOD	BPA concentration	Remarks	Reliability
Haishima <i>et al.</i> (2001)	PC pellets (2 types) PS pellets PC casings(2) (lacking hollow fibres)	Dissolution, THF Extraction (shaking, 16h, RT, 10 mL): water methanol	HPLC GC-MS LC-MS , and NMR spectros copy	0.65 ppb (HPLC) 0.16 ppb (GC-MS)	4.0 and 7.2 ug/g 34.5 ug/g 11.7 and 13.7 ng/casing 296 and 345 ng/casing	Total content in the material. Released amount from the material under the indicated conditions	+
data submitted in response to the Call for Information (2012)	PC pellets PC trocar tubing	Extraction, 37°C, 24h: IP Ethanol IP Ethanol 0.9 % sodium chloride, 37°C time point up to 168 h	HPLC		0.247 - < 0.52 ug/g < 0.5 ug/g 0.28 - < 0.50 ug/g < 0.5 ug/g < 2 ug/g	Total content extracted with IP according to the authors No detailed information on method performance to assess the reliability of the data	+
Haishima <i>et al.</i> (2001)	Hemodialyzers: PCcasing/ PS fiber (2) PCcasing/ cellulose acetate fiber (1) Polystyrenecasing/PS fiber (1)	Recirculation (250mL, 10 mL/min, 16 h, RT): Water Bovine serum	HPLC GC-MS LC-MS , and NMR spectros copy	0.65 ppb (HPLC) 0.16 ppb (GC-MS)	Water Bovine serum (ng/module) 31.0-141.8 1010-2090 34.1 196.1 3.78 140.7	Released amount from the material under the indicated conditions. Higher BPA released was found for all types in bovine serum compared with water	+

Shintani (2001)	<p>Hemodialyzers:</p> <p>PC casing/ PS fiber) autoclaving sterilization (2)</p> <p>PCcasing/ PS fiber - gamma-ray sterilization (1)</p> <p>Polystyrene-butadiene copolymer casing/PS fiber-gamma-ray sterilization(1)</p> <p>PCcasing/ PS fiber)- autoclaving sterilization (2)</p>	<p>Perfusion on patients, 4 h, 3 times a week, for 3 months consecutively</p> <p>Saline solution - 800 mL (according to ISO 10993-7)</p>	<p>HPLC-ECD</p> <p>HPLC-MS</p>	<p>0.02 ng/mL plasma</p>	<p>0.2 - 0.7 ng/mL (mean value, n=4)</p> <p>< LOD (mean value, n=4)</p> <p>< LOD (mean value, n=4)</p> <p>0.1 -0.2 ng/mL</p>	<p>Measured values in blood of uremia patients after dialysis.</p> <p>No BPA was detected in the the blood samples collected before dialysis</p>	<p>Not reliable as the sensitivity and specificity of the method is insufficient to detect and quantify the concentrations in serum of normal subjects.</p> <p>The value of 0.2-0.7 ng/ml is not reliable.</p>
Yamasaki <i>et al.</i> (2001)	<p>Hemodialyzers:</p> <p>Polystyrene casing/PS fiber (A,B)</p> <p>PCcasing/ PS fiber (C,D)</p> <p>PCcasing/ EVAL fiber (E)</p>	<p>Filled with reverse osmotic water.</p> <p>Recirculation of saline solution (200 mL), 200 mL/min, 4h</p> <p>Blood samples from hemodialyzed patients (dialysate flow rate 500 mL/min)</p>	<p>HPLC</p>	<p><i>Not given</i></p>	<p>ND (A, B)</p> <p>0.23 ppb (C), 1.14 ppb (D); 0.19 ppb (E)</p> <p>ND (A, B)</p> <p>0.16 ppb (C), 0.75 ppb (D); 0.20 ppb (E)</p> <p>ND (C) (n=3)</p> <p>0.49; 0.67; 1.15 ppb (D)</p>	<p>Lack of data on method performance.</p> <p>Released BPA amount from the material under the indicated conditions.</p> <p>Saline solution was recirculated after the removal of the osmotic water and washing with 800 mL of</p>	<p>not reliable</p>

