



**SUBMISSION TO THE CHAIR OF FSANZ 10 MARCH 2009
REGARDING FOOD COLOURS**

Australian regulations on artificial colours are inconsistent with overseas use

TABLE 1 Artificial colours permitted in Australia

Code	Name	Banned or restricted in other countries
102*	Tartrazine	UK, EU, Norway
104*	Quinoline Yellow	UK, USA, Japan, EU
110*	Sunset Yellow	UK, EU
122*	Azorubine, Carmoisine	UK, EU, USA, Canada, Japan, Norway, Sweden
123	Amaranth	USA
124*	Ponceau, Brilliant Scarlet	UK, EU, USA, Norway, Finland
127	Erythrosine	Rarely used in the USA due to known hazards
129*	Allura Red	UK, EU
132	Indigotine	
133	Brilliant Blue	
142	Green S	USA, many other countries
143	Fast Green FCF	EU, some other countries
151	Brilliant Black	USA, Canada, Finland, Japan, Norway
155	Brown HT	USA, Austria, Belgium, Denmark, France, Germany, Norway, Sweden, Switzerland

* Southampton Six colours. Due to constant changes, there may be minor inaccuracies in this table.

- In the UK, the six artificial colours marked with an asterisk (the so called Southampton Six) are subject to a 'voluntary phase out' by the end of 2009. <http://www.foodnavigator.com/Legislation/Ministers-on-board-with-Southampton-six-phase-out>
- Most of the big manufacturers in the UK are extending the voluntary ban to all artificial colours, including Brilliant Blue 133 – e.g. there was big publicity when artificially coloured blue Smarties were withdrawn in the UK due to health concerns about E133 in 2006 and when naturally coloured blue Smarties were introduced in 2008.

- By the end of 2009 in the EU foods containing the Southampton Six colours will have to carry the warning: "may have an adverse effect on activity and attention in children." http://www.euoparl.europa.eu/news/expert/infopress_page/067-33565-189-07-28-911-20080707IPR33563-07-07-2008-2008-false/default_en.htm

Aussie kids most at risk from artificial colours 123 and 155 says FSANZ survey in December 2008. The two artificial colours most consumed by Australian kids are both banned in the United States. According to the Colour Survey released on 11th December 2008 by food regulator FSANZ, the artificial colours most consumed by children under 12 in Australia are Amaranth (colour 123) and Brown HT (colour 155). Amaranth was banned in the US in 1976 as a suspected carcinogen and Brown HT is also banned in the United States as well as Austria, Belgium, Denmark, France, Germany, Norway, Switzerland and Sweden. In third place was Sunset Yellow (110), one of the so-called Southampton Six artificial colours recently banned in the UK and subject of a warning label in the EU.

These colours are synthetic coal tar dyes and azo dyes that have been linked to behavioural and learning problems in children. The highest concentrations of artificial colours were found in savoury snack foods, ice cream/ice confectionery blocks/sticks, confectionery and cakes/muffins/pies. The highest dose of any food colour was a massive 7000 mg/kg of Brown HT in an instant chocolate pudding mix, an amount over 24 times the Australian maximum permitted level of 290 mg/kg and nearly 46 times the international maximum permitted level of 150 mg/kg. More at: <http://www.foodstandards.gov.au/srcfiles/Final%20Appendicies.pdf>.

Labelling of colours and preservatives in pharmaceuticals and foods such as medicated lollies

Artificial colours in medication, supplements, toothpaste, other dental products and cough lollies were not even considered in the most recent survey of colour intake by Australian children.

In the EU, various health warnings are required if the following additives are used in medication.

- **Colourings:** E102 (tartrazine); E110 (sunset yellow FCF); E122 (azorubine, carmoisine); E123 (amaranth); E124 (ponceau 4R red, cochineal red A) and E151 (brilliant black BN, black PN). Warning: May cause allergic reactions.
- **Preservatives:** E210 (benzoic acid); E211 (sodium benzoate) and E212 (potassium benzoate). Warning: Mildly irritant to the skin, eyes and mucous membranes
- **Preservatives:** E220 (sulphur dioxide); E221 (sodium sulphite); E222 (sodium bisulphite); E223 (Sodium metabisulphite); E224 (Potassium metabisulphite) and E228 (Potassium Bisulphite) Warning: May rarely cause severe hypersensitivity reactions and bronchospasm (difficulty in breathing). Ref: European Commission Volume 3B Guidelines: excipients in the label and package leaflet of medicinal products for human use July 2003 http://www.foodcomm.org.uk/PDF%20files/EU_guidelines.pdf

In Australia, under TGA rulings, artificial colours do not even have to be listed on medications and other pharmaceuticals including medicated lollies which are displayed on supermarket shelves alongside other confectionery.

One of our members was told by a giant manufacturer that if he wanted to know whether a particular product contained artificial colours he would need a letter from his doctor and they would supply the information to his doctor.

If colours are listed in these products or on the Consumer Medicine Information sheets they are frequently listed by alternate names not recognised by consumers for example, a consumer was told by a pharmacist at the company which a certain medication that the pink colour was “ferric oxide (Fe₂O₃) also known as Iron (III) oxide, Pigment red 101 or Diiron Trioxide; colour index (C.I.) 77491”. However the pharmacist failed to mention it is also called iron oxide or food colour (172) which she would have recognised. Her response showed she was unable to understand his answer: “Colour 101 isn't on the list of nasty [food] additives. Does that mean I can discount colour as a cause of problems?”

Under the United Nations guidelines for consumer protection, consumers have “the right to be informed - to be given facts needed to make an informed choice, and to be protected against dishonest or misleading advertising or labelling”. That should mean informed in ways they understand.

How many Australian products use artificial colours?

In the UK, despite food industry claims that artificial colours are used in just a 'handful' of products, the UK actiononadditives website was able to list over 1,000 products using the additives from the Southampton study, most of them targeted at children.

See the table below for what they found in other countries and for what we have found so far in Australia (still counting ...)

TABLE 2 How many products use the Southampton Six artificial colours in each country?

No of products	Country
1000+	UK
34	Sweden
199	Austria
344	Denmark
1000+ and still counting ...	Australia

EU: www.actiononadditives.com

Australia:

<http://www.fedupwithfoodadditives.info/features/colours/colourfoods.htm>

Our experience suggests that Japan is similar to Sweden.

In other words, Australia has at least as many products containing artificial colours as the UK, and has possibly the highest known number in the world at this time.

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The Kids First Campaign unites the three leading food additive consumer organizations in Australia, Additive Alert, the Food Intolerance Network and Additive Education, and is supported by over 100 influential health professionals, educators, food manufacturers and children support service providers. An online petition on the issue has already gathered over 15,000 signatures. 13 Mullion St Mullaloo WA 6027 • T (08) 9403 2245 • additivealert@bigpond.com • www.additivealert.com.au Additive Alert Pty Ltd ABN 24 168 207 206