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Dear FSA Board Member

As you know, the FSA funded an important study on the effects of some additives on children's behaviour.¹ Having discussed the issue with your officers, we are aware of some of the reasons why advice is being sought from the European Food Safety Authority. We agree that to seek EFSA's views is both right and proper. However, we are concerned about the dangers of 'pushing the issue upstairs', especially the reputational risks to the FSA. As long-standing observers of these complex issues, we are writing to you as a Board member to urge you to consider very carefully the Board's responsibilities to UK consumers here and now. We believe that there is ample scope for the Board to act more firmly than is currently apparent.

We believe a number of reasonable and proportionate actions are available to the FSA Board, which you and your fellow Board members could consider when the Board meets this Thursday to discuss this issue. We urge the FSA to be more pro-active than has so far been the case. There are a number of reasonable and specific actions you could consider.

¹ Donna McCann, Angelina Barrett, Alison Cooper, Debbie Crumpler, Lindy Dalen, Kate Grimshaw, Elizabeth Kitchin, Kris Lok, Lucy Porteous, Emily Prince, Edmund Sonuga-Barke, John O. Warner, and Jim Stevenson, 'Food additives and hyperactive behaviour in 3-year-old and 8/9-year-old children in the community: a randomised, double-blinded, placebo-controlled trial', *The Lancet*, Sept 6 published on-line.

You could:

- Widen the scope of the FSA's advice concerning synthetic food colourings and children's behaviour from hyperactive children to all children, because the University of Southampton study reported significant adverse effects in a representative sample of ordinary children.
- Invest FSA research funds into similar studies to examine possible adverse effects on children's behaviour, especially from other synthetic colours and other commonly used additives and mixtures.
- Send FSA delegations to the EFSA and to DG-SANCO to argue for the imposition of restrictions in the use of synthetic colours, especially in foods and drinks marketed for babies, children and adolescents.
- Ask the Department of Health and the Committee on the Safety of Medicines to review the use of mixtures of food additives including synthetic colours in prescription and over-the-counter medicinal products.
- Review the FSA's understanding of the Precautionary Principle and how it is to be implemented by scientific committees and risk managers/policy makers.
- Initiate a review of food additives labelling for products sold in catering outlets, both eat-in and take-away.
- Invite the School Foods Trust to review its guidelines concerning food additives and synthetic colours in food and drink products sold in schools and served in school meals.
- Initiate a project to make explicit the benchmarks that evidence would need to reach as a basis for permitting, restricting or banning food additives.
- Review the extent to which FSA guidance to expert advisory committees, as embodied in the report of the Review of Scientific Committees (April 2002), is being implemented, especially in regard to the need to acknowledge all uncertainties and any assumptions that influence the interpretation of scientific evidence.

Our view is that at this week's Board Meeting, were you to propose such actions, the FSA would both be in line with the findings of the University of Southampton and other studies and, just as importantly, be acting more responsibly and responsively to the findings and implications of that study. We are sure that you are aware that many responsible, large companies are already withdrawing not just the additives implicated in the Southampton study but many other cosmetic ones.² For the FSA not to act more firmly and pro the consumer would be to risk the FSA's reputation quite unnecessarily. Being trusted to act *pro bono publico*, as you know, was one of the FSA's founding objectives.

² E.g. C. Williams, 'Additives: colourful headlines, dull truths', *The Grocer*, 15 September 2007. pg 26

We urge you to act more firmly now for UK consumers.

Yours sincerely,

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