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Testimony of
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North American Metal Packaging Alliance, Inc.
On
H.B. No. 5116
Environment Committee
March 7, 2012

I am Dr. John Rost. I am here today representing the North American Metal Packaging Alliance, Inc. (NAMPA). I am pleased for this opportunity to testify.

NAMPA is a not-for-profit trade association committed to protecting health through the safety of metal packaging and metal packaged foods. NAMPA is extremely concerned with this proposed legislation because it will result in reduced food safety protection for Connecticut citizens.

Background on Cans and Can Coatings

Before we get started, it might help to give some background information on cans and can coatings.

As we consider the simple can, we should keep in mind all the great things it enables -- it maintains food and beverages under severe conditions, keeps an airtight seal even under high pressure, withstands damage during handling and shipping, and prevents changes to food taste, odor, appearance, and texture -- all at an extremely low cost to the consumer.

With this in mind, there are a number of critical performance characteristics that can manufacturers look for in a can coating:

1. Corrosion Resistance -- This is a critical factor for food safety. The can coating must provide corrosion protection so that the food product does not interact with the metal packaging. Otherwise, the metal can may develop tiny holes or perforations from which bacteria and other microbes can enter, which can cause food poisoning. Corrosion resistance is what allows canned foods to have long shelf-lives.

2. Adhesion -- The can coating must adhere to the metal material, without flaking off or fracturing, as the can is manufactured. It should also be able to withstand high-temperature sterilization used for certain food products.

3. Consumer Acceptance -- The can coating should not impart any adverse odor or taste to the food product.

Finally, it is important to remember that anything that comes in contact with food will migrate trace levels of that material into the food. That fact does not change whether you transition away from current can coatings in metal packaging or transition to other packaging altogether.

Adverse Consequences for Food Safety

Bisphenol A (BPA) is an essential component in the epoxy resin coatings used in metal food packaging. Of the can coating technologies available, epoxy coatings provide the highest level of corrosion resistance, shelf-life, and food protection. They are resistant to the wide range of chemistries found in food and beverage products and are resistant to scratching and cracking when dented. These attributes are critical in maintaining the sterility of the food product.

The high temperature sterilization, coupled with the continuous product protection enabled by the epoxy-based coatings, eliminates the dangers of food poisoning from microbial contaminants. From a safety perspective, metal packaging with the use of epoxy coatings has an unprecedented safety record in which, according to the U.S. Food and Drug Administration (FDA), there has not been a food-borne illness case resulting from the failure of metal packaging in over 35 years. That is zero failures resulting in a food-borne illness case with several trillions of cans produced.

According to the Centers for Disease Control and Prevention (CDC), 3,000 people die in the U.S. each year due to food hazards and over 128,000 are hospitalized for food-borne illness. According to a 2010 Pew Research report, the economic impact of food-borne illness averages $1,850 per U.S. citizen each year.

We cannot dismiss the essential role of epoxy resin coatings in protecting against these very real, costly, and tragic results. We urge legislators to consider that the use of BPA in epoxy coatings in metal packaging provides real, critically important, and measurable health benefits. By reducing the potential for the serious and often deadly effects from food-borne illnesses, epoxy coated metal packaging protects human health. As the industry that is responsible for providing packaging that ensures safe and nutritious food, we are seriously concerned about the impact on food safety if this legislation passes. It will, in fact and reality, encourage the citizens of Connecticut to move away from a proven method for ensuring food safety, and put their health at risk.

Proposal to Restrict BPA Is Not Supported by Science

We remind Committee members that BPA has repeatedly been reviewed by competent food safety authorities worldwide and been found to be safe. The European Food Safety Authority, the U.S. FDA, Health Canada, the United Kingdom Food Standards Agency, the German Federal Institute of Risk Assessment, the Food Standards Australia New Zealand, and the Japanese Ministry of Health have studied BPA within the last few years and each agency concluded that BPA is safe for use in approved food contact applications. We urge you to recognize that public policy on scientific matters should be guided by scientific facts and expertise.

Conclusion

Metal packaging of foods continues to be one of the safest and most sustainable ways to deliver food to the world. BPA-based epoxy coatings provide protection that eliminates the danger of food poisoning or contamination. There is no valid scientific reason to require labeling on canned products that would urge consumers to avoid this packaging technology and potentially put their health at risk.

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About NAMPA

The North American Metal Packaging Alliance, Inc. and its members support sound science and trust the scientific review process that has protected our food supply for decades. For further information, visit www.metal-pack.org.