



## **SAFETY OF BISPHENOL A (BPA) IN FOOD & BEVERAGE PACKAGING**

*Product safety is the top priority for the food and beverage industry. We agree with recent reaffirmations by HHS and FDA that baby bottles, infant sipping cups, canned infant formula and other foods in cans and packages that utilize BPA are safe, and that there is no need for consumers to change their consumption habits. That position is supported by the findings of numerous food safety agencies around the globe, including the European Food Safety Authority, the World Health Organization, the Japanese National Institute of Advanced Industrial Science and Technology and Health Canada.*

*As new research and studies are conducted, it is the obligation of our industry and the appropriate regulatory authorities to review that evidence and make the appropriate decisions that ensure the continued safety of our products. While the FDA currently conducts a new BPA safety assessment, the National Institutes of Health (NIH) will also devote \$30 million to a two-year study of the safety of BPA. These two projects will add to the already robust catalogue of scientific evidence on BPA.*

### **Background – replacing BPA is a food safety challenge**

Bisphenol A (BPA) is approved by the U.S. Food and Drug Administration for use in food contact applications. For more than 40 years BPA has played an essential role in food preservation. The US Food & Drug Administration (FDA) and the European Food Safety Authority have both found existing uses of BPA to be safe for consumers of all ages. FDA and other regulatory agencies continue to evaluate the safety of BPA on an ongoing basis.

BPA is an ingredient used in many rigid plastics (e.g. bottles, cups). It is also used in thin linings for cans in which certain foods and beverages are packaged. Can linings are necessary to protect public health. Without them, interactions between the metal and the can contents over time eventually leads to corrosion and contamination of the food by dissolved metals, and to formation of container defects that allow entry into the product of microorganisms that cause spoilage or illness. The use of protective can linings slows down the rate of these interactions so much that modern canned foods, even high acid foods like fruits and vegetables, can be counted on to retain their nutrition, quality and consumer acceptability for years under a wide range of

environmental and handling conditions.

Contrary to what some claim, there is no across-the-board replacement for BPA in can linings. Each food product formulation has its own set of demands. Acidic foods and thermal processing present particular challenges. Once a candidate BPA replacement is identified, its performance must be ascertained over the entire shelf life of the food product, and its safety, regulatory approval and compliance with other applicable regulations must be assured before it can be commercially used. Retooling of can manufacturing and food processing equipment may be necessary. This would take several years.

**Regulators around the world have confirmed the safety of BPA**

*BPA is one of the most intensively studied manmade chemicals in use today*

The U.S. Food and Drug Administration (FDA) and food regulators around the world (e.g. European Food Safety Authority [EFSA] in EU, Germany, Japan, UK, Australia-New Zealand and Canada) have repeatedly confirmed the safety of BPA and continue to reaffirm the safety of BPA in light of new studies.

California's Developmental and Reproductive Toxicant Identification Committee experts reviewed all the scientific evidence on the safety of BPA and determined that BPA should not be listed as a reproductive or developmental toxicant under Proposition 65.

The World Health Organization (WHO) has found no basis to issue health warnings about BPA. Several other prominent international bodies also made the same determination, including the Health and Consumer Protection Directorate of the European Commission; the European Chemical Bureau of the European Union; the European Scientific Panel on Food Additives, Flavourings, Processing Aids, and Materials in Contact with Food; the Japanese National Institute of Advanced Industrial Science and Technology (NAIST); and the German Federal Bureau for Risk Assessment.

The US Centers for Disease Control and Prevention (CDC) published biomonitoring data from a large-scale study that represents the entire US population aged 2 months and older. The data show that typical human daily intake of BPA is one million times less than the levels that showed no adverse effects in multi-generation animal studies, and one thousand times less than the very conservative regulatory limits set by the US and European governments.

A recent peer-reviewed publication by U.S. Environmental Protection Agency researchers found no evidence of low dose effects from BPA in sensitive laboratory animals.

Based on the entire body of scientific evidence and the findings of the FDA and

numerous health authorities and researchers consumers should not alter their buying or eating patterns due to concerns about BPA.

### **Industry Position**

Product safety and regulatory decisions are made on the entire body of scientific evidence, which to date supports the safety of BPA. As new science, research and studies are conducted, it is the obligation of our industry and the appropriate regulatory authorities to review that evidence and make the appropriate decisions that ensure the continued safety of our products.

FDA is currently conducting a new BPA safety assessment and the National Institutes of Health (NIH) is also devoting \$30 million to a two-year study of the safety of BPA. These two projects will add to the already robust catalogue of scientific evidence on BPA.

As opposed to jumping ahead of the important ongoing work of FDA and NIH, we should wait and follow the science.

GMA supports the FDA's current advice to consumers that food and beverages in packages using bisphenol A (BPA) as a food safety barrier are safe and that packaging that may contain trace amounts of BPA are safe for use with food. We agree with FDA that there is no need for consumers to change their purchasing or consumption patterns.

Using defensible and repeatable science generated according to guidelines prescribed by regulatory authorities, industry advocates are working to inform legislative bodies to defeat unnecessary bans and restrictions at the state and local level, or to narrow them as much as possible.

Contrary to media reports, there is no replacement for BPA that will work for all foods and metal packaging applications, because food formulations and processing requirements differ. Importantly, acidic foods and foods packaged using thermal processing techniques present unique challenges that are specifically difficult to address. Effective can linings that are free of BPA will be especially difficult to achieve.

The process to find a replacement for BPA that will work in all applications will take time. This is because both the safety and quality of the food as well as the performance of the alternative must be confirmed over the entire shelf life of every food product – container combination. Also, the time it would take for companies to actually make the transition to a suitable alternative could be very lengthy given the potential changes can manufacturers and food processors would have to make in their equipment and operations.

An immediate ban on BPA is not realistic and will result in the loss of safe and necessary canned and jarred consumer products like the following:

- Infant formula, liquid and powder
- Baby food
- Yogurt
- Applesauce
- Ice cream
- Fruits
- Vegetables
- Sauces
- Olives
- Pickles
- Tuna and other seafood
- Pasta
- Beans
- Soup
- Chili
- Whipped Toppings
- Chicken
- Sausages
- Meats
- Milk, condensed and evaporated
- Juice

\*\* Items sold in plastic or paper with a metal peelable lid, or any jar with a "pop seal" lid would also likely be impacted.