

Joint Statement to Mrs Androulla Vassiliou, European Health Commissioner

Date: 9th April 2008

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"¹ 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 *harmless* 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.

¹ The EFSA Journal. 2008;660:1-54.

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 products² 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.

◆ **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."³ 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.⁴

◆ **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 food⁵

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,

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

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

⁴ Netmums survey http://www.netmums.com/h/n/FOOD/food_nasties/ALL/576/

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

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

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

Signed:

Aado Luik

Director, Tallinn Consumer Advice and Information Centre, Estonia

Aisling Murtagh

Food and Health Researcher, Consumers' Association of Ireland

Alar Tamm

Director, Estonian Union for Child Welfare, Estonia

Alison Gehring

Senior Policy Officer, The Royal Society of Health, UK

Anna Glayzer

Co-ordinator, Action on Additives Campaign, UK

Annika Marniemi

Food Officer, The Finnish Consumers' Association, Finland

Asen Nenov
Bulgarian National Consumers Association, Bulgaria

Bengt Ingerstam
The Swedish Consumer Coalition, Sweden

Bente Hesselund Andersen
NOAH - Friends of the Earth, Denmark

Brynhildur Pétursdóttir
Neytendasamtökin, Consumer Association of Iceland

Camilla Udsen
Senior Food Adviser, Danish Consumer Council, Denmark

Cathy Court
Director, Netmums, UK

Charlotte Jeavons
Chair, National Oral Health Promotion Group (NOHPG), UK

Christian Ege
Chairman, The Ecological Council, Denmark

Conchy Martin Rey
International Relations Director, CECU (Confederacion de Consumidores y Usuarios),
Spain

David Smith
Policy Adviser, Welsh Food Alliance, UK

Dömölki Livia
National Association for Consumer Protection in Hungary

Dr Helen Crawley
Science Director, The Caroline Walker Trust, UK

Dr Nigel L Carter BDS LDC (RCS)
Chief Executive, British Dental Health Foundation, UK

Dr Tim Lobstein
Childhood Coordinator, International Obesity Task Force, UK

Eleni Alevritou
President, EKPIZO, Greece

Emma Hockridge
Campaigner, the Soil Association, UK

Fiona Bird
Founder, Stirrin' Stuff, Scotland, UK

Ghita Parry
Danish Diet & Nutrition Association, Denmark

Ilse Friis Madsen
Naestformand, Landsorganisationen Grøn Hverdag

Jan Bertoft
Secretary General, Swedish Consumers' Association, Sweden

Jessica Mitchell
Director, The Food Commission, UK

Klaus Melvin Jensen
Campaign manager, Active Consumers (Aktive Forbrugere), Denmark

Linda Läänesaar
Director General, Eesti Tarbijakaitse Liit (ETL)

Lizzie Vann
Trustee, The Organix Foundation, UK

Magda Stoczkiewicz
Director, Friends of the Earth Europe

Mare Abner
Chairwoman, Estonian Disabled Women Society, Estonia

Monique Goyens
Director General, BEUC- The European Consumers Association

Patti Rundall, OBE
Policy Director, Baby Milk Action, UK

Pia Valota
Co-ordinator, ASECO Alliance of Social and Ecological Consumer Organisations
Also:
ACU Associazione Consumatori Utenti, Italy

Prof Erik Millstone
Science and Technology Policy Research, University of Sussex, UK

Richard Watts
Children's Food Campaign Director, UK

Sally Bunday MBE
Founder /Director, Hyperactive Children's Support Group (HACSG), UK

Steve Nash
Co Founder Member, Haemolytic Uraemic Syndrome Help (HUSH), The UK E.coli
Support Group, UK

Tiiu Määrsepp
Director, Tartu Consumer Advice and Information Centre, Estonia,
Also:
Board Member, Tartu Women Society, Estonia