



**Jennifer Rogers, MPH**  
**Programs and Policy Director, Reproductive Health Technologies Project**  
**Testimony to the Bisphenol A Subcommittee of the Science Board to the**  
**Food and Drug Administration**  
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We want to thank the FDA's Science Board Bisphenol A Subcommittee for convening this meeting to discuss BPA for use in food contact applications. My name is Jennifer Rogers and I am Programs and Policy Director of the Reproductive Health Technologies Project (RHTP). RHTP is a national nonprofit advocacy organization. Our mission is to advance the ability of every woman of any age to achieve full reproductive freedom with access to the safest, most effective and appropriate technologies for ensuring her health and controlling her fertility. At RHTP, our work focuses on a broad range of national public health policies, and we have often depended upon the scientific evidence provided by agency reports to help guide our programs and policies. RHTP does not accept any funding from for profit companies, drug or device manufacturers.

As mentioned in previous testimonies, BPA is one of many synthetic endocrine-disruptor chemicals. Endocrine disrupting chemicals mimic or block hormones and disrupt the body's normal reproductive functions. A growing body of evidence indicates that endocrine disrupting chemicals, including BPA, are harmful to the developing fetus, infant, and child, even at low levels. Moreover, numerous studies have found that these chemicals are associated with a host of reproductive health problems in both men and women.

The FDA plays a critical regulatory role in BPA's use in plastic food containers, bottles, tableware and the plastic linings of canned foods. RHTP is concerned with the FDA draft report that has declared BPA safe for use in these items, based exclusively on two studies, both of which are funded by industry and both of which use animal models which have been shown to be nonresponsive to estrogen.

We understand these two studies are compliant with Good Laboratory Practice (GLP) but we question why the FDA has not included hundreds of other high quality, peer reviewed research published on BPA and its impact on health in its review. Rigorous scientific studies published in reputable and peer-reviewed journals should help inform any public health risk assessment and have been included in assessments carried out by other federal agencies, including two reviews completed by the National Institutes of Health. The new study released in JAMA underscores this point.

Evidence-based, peer-reviewed science has long served as the "gold standard" for policymaking and regulatory decisions for many federal agencies, particularly those dealing with chemicals, health, and the environment. As a society we have come to depend upon the government to utilize scientific findings to develop sound public policy that advances the well-being of our citizens. Of concern to RHTP, and many organizations within and outside of the women's health community, is a growing trend by the government to manipulate science to advance political and corporate interests over the health and safety of Americans.

We hope as the FDA reviews the BPA draft report that the scope of research included in its safety assessment is broadened to take into account the hundreds of research studies published in peer-reviewed journals by independent scientists as well as the several reports released from other agencies, including the National Toxicology Program, that have come to different conclusions on the safety of this chemical.