

## Joint Statement to Mrs Androulla Vassiliou, European Health Commissioner

*We, the undersigned 42 organisations from 12 member states representing a wide range of consumer groups, food and health charities, and parents, call on the European Commissioner to employ the precautionary principle by suspending use of certain food colourings found to affect the activity and attention of children.*

We ask, where there is uncertainty surrounding the safety of a purely cosmetic food ingredient, what possible purpose is served by its continued presence in our food? The European Food Safety Authority's (EFSA) recently published opinion on the UK Food Standards Agency's (FSA) "Southampton Study"<sup>1</sup> acknowledged that mixtures including the six colourings and one preservative in question had an effect on children's behaviour, yet recommended no reduction in the Acceptable Daily Intake (ADI). In doing so, The EFSA gave greater weight to the need to prove a substance 'harmful beyond any doubt' before removing it, than to the need to prove it harm/less in order to allow its use. We find the EFSA conclusion, that the Southampton Study gives no grounds for a reduction of the ADI for these ingredients, deeply disconcerting.

We call on the European Health Commissioner, as risk manager, to take a decision in favour of precaution and consumer protection. Use of the six colours should be suspended, and manufacturers should continue to seek alternatives. This is in line with what consumers want, and with current market trends.

It is our view that:

### ◆ **There are risks but no benefits**

**Risk:** The Southampton Study gives strong grounds to suggest that there *is* an appreciable risk associated with these additives, even at a much lower level than current ADIs allow for. That the Southampton study found *any* effect of dyes on behaviour was remarkable because a number of factors acted to decrease that effect. The subjects were children in two age groups (3-years and 8-9 year olds) in the general population, but *excluded* the most sensitive individuals: children being treated for ADHD.

EFSA recognised that doses used in the study were realistic. Though toxicology studies normally give exaggerated doses of the test chemicals, the Southampton Study used doses that only constituted between 2.5 and 20% of the ADI and *still* found an effect. The ADI should represent a level that can be ingested, even by sensitive individuals, over a lifetime without an appreciable health risk. In the UK, The Food Commission's identification of 1020 retail products<sup>2</sup> containing one or more of the additives in question, suggests that many children may consume much more dye than was used in the study.

**Benefit:** On the other hand the dyes serve no purpose but to colour food. Other food colours are available, and it is possible to omit food colouring additives completely, as in organic food. Thus, we see no benefit to the continued use of these colours.

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<sup>1</sup> The EFSA Journal. 2008;660:1-54.

<sup>2</sup> To see the full list: <http://www.actiononadditives.com>

◆ **Consumers do not support the continued use of the food colours**

In a March 2008 survey conducted by the Danish Consumer Council, just 2.7% of 1055 people surveyed agreed with the statement; “Authorities should not do anything more. As long as there is only a suspicion about the effect on sensitive children, this is not something that society should spend money investigating.”<sup>3</sup> EFSA’s recommendation therefore, that nothing be done, does not have strong support among Danish consumers. Similarly, an internet survey undertaken by Netmums of more than 1000 parents in the UK found that 87% wanted the additives from the Southampton Study removed from food, and that 98% were worried about the impact these additives have on their children's health and behaviour.<sup>4</sup>

◆ **Industry is already acting, but regulators are lagging behind**

The dyes featured in the Southampton Study are added to foods for purely cosmetic purposes. In response to consumer demand, manufacturers in many countries have started to reformulate products to exclude these dyes. For instance, at least 21 manufacturers in the UK and 45 manufacturers and retailers in Denmark, have recently indicated that they are working on, or intend to start working on re-formulations. This confirms that the dyes are not essential, and that manufacturers recognise that consumers do not want them in their food<sup>5</sup>

In conclusion, we cannot see any reason for continuing to use these food colourings in our food. There is, in fact, a strong case to argue that there is risk involved in doing so. The European Government has a responsibility to place the health of the consumer at the forefront of food policy, and to safeguard the wellbeing of children. To do nothing would seriously fail European consumers, and fall short of fulfilling the stated purpose for which the EFSA was initially formed.

*‘EFSA was created as part of a comprehensive programme to improve EU food safety, ensure a high level of consumer protection and restore and maintain confidence in the EU food supply.’*

EFSA website, [http://www.efsa.europa.eu/EFSA/efsa\\_locale-1178620753812\\_AboutEfsa.htm](http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_AboutEfsa.htm)

**Note**

The six food colourings which, along with the preservative E211 Sodium Benzoate, were featured in the Southampton Study:

- E102 Tartrazine
- E104 Quinoline Yellow
- E110 Sunset Yellow
- E122 Carmoisine
- E124 Ponceau 4R
- E129 Allura Red

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<sup>3</sup> <http://www.forbrugerraadet.dk/english/azo/azosurvey>

<sup>4</sup> Netmums survey [http://www.netmums.com/h/n/FOOD/food\\_nasties/ALL/576//](http://www.netmums.com/h/n/FOOD/food_nasties/ALL/576//)

<sup>5</sup> <https://www.fdf.org.uk/additives.aspx> and <http://www.forbrugerraadet.dk/english/azo/doc2>

**Signed:**

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