

Mr Martin Hickman
Consumer Affairs Correspondent
The Independent
2 Derry Street,
London
W8 5HF



1st April 2010

Dear Mr Hickman

Your recent focus on Bisphenol A (BPA) ("*Leading British retailers selling products banned in Canada and US*" and "*Bad chemistry: The poison in the plastic that surrounds us*") of 31 March (and subsequent articles) forgets to mention one critical fact, that parents have nothing to fear when using products based on BPA as intended.

It is important to fully understand the facts about the substance;

- The monomer BPA serves as an intermediate and is the basic building block for polycarbonates and epoxy resins. Consumer products contain only technically unavoidable trace amounts of BPA.
- Many uses of BPA are critical to the protection of human health. The heat and shatter resistant qualities of polycarbonate plastic containers, such as baby bottles, allow for improved safety and greater hygiene when cleaning at higher temperatures. Additionally, epoxy resins, used as the coating in most food and beverage cans, help to protect the safety of food. Without them, food would rot in the can before you had a chance to open it.
- BPA has been thoroughly "risk-assessed" by Europe-wide independent experts. They conclude that it poses no risk to consumers from its applications. These risk assessments are widely recognised as one of the world's most rigorous scientific analyses of a substance's safety, covering the whole life cycle of the substance, from its production, processing and use through to its disposal. For the BPA Risk Assessment, independent scientific experts from EU Members States considered several hundreds of studies that had appeared during recent years.
- Recently, the European Food Safety Authority (EFSA) clearly confirmed that food contact materials such as polycarbonate plastic baby bottles and drinking bottles and epoxy resin-coated food and drink cans are safe for their intended uses. These opinions have included new information published since the finalisation of the EU Risk Assessment and assess the whole body of literature available.

Naturally, industry is guided by the opinions of Europe's independent risk assessors and has and will continue to observe European regulation concerning its products. In this case, EU regulation is guided by the outcomes of the European Risk Assessment process and the opinions of the European Food Safety Authority (EFSA) which rely on



the soundest science available. We think it is important that the choices people make are informed by sound science.

The piece's focus also ignores the fact, which has been emphasized by many regulatory authorities, that unjustified and hasty moves to restrict BPA may force producers to move to less tested alternatives. In essence replacing a known with an unknown quantity.

Additionally, BPA does not fulfil the scientific definition of an endocrine disruptor as claimed in your article. BPA was not specifically synthesised to be used as a hormone, but was screened together with many other substances in the 1930s and failed to show relevant potency. Like many naturally-occurring products and everyday foodstuffs such as carrots, soy beans or other vegetables, BPA shows very weak, oestrogen-like effects, and only at extremely high levels. Such levels can realistically never be reached in daily life.

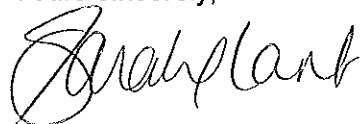
The studies you mention supporting the "low dose" theory have repeatedly been judged by independent regulators as unreliable for use in human risk assessment. Only this week, the US Environmental Protection Agency publicly underlined that "Regulatory authorities around the world that have reviewed these low-dose studies have generally concluded that they are insufficient for use in risk assessment because of a variety of flaws in some of the study designs, scientific uncertainty concerning the relevance to health and ecological hazard of the reported effects, and the inability of other researchers to reproduce the effects in standardized studies."¹

The story furthermore quotes frequently the assessment of Canada. It does not point out that Canada's own risk assessment of BPA also affirms that "*the current research tells us the general public need not be concerned*" because current low-level exposure to BPA "*does not pose a health risk.*" This is also consistent with assessments conducted by regulatory authorities from around the world, which have all concluded that current exposures to BPA present no significant risk to human health.

Over 50 years of research and extensive use throughout the world provide evidence that products made from materials based on BPA are safe for their intended uses. Furthermore, national scientific experts of food safety authorities of European Member States are currently discussing ongoing scientific work with regard to BPA in a scientific consultation. The result of their consultation are expected to be published in May.

Further information on the safety and benefits of BPA can be found at: www.bisphenol-a-europe.org.

Yours sincerely,



Sarah Plant
Senior Executive – Industrial Issues

Cc. Roger Alton, Editor, The Independent
Peter Davis, British Plastics Federation
Philip Law, British Plastics Federation
Jasmin Bird, PlasticsEurope

¹ <http://www.epa.gov/oppt/existingchemicals/pubs/actionplans/bpa.html>