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North American Metal Packaging Alliance Strongly Supports Sound Science to Guide Policy on BPA

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The North American Metal Packaging Alliance (NAMPA) acknowledges the release yesterday of a manuscript on Bisphenol A (BPA) that reportedly has been accepted for publication in *Reproductive Toxicology.* Based on a preliminary review of the paper, it appears that the manuscript yields conclusions that are inconsistent with numerous studies, independent risk assessments, and government reviews that have rejected the hypothesis of a low dose effect from BPA.

NAMPA strongly supports the development of sound science, is committed to the safety of the metal packaging products its members produce, and believes firmly in the critical need for new and relevant information to be subjected to the rigorous standards of established scientific peer review processes *before* judgment on the scientific validity of new information, and its potential relevance to human health, can reliably be established.

NAMPA is carefully reviewing the manuscript, but believes that its findings must be subjected to traditional independent scientific peer review processes both to assess the study's scientific integrity and validity, and to determine the relevance of the study's findings to human health before any judgment can be made as to the study's validity. NAMPA regrets that the study, which has not yet been published in final form, has received no independent critical scientific review, and has not undergone any of the rigorous scientific reviews that are essential to preserve the public's confidence in the integrity of our scientific review process, which appears to be a key reason behind the announcement yesterday by the U.S. House of Representatives Committee on Energy and Commerce and the Subcommittee on Oversight and Investigations to undertake an investigation of uses of BPA, particularly those involving infants and children. NAMPA requests that the study immediately be subjected to the standard scientific review processes and believes that no credible judgment can be made regarding the study's findings until this scientific review process has run its course. Public confidence deserves nothing less than the highest standards of scientific review. To support this request, NAMPA provides the below additional background on BPA and its use in the metal packaging industry.

- BPA is used to make polycarbonate plastic and epoxy can coatings. These materials are approved for use in direct contact with food by regulatory bodies around the world and have been used safely in food contact applications for over 60 years. BPA is also one of the most extensively studied chemicals in use today, and its safety continues to be reaffirmed by risk assessments from around the world.

- Over the last two years, comprehensive risk assessments have been performed by the European Food Safety Authority (EFSA), the U.S. National Toxicology Program's Center for the Evaluation of Risks to Human Reproduction (CERHR), and the Japanese National Institute for Advanced Industrial Science and Technology. Each of these assessments supports the use of BPA in direct contact with food. In fact, EFSA found appropriate evidence of safety to support a five-fold increase in the allowable BPA level in food. All of these reviews were conducted by independent expert panels who review all of the relevant science on BPA. The reviewers use the most modern criteria for scientific evaluation to judge published studies on BPA. These risk assessments continue to support the safety of BPA when used in food contact applications and have rejected the low dose theory.

- Much of the recent media coverage has stated that there is scientific uncertainty about the safety of BPA. In fact, the science on the safety of BPA has very little uncertainty; expert independent panels have reconfirmed that fact. Some researchers have proposed the hypothesis of a low dose effect from BPA exposure. They have also stated that the expert panel risk assessments have not taken this hypothesis into account. In contrast, the expert EFSA panel addressed the low dose hypothesis by stating that none of the studies that support this hypothesis were performed to the standards required to be considered for review (http://www.efsa.europa.eu/en/science/afc/afc_opinions/bisphenol_a.html). The CERHR panel noted, "The lack of reproducibility of the low dose effects, the absence of toxicity in those low-dose-affected tissues at high doses,

and the uncertain adversity of the reported effects led the panel to express "minimal" concern for reproductive effects" (http://cerhr.niehs.nih.gov/chemicals/bisphenol/BPAFinalEPVF112607.pdf). The researchers proposing this low dose hypothesis have also stated that these panels did not take into consideration infant exposure to BPA, again this is incorrect. The EFSA expert panel stated, "In its evaluation the Panel gave special attention to infants and children" (http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_BisphenolAFAQs.htm). In its report, the panel noted that infants would need to consume hundreds of times the amount of BPA found in canned food to approach any safety concerns.

NAMPA takes very seriously any safety issues related to metal packaging and we have continued to follow the science around this issue. We strongly feel that the science on the issues related to canned food safety is not in question and we fully support the established scientific review process that has served the public for decades. We also strongly encourage the scientists who have proposed hypotheses suggesting there are safety issues related to BPA to engage that scientific process and allow science to guide public safety policy, instead of media accusations. The low dose hypothesis has been considered by the established scientific community and dismissed. We encourage all new and relevant information to be brought forward to the established scientific review processes for a fair judgment of its scientific validity. This review process must be followed to allow the public to have confidence in the safety of the nation's food supply.

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