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Patricia Verduin, Ph.D.
Senior Vice President and Director
Office of Product Quality and Development

Dr. Paul Gilman
Assistant Administrator for the Office of Research and Development
U.S. Environmental Protection Agency
Mail Drop: 8101R
1200 Pennsylvania Avenue NW
Washington, DC 20460

Reference: Study of Microwave Popcorn Emissions Released During Cooking and Bag Opening - Jacky Rosati and Ken Krebs, National Risk Management Research Laboratory (NRMRL), Indoor Environments Management Branch

Dear Dr. Gilman:

We want to thank the U.S. EPA for taking an interest in the consumer health and safety of butter flavorings in the Microwave (MW) Popcorn products marketed in the USA. As the market leader in this category, we firmly believe in the importance of assuring the consumer health and safety of this product category. We support the EPA's efforts and, as you may well be aware, have been working hand in hand with your Indoor Environment Management Branch of NRMRL to create the knowledge needed to assure the safety of these flavorings.

The MW Popcorn market is a substantial snack food category topping 3 billion bags annually and over \$ 1 billion in retail value. This product category is directly responsible for the employment of 5,000 workers and supports a significant portion of the agricultural sector of our economy. We believe that it is imperative that the health and safety of this product be assured to the extent possible within the very near future. Continued uncertainty affects consumer confidence and the long-term viability of the product category.

Throughout the past year, in order to fully assess the consumer health and safety of the butter flavors in MW popcorn and to complement the work of the EPA, ConAgra Foods, Inc., retained consultative and laboratory services to ascertain the point source of compounds of interest and develop a migration mass balance understanding. We also formed a panel of experts that developed a Consumer Exposure Risk Index to address the potential health concerns of the identified migrants. The expertise of the panel

included inhalation toxicology, chemical and structure activity, and pulmonology/occupational medicine.

In order to complete our joint efforts to address the consumer health and safety concerns of heating MW popcorn flavors in the preparation of MW popcorn, we need EPA's Office of Research and Development's commitment to take the following steps:

1. Complete the Indoor Environments Management Division's Phase II research including quantification of compounds identified in Phase I, internal review, and issuance of results.
2. Participate in methodology correlation to substantiate ConAgra point source mass balance recovery work with EPA popping emission recovery study.
3. Review and qualify a Quality Assurance Project Plan (QAPP) including screening protocols for industry association review (e.g. ASTM) and adoption. These QAPPs would form a basis for self-policing within the industry.
4. Peer Review the Consumer Exposure Assessment developed by ConAgra. This would involve the EPA convening its own panel of experts, including members from NRMRL, NCEA, and NHEERL.

The cooperation of ConAgra Foods and the EPA has yielded a comprehensive understanding of butter flavor emissions for consumers. The next step is to validate these levels and provide a procedure to allow for industry-wide acceptance and compliance. Additionally, ConAgra Foods is at a point of needing validation of both the analytical data it has produced and the Exposure Risk Index developed by its panel of experts as to the health effects of butter flavors for the Consumer.

It is our opinion that all four steps above are necessary for the MW popcorn industry to self-police our products and continue to assure consumer health, safety and satisfaction.

We appreciate your assistance in accomplishing the four steps above. Thank you again for your support in this effort.

Best regards,



Patricia Verduin, PhD.
Senior Vice President Product Quality & Development
ConAgra Foods, Inc

CC: Paul Lapadat, COO, Snack Foods Group
Sandra Morar, Esquire