

Ban on bisphenol A (BPA) in food packaging

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EU prohibits use of bisphenol A (BPA) in packaging

Commission Regulation (EU) [2024/3190](#) of 19 December 2024 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213

Update

The EU has adopted stricter rules on the use of bisphenol A (BPA) and related chemicals in food contact materials. This is due to health concerns about the presence of BPA in food. This new Regulation bans the use of BPA in the manufacture of plastic food contact materials and other materials, including varnishes and coatings, printing inks, and adhesives. There are limited exceptions for the use of BPA in certain plastic film membranes and varnishes on large tanks and vessels used in food production. Where other uses are critical to the manufacture of food contact materials, authorisation may be requested.

The new rules apply from **July 2026**; or in the case of single use “food contact articles” intended to preserve fruit and vegetables and fishery products, from **January 2028**.

Impacted products

All food produced, packaged, or stored in materials that may contain BPA or other hazardous bisphenols or their derivatives (e.g. metal food packaging such as cans, tins, and jar lids; plastic packaging including polycarbonate and polysulfone)

What is changing?

Key points

Scope: The new Regulation (Art. 1) sets rules for the use of BPA and other hazardous bisphenol derivatives in the following categories of food contact materials:

- adhesives
- rubbers

- ion-exchange resins
- plastics
- printing inks
- silicones
- varnishes and coatings.

There are also rules on the content of BPA in food contact materials that have been manufactured using other bisphenols or their derivatives.

Prohibition of BPA: The use of BPA in the listed food contact material categories is prohibited (Art. 3), except for the specific applications listed in Table 1 below (Annex 2).

No BPA residues permitted: Food contact materials manufactured using other bisphenols or bisphenol derivatives must not contain any BPA residue (Art. 4).

Other hazardous bisphenols and derivatives: These must not be used in the manufacture of food contact materials (Art. 5) unless they have been authorised, or an application for authorisation of an existing use has been submitted and certain conditions are fulfilled (see below).

Authorisation for use of hazardous bisphenols other than BPA: An application for specific use of a hazardous bisphenol other than BPA can be submitted to EFSA (Arts. 6 and 7), in accordance with Regulation [1935/2004](#) (Art. 9). On the basis of EFSA's opinion, the European Commission can decide whether or not to authorise use of the hazardous bisphenol. EFSA will publish details on the information needed to support an application by early 2027.

Operators using BPA as in Table 1 below (and for subsequently authorised uses) must provide the Commission with information on the status of alternatives to the hazardous bisphenol 4 years after authorisation. Micro, small and medium-sized enterprises (see definition in [European Commission 2003](#)) do not have to report this information, but can do so on a voluntary basis.

Declaration of compliance: For foods in contact with relevant materials (plastics, varnishes/coatings, printing inks, adhesives, ion-exchange resins, rubbers), businesses at all stages in the supply chain must provide a written declaration that the materials they use are compliant (Art. 8, Annex III). This declaration of compliance should contain the:

- identity/address of the business operator issuing the declaration
- identity/address of the business operator manufacturing or importing the food contact material or article
- identity of the food contact material (including intermediate materials) and final food contact article (including packaged food)
- date of the declaration

- list of any BPA or bisphenol derivatives used in manufacturing the food contact material
- confirmation that the intermediate or final food contact material or article complies with Regulations 2024/3190 and 1935/2004 (Arts. 3, 15, 17).

Why?

Following a review, [EFSA \(2023\)](#) found that even minimal BPA migration into foodstuffs could exceed established tolerable daily intake (TDI) levels, with adverse effects on health, especially on the immune system.

The use of BPA in food contact materials must be minimised to protect consumers' health. Good manufacturing practices can reduce residues of BPA to negligible amounts. However, use of BPA is permitted in some cases due to the limited availability of alternatives that can provide the same strength and chemical stability. For example, BPA can still be used in plastic separation membranes (for example those used to produce dairy-based foods), and in large containers.