						saline solution	
						Mean value 0.77 ppb in blood. Patients with almost no residual renal function	
Shintani <i>et al.</i> (2003)	Membranes, ozone gas sterilized: PS, 20 mg aprox. (3) PC, 7 mg aprox. (1) both types unsterilised and steam-sterilized (121°C, 15 min)	Extraction, ethanol	LC-UV-MS	0.02 ppb	43 – 207 mg/kg ozone gas sterilized: 119 ppm < LOD	Released amount from the material under the indicated conditions. BPS also detected in PS membranes (355; 63; 32 mg/kg)	reliable
Murakami <i>et al.</i> (2007)	Hollow fibres: PS PEPA (Polyester-polymeralloy) Hemodialyzers with PS membranes	Extraction (10 mg) with hexane. Redissolution of residue in dimethylsulfoxide. Perfusion on 15 patients, who previously underwent hemodialyses for at least three months with a PS dialyser	ELISA	0.3 ng/mL	83.3 ng/10 mg 122.5 ng/10 mg Mean increase, after 1 month session: from 4.83±1.94 to 6.62±3.09 ng/mL (1 st test) from 4.09±2.78 to 4.27±2.98 ng/mL (2 nd test)	Released amount from the material under the indicated conditions (mean values, n=6) The quoted differences are certainly not statistically significant. 56.6 % cross-reactivity with water-soluble	not reliable, because of cross-reactivity

						±0.1 ng/mL) compared to pre-dialysis values of patients (9.1 ± 4.5 – 12.0 ± 6.0 ng/mL). Lack of data on method performance.	
Cho <i>et al.</i> (2012)	Hemodialyzer/hemoco ncentrators with polysulfone membranes: 0.5 m ² (7.9 g) 0.4 m ² 0.7 m ²	Ten consecutive extractions (1 h each) with 1L of 17.2 % ethanol at 37°C, 200 mL/min. One single extraction, 6 h, with 1L of 17.2 % ethanol at 37°C, 200 mL/min.	LC/MS	0.02 ng/ml (LO Q)	19.7 ug ≈1.3-1.4 ng/ml ≈0.65-0.7 ng/ml	The released amount from the material corresponded to 95 % of the predicted amount using an elution profile equation . Aproximated values read from the published figure. Limited information on method performance.	reliable
data submitted in response to the Call for Information (2012)	Neonatal incubators	Analysis of gas in contact with the hoods	ISO 16000-6	50 ug/m ³	< LOD	Very limited information provided to assess the reliability of the	unknown

						data	
Sakurai H. (2002) only abstract in english	cardiopulmonary bypass circuits with PC parts (8)	Priming with a saline solution Blood samples taken from 6 patients once the CBP was initiated and at the termination	GC		0.9 ± 1.1 ug/l 0.3 ± 0.2 ug/l (after the commencement of CBP) 0.4 ± 0.3 ug/l (at the termination of CBP)	No BPA detected in 3 controls samples. Info in the abstract not enough for the evaluation of the data. The quoted differences are certainly not statistically significant. Info in the abstract not enough to assess the reliability of the data.	unknown
Lewis <i>et al.</i> (1999)	commercially available dental composites and sealants	Dissolution in acetonitrile (removal of fillers by centrifugation)	HPLC	No quant.		BPA not verified in any material. Bis-DMA verified in 3 products in the same product line	unknown
Manabe <i>et al.</i> (2000)	commercially available dental composites and sealants	Dissolution in methanol (removal of fillers by centrifugation)	Derivatization w TMS GC/MS	1 ng/mg	6.6/15.4/18.5/20.2 ng/mg material	In 4 materials (unpolymerized). Not detected in 2 mater.	reliable
Mazzauoi <i>et al.</i> (2002)	different dental materials	Extraction into water or water/ethan	HPLC/MS	-	0 from 3 materials, 13 ± 8 or 67	BPA extracted from 1 sealant	reliable

BPA in Medical Devices

		ol mix			± 4 mmol/m^2 (1d, water) or 122 ± 18 or 399 ± 61 mmol/m^2 (90d, 75% ethanol)	and 1 bonding material	
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