



Gezondheidsraad
Health Council of the Netherlands

Response Health Council to comments draft report *Bisphenol A*

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1 Reactie op commentaar PlasticsEurope/ Respons to comments PlasticsEurope

Op 26 maart 2019 heeft de Gezondheidsraad per brief gereageerd op het gezamenlijke commentaar van VVVF, VLK, VvVH, NRK en PlasticsEurope Nederland op het concept van Bisfenol A. De reactie staat hieronder, in dezelfde taal als de originele reactie (Engels).

On March 26, 2019 the Health Council sent a letter to VVVF, VLK, VvVH, NRK and PlasticsEurope Nederland in response to the comments on the draft report on Bisphenol A. The response is cited below, in the same language as the original comments.

'In your commentary letter, objections were outlined on the methodology and data used for the recommendation. The main objection was that the Committee applied a non-health-based approach, and used literature with a low reliability to justify its recommendation. Also, in the joint commentary letter you objected against the recommended skin notation and suggested additional literature. Finally, you noted that the proposed advisory value raises significant concerns about the proportionality, feasibility, and broader socio-economic impacts.

The Committee has considered your comments and re-assessed its draft report and the available literature on bisphenol A. The Committee has decided to adapt the draft report and reconsidered its recommendations on an advisory value and skin notation. With respect to feasibility and socio-economic impact, it should be noted that it is not within the tasks of the Committee to take these issues into account. In October 2018, an additional consultation period was initiated for the updated version of the draft report, which did not result in any further comments.'

2 Reactie op commentaar de heer Hendrickx/ Respons to comments mr Hendrickx

Op 26 maart 2019 heeft de Gezondheidsraad per brief gereageerd op het commentaar van de heer Hendrickx op het concept van Bisfenol A. De reactie staat hieronder, in dezelfde taal als de originele reactie (Engels).

On March 26, 2019 the Health Council sent a letter to mr Hendrickx in response to his comments on the draft report on Bisphenol A. The response is cited below, in the same language as the original comments.

'In your commentary letter, you argued that the Committee did not apply a health-based approach, and did not support its recommendation with "representative and firm studies". Also, you noted that implementation of the proposed advisory value would result in "inappropriate, unwanted and disproportionate measures for employee occupational health surveillance".

The Committee has considered your comments and re-assessed its draft report and the available literature on bisphenol A. Consequently, the Committee has decided to adapt the draft report and reconsider its recommendations on an advisory value and skin notation. It should be noted that it is not within the tasks of the Committee to take into account issues regarding implementation. In October 2018 an additional consultation period was initiated for the updated version of the draft report, which did not result in any further comments.'

3 Reactie op commentaar NIOSH / Respons to comments NIOSH

Op 26 maart 2019 heeft de Gezondheidsraad per brief gereageerd op het commentaar van het National Institute for Occupational Safety and Health (NIOSH) op het concept van Bisfenol A. De reactie staat hieronder, in dezelfde taal als de originele reactie (Engels).

On March 26, 2019 the Health Council sent a letter to the National Institute for Occupational Safety and Health (NIOSH) in response to his comments on the draft report on Bisphenol A. The response is cited below, in the same language as the original comments.

'[...] the Dutch Expert Committee on Occupational Safety (DECOS) of the Health Council [...] appreciates the careful review of Mrs Hines, Mr Park, Mr Perumal Kuppusamy, and Mrs Alexander, and has taken their comments into consideration when finalising the report.

NIOSH had several main comments on the approach proposed by DECOS to derive an advisory value, and also other more minor comments. The Committee has considered these comments and re-assessed its draft report and the available literature on bisphenol A. The Committee has decided to adapt the draft report and reconsidered its recommendations on an advisory value and skin notation. In October 2018, an additional consultation period was initiated for the updated version of the draft report, which did not result in any further comments.'