

CAOBISCO Request to the European Commission on BPA Transition Period for Industrial Chocolate Moulds

SCOPE OF THE REQUEST

CAOBISCO requests a minimum **5-year prolongation of the transition period** for phasing out BPA in moulds used for advanced industrial scale chocolate production¹ extending the deadline to 20 January 2033. This additional time will allow industry to complete final material selection, testing and validation (up to 2 years), followed by further 3 years for industrial scale testing, adaptation and full implementation. In the interim, CAOBIISCO proposes a stocktaking meeting with the Commission in 2028 to review progress and maintain transparent dialogue.

To support the request, in the last two years, chocolate industries have conducted 3 projects to find and validate alternative materials:

Project 1: 40 test set-ups across 10 companies and 28 production lines, 5 alternative materials, of which 97% not viable for full commercial production, only one candidate identified and not yet validated at industrial scale;

Project 2: 10 alternative materials tested in 2 plants, 7 lines, 29 trials. Resulting in 26 negative, only 3 partially successful;

Project 3: Identification of alternative material, then tested through a validation program and test rig. Successively, 86 BPA free moulds run in mixed trial alongside traditional moulds across three active factory-line combinations.

ARGUMENTS SUPPORTING LONGER TRANSITION PERIOD

Argument	Why it supports the requested timeline
Food safety	Alternative materials present a higher risk of breakage, deformation, abrasion and degradation, leading to risk of foreign bodies in the finished products. Replacing a negligible, well-controlled BPA-migration risk (<1 µg/kg) with an undetectable foreign-body risk from unvalidated polymers is disproportionate. Sufficient time to identify a safe alternative polymer must be a priority before introducing an unsafe alternative.
Validation time	Laboratory and pilot testing cannot reflect industrial complexity. Multi-year, large-scale validation across formats, lines and washing processes is required, including interaction with downstream operations and durability tests.
Security of supply	There are currently 4 standard mould material (with BPA) suppliers, but only 1 alternative material supplier. A single non-EU BPA-free material supplier creates a near-monopoly and consistent supply risk without more time to diversify.
Industrial transformation	Changes to moulds, production processes and cleaning procedures affect multiple stages of manufacturing and can only be implemented progressively. Replacing BPA-containing materials is not a simple one-for-one substitution, but a complex transformation requiring extensive adaptation and revalidation across production facilities.
Mould production capacity	Manufacturing capacity should also be considered. Even once an alternative material has been validated, specialist mould manufacturers require significant time to design, produce, and qualify new moulds. If all manufacturers were required to transition simultaneously, industry-wide demand would exceed available manufacturing capacity. Tooling lead times therefore represent a critical constraint alongside material validation.

RISKS IF TIMELINE NOT EXTENDED

Consumer safety: trials show current alternatives increase the risk of mould degradation, abrasion and micro-fragment release, undetectable by current QC systems. Consumer safety at risk/ not guaranteed with current alternatives.

Supply disruption: monopoly, non-EU sourcing of the alternative polymer, amplified by geopolitical and petrochemical market instability.

Competitive distortion: EU producers would be disadvantaged versus non-EU chocolate producers not subject to the same material constraints.

Operational disruption: Forcing conversion before moulds, processes and cleaning systems are validated risks interrupting production and consumer supply.

Loss of value creation in EU: A requirement to switch prematurely to not fully proven alternative materials is unfeasible and drives production to countries outside the EU.

A 5-year, evidence-based extension is a proportionate, risk-based approach that maintains consumer safety, supply security and EU industry competitiveness.

¹ Industrial chocolate moulds are moulds that are used in manufacturing processes that are in their vast majority mechanized and automated, including thermo pressed moulds used for professional chocolate production