



About NAMPA

The North American Metal Packaging Alliance, Inc. (NAMPA) is committed to promoting sound science in risk-based decision-making pertinent to the light metal packaging industry, advocating on behalf of the light metal packaging industry on issues pertinent to packaging technologies, and providing customers with needed information regarding light metal packaging technologies and the regulatory frameworks in which these technologies are assessed.

John M. Rost, Ph.D.
Chairman

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NAMPA NEWS

MESSAGE FROM THE CHAIRMAN

The Value of Objective Science

Hardly a day goes by without some new study on bisphenol A (BPA) making headlines somewhere in the world. Not surprisingly, the articles sensationalize any conclusion (legitimate or otherwise) linking BPA exposure to a negative impact on human health, with little regard to the details of the actual study. As we have all seen, the constant barrage of such articles begs the question why this chemical is still in use given all its potential health impacts.

Unfortunately, in the rush to judgment via headlines, the question that is all too often overlooked is what does each study really mean for human health? How was the study conducted? Are the findings relevant to human health? Are the findings repeatable? The answers to those questions underscore the value of, and the need for, objective science. To understand whether BPA, or any substance for that matter, represents a true risk to people, it is necessary to look at scientific studies as objectively as possible. In today's world, however, as reporters, politicians, environmentalists, and yes, even industry, compete for consumers' attention, it is more and more difficult to recognize, or hear the voice of, those representing objective science.

So just what is objective science? If you start with the basics, the definition of "*objective*" as listed online by Businessdictionary.com is:

"Neutral or bias free, relating to, or based on, verifiable evidence or phenomenon instead of on attitude, belief, or opinion."

The key words in that definition are "bias free" and "based on verifiable evidence." That is particularly important when it comes to research on BPA, and even more crucial, to evaluating the significance of any given scientific study in regard to human health. Hundreds of studies on BPA exist, but regulatory and scientific experts have appropriately dismissed many because their results are simply not verifiable. If results cannot be reproduced, there is no way to know with certainty if the findings are valid or if the results are biased by the interpretation of the researcher.

The question of bias is an important one in the realm of scientific study, since bias can be obvious or it can be subtle. Industry-funded studies on BPA are often criticized as biased because of the presumed vested-interest a company or industry has in seeing its substance or product found safe. Yet, those of us in the chemical industry, in particular, are acutely aware of that potential characterization. Indeed, it was because of this very concern that Good Laboratory Practices (GLP), a system of management controls for laboratories engaged in chemical testing, were developed in the 1970s. That is why we routinely seek out third party, independent laboratories that test under GLPs to conduct scientific studies. Still, the charge of bias remains.

All media characterizations aside, studies conducted in purely academic settings also are subject to bias, albeit of a different sort. For the academician who relies on grant money to fund his/her research, there is no disputing that future research funding is heavily dependent on the results of their most current work. From a practical standpoint, a research study with no significant or interesting findings is unlikely to get published. The unpublished study may be critical to the overall understanding of the test substance and its safety or relevance to human health, yet because it lacks scientifically interesting results, it fails to enhance a researchers' ability to obtain future grant money.

So where does that leave the consumer, who ends up caught in the middle? Ironically, the best source for unbiased research on chemical safety may be the federal government. Funding provided by the government to researchers at independent laboratories, outside the influence of those with an agenda, offers the best chance for findings that represent objective science.

Several such government-funded studies recently have been completed in the U.S., offering reassuring and **verifiable** evidence regarding the safety of BPA. The most notable is a first-of-its-kind human exposure study, funded entirely by the U.S. Environmental Protection Agency (EPA) and conducted by a team of expert researchers from the Pacific Northwest National Laboratory (PNNL), the U.S. Food and Drug Administration (FDA), and the Centers for Disease Control and Prevention (CDC). Researchers found that even when a typical diet was altered to ensure that high concentrations of BPA were ingested, the levels of non-metabolized BPA (*i.e.*, "free" BPA) in blood were below the level of detection, providing definitive evidence that adverse health effects from BPA are highly unlikely. Two other animal studies by the FDA addressed concerns about early childhood exposure to BPA. One (Doerge *et al.*) found that maternal exposures to BPA are not transmitted to the fetus; the other (Ferguson *et. al.*) demonstrated that low doses of BPA do not cause developmental changes in test animals.

These latest government studies, along with studies and reviews completed by international organizations such as the World Health

Organization and the European Food Safety Authority (EFSA), as well as government agencies in Germany, Japan, and Australia and New Zealand, are the best resource for consumers looking for answers. They also offer the best hope that objective science is alive and well and that its value has not been forgotten.

BPA SCIENTIFIC DEVELOPMENTS

Below are highlights of the major scientific research studies that have been released in the past few months that confirm current exposure levels of BPA are safe:

Teeguarden *et al.*, 2011 -- “Twenty-four hour human urine and serum profiles of bisphenol A during high-dietary exposure” -- A study funded by EPA, and conducted by researchers from PNNL, FDA, and CDC, found that levels of BPA in the bloodstream are undetectable. For more information, click [here](#).

Doerge *et al.*, 2011 -- “Distribution of bisphenol A into tissues of adult, neonatal, and fetal Sprague-Dawley rats” -- Researchers from the National Center for Toxicological Research published findings showing that un-metabolized or “free” BPA was undetectable in the rat fetuses at any time following maternal oral exposure of BPA. The September study provides evidence that ingesting trace amounts of BPA from food or beverages does not pose health questions. For more information, click [here](#).

Ferguson *et al.*, 2011 -- “Developmental Treatment with Bisphenol A or Ethinyl Estradiol Causes Few Alterations on Early Prewaning Measures” -- A July study, funded and conducted by FDA, found that low doses of BPA do not cause developmental changes in test animals. The findings confirm previous findings that oral BPA exposure does not alter development. View more information on the study [here](#).

