

ETPA Statement on EU Regulation 2024/3190

Clarification on the Use of Bisphenol S (BPS) in Thermal Paper for Food Contact Applications

June 2026

The European Thermal Paper Association (ETPA) has become aware of concerns in the market that Bisphenol S (BPS) may no longer be used in thermal paper for food contact applications as of 20 July 2026. The ETPA wishes to address these concerns in the context of the applicable regulatory framework under Regulation (EU) 2024/3190¹.

Regulatory Background

Commission Regulation (EU) 2024/3190 entered into force on 20 January 2025, banning the use of Bisphenol A (BPA) and other hazardous bisphenols in the manufacture of various products intended to come into contact with food. The ban on BPA in certain food contact materials has no direct effect on thermal paper producers, due to the already existing restriction of BPA in thermal paper under REACH.

The Regulation does not ban the use of bisphenols other than BPA as of 20 July 2026. The 18-month transition period expiring on that date relates specifically to the placing on the market of single-use food contact materials containing BPA. It does not impose a prohibition on the use of BPS in food contact materials on that date.

For bisphenols other than BPA, such as BPS, the Regulation tasks the European Food Safety Authority (EFSA), in collaboration with the European Chemicals Agency (ECHA), with the drafting of guidelines relating to the authorisation of those substances in food contact materials. Such applications can only be filed once EFSA has published these guidelines, which is expected by January 2027². As of the date of this statement, EFSA has not yet published its final guidance; only a draft is available³.

Until the publication of the guidelines, there is no possibility to apply for an authorisation, and BPS can continue to be used in food contact materials. The European Commission will then decide upon any such applications by the end of 2027 at the earliest, more likely in 2028. Until such time, BPS can still be used in food contact materials.

Position of the ETPA

The ETPA confirms that:

- BPS can continue to be lawfully used in thermal paper coatings for food contact applications. The authorisation process under Regulation (EU) 2024/3190 is not expected to conclude before the end of 2027 at the earliest.
- Under REACH, there is currently no restriction on the use of BPS in thermal paper, provided the applicable information and notification requirements are complied with.

¹ 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.

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

³ <https://connect.efsa.europa.eu/RM/s/consultations/publicconsultation2/a0ITk000007q5h7/pc1873>.

- The estimated regulatory timeline set out in this statement is consistent with the position previously communicated by the ETPA in June 2025 and remains valid as at the date of this publication.

Next Steps

The ETPA is closely monitoring any regulatory changes impacting the thermal paper sector and is committed to communicating transparently with its customers about new developments. ETPA members will continue to take the necessary steps to comply with their obligations and to ensure the highest level of safety in the manufacturing processes of thermal paper.

For more information about ETPA please visit our website: <https://etpassociation.org>

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