



PROPOSED REVISION OF CONDITIONS OF USE OF ALUMINIUM BASED FOOD ADDITIVES: BEUC COMMENTS

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BEUC and its members welcome the Commission proposal to restrict the use of aluminium in food additives. This is particularly important given the probable risk that a significant proportion of the population exceeds its Tolerable Weekly Intake of 1mg/kg body weight/week (EFSA, 2008). It is therefore imperative that the proposed restrictions for the use of aluminium based food additives and, more broadly, annexes II and III of Regulation 1333/2008 come into force without further delay.

As aluminium is also permitted in food colouring additives, we wish to take this opportunity to emphasize our position on food colours. BEUC and its member organisations share the opinion that food colours should be prohibited from use in basic food groups such as meat preparations, fish products, jam, etc. as there is no clear technological need for them. In fact, the use of such colours can mislead consumers as to the presence/absence of ingredients or to mask colour changes (eg. in meat) in food products. It is our view that colours should only be permitted for use in foods when there is a real technological need for them and if no alternative is possible.

The safe use of colours in food must be guaranteed. This is vital for all sectors of the population but especially for more vulnerable groups (children, pregnant women etc.). Taking into consideration EFSA's first opinions on colours, it is clear that the permitted levels of some colours must be reduced and their use restricted to a smaller number of food categories, or, in some cases, be prohibited.

The current use of additives in food products creates a real risk that the ADI for food colours and the TWI for aluminium can be exceeded. For aluminium specifically, other sources of exposure include drugs containing aluminium salts, migration from films and pots and pans made from the metal. Therefore, the presence of aluminium in meat products, jam, fish roe and products where colours are also used to replace expensive ingredients such as fruit (resulting from the carry over of aluminium lakes) is unacceptable.

Furthermore, BEUC is concerned about the inclusion of terms such as "burger meat" and "breakfast sausage" into the European Regulation on additives. These products may be presented as "local products" or "specialities", but recent research from our members has shown that in some countries (Spain and Portugal) the use of sulphites has become the general rule rather than the exception (see examples of labels in the annex below) with no evidence that authorities or the meat sector are trying to decrease their use. This is contrary to the case in Belgium where authorities and butchers federations have campaigned for the use of sulphites in minced meat and their products to be banned and in Italy where it is not common to add sulphites to minced meat. We would like some clarification as to why such "local products" continue to exist in the European legislation on additives. The current situation is unacceptable as it affects both consumers health (unnecessary contribution to the ADI, and it's an allergen) and the free market economy (as long as the name as specified in the legislation is used, it's permitted, which is dangerous because of possible entrance into European countries that have banned the use of sulphites in meat for many years).

BEUC calls for the abolition of exemptions for burger meat and breakfast sausages from the Regulation as there is no technological need for such additives in these products (as is demonstrated in the cases of Belgium and Italy above) and, in fact, their use only misleads consumers. Such additives are used to increase the shelf life of products and give them the appearance of freshness thereby disguising the fact that they may have been on display for a number of days. Their use in frozen products is also misleading and we call on the Commission to propose a ban on the use of sulphites in all meat products.

Finally BEUC would like to repeat its support for the Commission's revision of the use of Southampton colours. While we regret that it has not been dealt with more rapidly so as to be included in the original annex to the Regulation, BEUC and its members welcome the Commission work in this area. Such a thorough revision regarding the exceeding of the ADI, the technological need for and the verification of the actual use in foods ought to be performed, in our opinion, for all colours and additives. It is also our belief that the food industry should be open and transparent when explaining the reasons behind the reformulation of products to remove such colours to consumers. The argument that consumers do not accept such products does not hold up in our view, given the fact that they have been banned in Sweden for a number of years without any consumer complaints. BEUC also contests the industry argument that there are no alternatives to the use of Southampton colours in foods given that research conducted by our members has found it increasingly difficult to find such colours in pre-packed food (especially those foods which should bear the warning label). This clearly shows that the food industry is finding alternative colours to use in their food products. We therefore call for the Commission to maintain a strict line when proposing permitted levels of these colours in foods.

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