NAMPA NEWS BRIEFS

International Actions on BPA

FRANCE -- Despite the most recent scientific review reaffirming the safety of BPA from EFSA, legislative and regulatory actions to ban BPA are moving forward in France. The action may have been prompted by a report issued by the Agency for Food Health Safety (ANSES). In its summary, ANSES identified studies that confirmed the low dose theory to cause harm in animals and recommended limiting exposure to the chemical. The ANSES findings will be delivered to EFSA for review and consideration. In the past, EFSA has rejected many of the studies included in the ANSES report as flawed, due to inappropriate routes of exposure, lack of replicability, and/or inappropriate study design.

In response to the ANSES report, the French ecology minister, Nathalie Kosciusko-Morizet, called for a nationwide labeling requirement for food containers made with BPA. Meanwhile, the legislature proposed a more severe action --a nationwide ban of BPA from all food contact materials. On September 28, the Committee on Social Affairs voted on the legislative proposal, which was approved by the French National Assembly on October 12. Containers aimed at children under three are required to be BPA-free by the start of 2013, with a full ban on BPA in food contact materials by 2014. The French Senate is expected to take up the measure in November. If passed, action will shift to the European Commission, which will have three months to review the measure.

JAPAN -- RISS, part of Japan's National Institute of Advanced Industrial Science and Technology (AIST), completed a six-year project examining a range of concerns on the use of BPA. After an assessment of published, peer-reviewed studies since 2005 on the reproductive toxicity, neurotoxicity, and carcinogenicity from BPA exposure, scientists at the organization came to the conclusion that the risk to human health from BPA exposure is "very small."

CHINA --The Ministry of Health, and five other government agencies in China, issued a notice calling for an end to the production of infant nursing bottles made with BPA on or after June 1, 2011. They also banned the import and sale of infant nursing bottles made with BPA on or after September 1, 2011.

BRAZIL -- The Brazilian National Health Surveillance Agency (ANVISA) has banned the production, import and sale of baby bottles containing BPA. The ban on the manufacture and import of BPA will enter into force on December 18, 2011 (the ban goes into effect 90 days after the ban was published by Brazilian official press on September 19, 2011). Any products manufactured or imported with BPA up until December 18, 2011, may continue to be sold up until December 31, 2011.

U.S. Regulatory Actions on BPA

EPA -- EPA has continued its efforts to assess BPA's effect in the environment. EPA issued an advanced notice of proposed rulemaking (ANPRM), which outlines EPA's proposal for processors and users of epoxy resin to sample and monitor BPA levels in certain environmental media, including soil, drinking water, and ground water. EPA reportedly would use this information to determine where risk management efforts may be needed if BPA is determined to be toxic to aquatic life or environmental systems. The proposal does not specify how long such monitoring would need to occur or how often. On behalf of the membership, NAMPA submitted comments outlining industry's concerns

with EPA's proposal.

FDA -- On September 19, 2011, the American Chemistry Council filed a petition with FDA to amend the currently approved food application regulations to clarify for consumers that BPA is no longer used to manufacture baby bottles and sippy cups and that it will not be used in these products in the future. FDA has acknowledged the request and has indicated it intends to proceed with an amendment. The regulatory revision will have an impact on FDA's ongoing exposure assessment, by removing polycarbonate baby bottles and sippy cups from the overall assessment of route and amount of exposure to young children.

Recycling Rate of Aluminum Cans Reaches an 11-Year High

The rate of recycling for aluminum beverage cans jumped to the highest level in over a decade, with 58.1% of aluminum cans being recycled in 2010. According to the Canned Manufacturer's Institute (CMI), the Aluminum Association, and the Institute of Scrap Recycling Industries (ISRI), the rate of recycling for aluminum cans is also nearly double that of any other beverage container. Nearly 56 billion cans were recycled last year, with industry groups hoping to increase the level of recycling in years to come. The Aluminum Association has set a goal to have 75% of all aluminum beverage cans recycled by 2015.

Harvard Study Finds Consumers Willing to Pay for Food Safety

As NAMPA members well know, when it comes to food safety, the benefits of metal food packaging offer an unparalleled safety record with no case of food borne illness resulting from a failure of metal packaging in over 30 years. That track record should be of particular interest in light of a new study recently published by researchers with the Harvard Center for Risk Analysis. The study, published in the September issue of the journal, *Risk Analysis*, was designed to assess the monetary value that consumers place on a safer food supply. Researchers surveyed 2,858 randomly selected adults across the nation to determine their willingness to pay for a food safety program that would reduce the risks associated with eating chicken, ground beef, or packaged deli meats. The results showed that consumers would be willing to spend between \$4,500 and \$6,500 to avert each case of short-term illness. Ironically, consumers interested in food safety need only to look to canned foods to avoid illness, without any extra cost. View the full study at onlinelibrary.wiley.com/doi/10.1111/j.1539-6924.2011.01617.x/full.

NAMPA in the News

Over the past few months, NAMPA assumed a lead role in disseminating details to the public about new, critically important scientific studies on BPA. NAMPA provided media releases on the

Teeguarden, Doerge, and Ferguson studies highlighted above, as well as the recent Japanese Research Institute of Science for Safety and Sustainability (RISS) assessment on BPA. NAMPA's action prompted coverage in *Food and Chemical Policy*, *WebMD*, *Packaging Digest*, *Food Production Daily*, and other outlets. NAMPA also responded to the "supermarket survey" of canned foods conducted by the Breast Cancer Fund, which led to coverage in *WebMD*, *Greenwire*, *Chemical Watch*, *Inside Prevention*, *Forbes*, and others.

NAMPA WEBSITE

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