Timeline

By **20 July 2026**, packaged food placed on the EU market will have to comply with these new rules.

However, there is an exception for packaged fruit and vegetables and fishery products that comply with current rules, which can be placed on the EU market until **20 January 2028**. This exception for fruit and vegetables does not apply to fruit juices and nectars (defined in Regulation [2001/112/EC](#), Annex I).

There is also an exception for food in containers where a varnish or coating manufactured using BPA has been applied only to the *exterior* metal surface: these products can be placed on the EU market until **20 January 2028**.

What are the major implications for countries exporting to the EU?

Because BPA-based products are widely used, transitioning away from BPA will require careful planning to prevent supply chain disruptions. Many businesses have already started adapting to BPA-free manufacturing processes in response to demand. The transition periods included in this Regulation are intended to provide operators the time to develop alternative solutions.

The new rules will be a particular challenge for high-acidity foods such as tomatoes. Also sourcing sufficient quantities of compliant materials will be potentially difficult in the case of

seasonal foods, particularly fish products, where there is high demand for packaging in peak periods. Alternatives to BPA for varnishes and coatings used on external surfaces of metal packaging are under development.

Recommended Actions

All suppliers of packaged foods to the EU market (particularly of fruit, vegetable, and fish products) should alert their packaging suppliers to the new rules, and evaluate strategies to transition away from the use of BPA. From the relevant dates (see Timeline), a declaration of compliance will have to accompany food contact materials and articles at all stages of the supply chain.

Background

BPA is commonly used in varnishes/coatings applied to surfaces of food packaging, such as cans, tins, or jar lids. It can be also used in materials such as printing inks and adhesives. BPA can migrate from food packaging into food.

BPA can currently be used in the manufacture of plastic food contact materials, provided a specific migration limit of 0.05 mg/kg of food is respected. The use of BPA in drinking bottles for children was already prohibited by Regulation [2018/213](#), which this new Regulation replaces.

Regulation [10/2011](#) (which is amended by this new Regulation) is one of a series of Regulations relating to specific food contact materials. It reinforces Regulation [1935/2004](#), which sets out the EU's overall approach to food contact materials. For further information see [Food contact materials explained](#).

Regulation [2023/2006](#) sets out general rules on good manufacturing practice related to quality assurance systems, quality control systems, and documentation. It also sets out specific rules on printing inks and quality assurance systems for plastic recycling processes.

Resources

EFSA (2023) [Re-evaluation of the risks to public health related to the presence of bisphenol A \(BPA\) in foodstuffs](#). EFSA Journal, 21(4): 6857.

European Commission (2003) [Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises](#).

European Commission (2013) [Union Guidance on Regulation \(EU\) No 10/2011 on plastic materials and articles intended to come into contact with food as regards information in the supply chain](#). Updated 2016.

European Commission (2014) [Union Guidelines on Regulation \(EU\) No 10/2011 on plastic materials and articles intended to come into contact with food](#). Updated 2016.

European Commission (2015) [Food contact materials](#).

Regulation (EU) No [10/2011](#) on plastic materials and articles intended to come into contact with food


Regulation (EU) [2018/213](#) on the use of bisphenol A in varnishes and coatings intended to come into contact with food

Regulation EU No [321/2011](#) as regards the restriction of use of Bisphenol A in plastic infant feeding bottles

Sources

Commission Regulation (EU) [2024/3190](#) on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food

Table & Figures

Table 1 Permitted uses of bisphenol A (BPA)		
Material type	Specific application for use as a monomer or starting substance in the manufacture of:	Other restrictions
Varnishes and coatings	Liquid epoxy resins on self-supporting food contact materials or articles with capacity over 1,000 litres	Migration into food should not be detectable; final food contact articles should be cleaned and flushed before first contact with food
Plastics	Polysulphone filtration membrane assemblies	Migration into food should not be detectable; final food contact articles should be cleaned and flushed before first contact with food
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Source: Regulation [2024/3190](#), Annex II

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