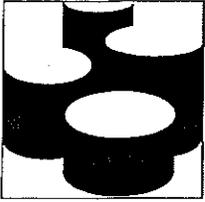


February 26, 2009

Can Manufacturers



Institute

Environment Committee
Room 3200, Legislative Office Building
Hartford, CT 06106

Re: Legislative Impacts: CT H.B. 6572 and S.B. 791

The Can Manufacturers Institute and its members are committed to providing safe, nutritious and refreshing canned food and beverages to consumers. CMI members produce 135 billion food, beverage and general line metal cans in the U.S. CMI members employ some 22,000 people with 132 plants in 33 states (plus PR and Am Samoa).

The bills seek to limit children's exposure to bisphenol-A (BPA) by eliminating BPA in packaging for products intended for children under the age of three. Such a ban would inevitably undermine food safety and significantly reduce the availability of food products for both children and adults.

BPA is a key ingredient of the epoxy resins used in metal food packaging to prevent spoilage and contamination. Removal of BPA from food packaging would have serious implications.

Passage of the Bills would impact consumers of all ages as outlined below:

Compromises Food Safety: A ban on BPA as required by the Bills eliminates a key component in metal packaging that is critical to the safety of food and beverages. BPA-based epoxy resin coatings are essential to prevent contamination and deterioration and spoilage of food products stored and distributed in metal packaging. At this time there is no alternative to epoxy-resin coatings in metal food and beverage packaging that is effective for the broad range of canned products.

Would Disrupt Food Chain: When it comes to the majority of canned products, foods and beverages are not segmented based on who is going to consume them. Distinguishing metal packaged products for children from those intended for the general population is a gross oversimplification. Everyday canned food products, such as green beans and tomato sauce, are just as likely to be consumed by toddlers as their older siblings and parents. The target consumer is not a valid differentiating factor in the metal package design. Rather, what dictates can design includes far more complex factors, such as food type, sterilization process, container manufacturing technology, metal substrate and coating performance characteristics.

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Risk to Product Availability: This legislation would be disruptive to the entire food manufacturing and distribution chain. Passage of the Bills will prompt food and beverage companies to rethink the products they produce for the Connecticut market. Companies are likely to be reluctant to distribute in Connecticut any metal packaged food or beverage product that could have even a remote potential for being consumed by children under the age of three.

For the reasons outlined above, we request you oppose H.B. 6572 and S.B. 791.

There are approximately 90 billion food and beverage cans produced annually which American families rely on for nutrition and refreshment (not including beer).

Please contact me at 202-232-4677 or gcullen@cancentral.com with any questions.

Sincerely,



Geoffrey Cullen
Director of Government Relations
CMI