

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

JOINT OFFICE: Via delle Terme di Caracalla 00100 ROME Tel.: 39 6 57051 Telex: 625825-625853 FAO I Email: codex@fao.org Facsimile: 39 06 5705.4593

Agenda Item 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

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DISCUSSION PAPER ON THE USE OF COLOURS IN FOODS

(Prepared by Denmark)

INTRODUCTION

1. The 30th session of the Codex Committee on Food Additives and Contaminants (CCFAC) accepted the offer made by Denmark to prepare a discussion paper on the use of colours in food for further consideration at its next meeting (ALINORM 99/12, para. 38).
2. In accordance with the criteria established in the Preamble of General Standard for Food Additives (GSFA), food additive provisions will be endorsed by the CCFAC only if they have been evaluated by JECFA and present no risk to the health of consumers at the proposed level of use, the use of the additive is technologically justified and the use of the additive does not mislead consumers. These criteria apply to all food additives regardless of additive functional class. Some Codex Member States regard colours as a special class of food additives. Therefore, CCFAC should consider whether colours require special principles for their use and whether the CCFAC should consider developing specific criteria for endorsing colour provisions in the draft GSFA.

TECHNOLOGICAL NEED FOR THE USE OF COLOURS

3. There are several justifications notified for the technological need for the use of colours in food. For example, some foods will lose colour during processing and/or storage and addition of colour can compensate for any loss of colour during processing. Food colours are also added to food because of consumer preference or cultural traditions for foods with a characteristic colour. In addition, colours are added to foods to provide variety and to enhance attractiveness or to impart a distinctive colour to some processed foods e.g., candies, soft drinks, cakes etc. In all cases, the amount of added colour is technologically limited to that which achieves the intended level of coloration.

SAFETY ASPECTS

4. National authorities and international science-based Expert committees (e.g., JECFA) evaluate the safety of colours. The information to support the safety of colours and other food additives is similar. However, the allergy aspects are not included in the safety evaluation of food additives, including colours, as no scientific method has been developed to identify this aspect.

5. In Denmark, scientific experts have examined the safety of colours with respect to intolerance reactions and have advised that rather than prohibiting the use of some colours in food, the presence of added colours should be declared on the food label. In this manner, consumers are enabled to make informed decisions about the foods that they purchase. However, Denmark decided to prohibit the use of colours in basic foods and require that all added colours must be declared on the food label. The food groups which were to be regarded as groups of basic foods were listed with reference to the food categorisation system used in the food additives legislation. Denmark took this action to ensure that persons with intolerance, hypersensitivity, or allergenicity to certain food colours have access to basic foods without added colour. Other countries have chosen to limit, more strictly, the addition of certain classes colours e.g., the azo-dyes, to foods.

MISLEADING CONSUMERS

6. The Preamble to the GSFA establishes that the use of food additives, including colours, should not mislead consumers as to the identity or quality of the food. This includes the use of food additives to enhance the appearance of food in such a way that the consumer is misled with respect to the quality of the food. In accordance with the Codex General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985, Rev 1-1991), the use of all food additives should be declared in the ingredient labelling statement to allow consumers access to information which enables them to make informed choices about the foods they purchase. This includes added colours.

SOME CONSUMER VIEWPOINTS FROM THE DANISH PUBLIC DEBATE CONCERNING THE USE OF COLOURS IN FOOD

7. In Denmark, some consumers question the need for food additives in general and added colour in particular. Several arguments have been brought forward and some of them will be mentioned below.

8. Some consumers are concerned that added colours are unnecessary and are only used to mislead consumers. Others contend that full disclosure of added colours in the ingredient labelling statement is not enough to prevent misleading uses of added colour because it requires consumers to have the knowledge and time to distinguish between foods with and without added colour. Other consumers contend that because they do not accept any justification for the technological need for the use of colours, then colours should not be included in the GSFA.

9. An additional concern regards colours added to animal feeds with the intention of achieving a colouring effect in foods for human consumption (e.g., the addition of colour to poultry feed to colour egg yolks, the addition of colour to fish feed to colour salmon flesh). Such animal feed practices can result in the presence of colours in foods that may not contain a label declaring the presence of added colours.

10. Some colours have been associated with reports of allergic reactions (e.g., tartrazine). In the debate on whether these reactions could be avoided, some consumers are of the opinion that because colours are intentionally added to food, they can also be easily excluded from food if national

authorities would not approve them. Other consumers contend that national authorities should prohibit the use of colours in basic foods. The interpretation of what basic foods are can differ from country to country. For example, basic foods could be regarded as those foods that consumers should eat in accordance with national nutritional recommendations. Others could argue that because some individuals consume considerable amounts of foods that are not included among those recommended by national authorities, these of colours should also be prohibited in foods that contribute significantly to the diet.

11. Among the colours, azo-dyes have been identified as a group of special concern because of the potential for carcinogenic constituents. Azo-dyes have special limited uses in some countries and special attention should be given to CCFAC's discussion of these colours.

12. Consumers also claim that food-labelling requirements do not cover the catering food sector; consequentially, colours used in this sector cannot be identified. This could cause problems for consumers both in relation to intolerance and to being misled. These problems would be limited if colours were approved for a special limited number of food groups.

13. Although there is no scientific basis, some consumers differentiate between natural and synthetic colours and they are often of the opinion that natural colours are less harmful than synthetic colours, even though all colours and other food additives are evaluated by the same procedures.

PROPOSED OPTIONS FOR CONSIDERATION

14. The CCFAC should consider the proposals for decision listed as options below. Options A-F below for the use of colours and the need for the development of special policies in this area of food additives.

- Option A: CCFAC could develop a list of basic foods in which added colours will not be endorsed by CCFAC. The foods which should be regarded as basic foods should be listed with reference to the Food Categorisation System.
- Option B: CCFAC could adopt a policy that the use of colours in basic food and other foods that are consumed in large amounts should not be endorsed.
- Option C: like Option A, but only for azo-dyes
- Option D: CCFAC could continue to apply the same criteria for endorsing maximum use levels for colours as for other food additives.
- Option E: CCFAC could amend the Preamble to the GSFA to establish additional criteria for the use of colours to ensure that consumers are not misled by the presence of added colours.
- Option F: CCFAC could request the Codex Committee on Food Labelling to examine the labelling criteria for added colours to ensure that they are sufficient to ensure that persons with intolerance, hypersensitivity or allergenic responses to added colours are adequately protected them from unsafe exposure to added colours.