



Food Intolerance Network

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Proposal P298 Benzoate and Sulphite Permissions in Food

The Food Intolerance Network wishes to make a submission on the above Proposal. We are an organisation with over 3,000 members and an active consumer advocacy website that has recorded over 500,000 hits, so we can fairly claim to represent a large constituency who know they are affected by food additives.

There are two key issues which we wish to raise.

First, we are critical of the 21st Australian Total Diet Study (21st ATDS) since its findings are based on food consumption in 1995 (!), before the explosion of dried-fruit based snacks for kids. Therefore, despite the calming conclusions about “very conservative” and “overestimation” and “margin of safety”, the results **seriously underestimate actual consumption** in our view. For instance, the Food Intolerance Network has reliable reports of preschoolers who were consuming twenty times the ADI for sulphites, and suffering the health consequences in asthma or cough-variant asthma.

Consider a child weighing 20kg who eats 100g of dried apricots (just half a packet) containing the maximum permitted sulphite level of 3000ppm (as some do, see <http://health.act.gov.au> food survey report 1996-97). Their intake will be 15mg per day, 21 times the highest group ADI set by JECFA. Any teacher or mother can tell you that these levels of consumption are entirely realistic.

Second, the 21st ATDS still manages to conclude that “there is currently no clinical evidence that high dietary exposure to sulphites and benzoates can cause adverse effects in humans”. We are frankly amazed that FSANZ can claim such a thing and attach the scientific evidence which absolutely refutes that conclusion (Attachment A).

See also references and abstracts under Benzoates and Sulphites at <http://www.fedupwithfoodadditives.info/information/references.htm>

There are also many observations, the very basis of science, of the adverse effects of sulphites and benzoates. See

<http://www.fedupwithfoodadditives.info/stories/storyasthma1.htm>

And you will doubtless have seen Jamie Oliver at Wingate Primary School in the UK being amazed that the school has not needed an asthma pump since he changed their diet - "you just change their food and then you don't have to be ramming all those chemicals and drugs down them."

As you may know, we remain very critical of the fact that FSANZ does not test any additives for their effects on children's learning and behaviour before approval, nor does it accept reports of such after approval. Given that 25% of presentations at Royal Children's Hospital outpatients in 2004 were for learning and behaviour problems, FSANZ's continuing approach to approval criteria looks very narrow and out-of-step with contemporary evidence. Looking for "gastric lesions" may be easy observation, but we believe it is poor science and does not adequately reflect either the public interest or real health risks.

The experience of our Network is that present levels of these substances in our food supply present a daily public health and safety risk, so we would certainly support the immediate commissioning of a full risk assessment for benzoates and sulphites. We suggest the following changes to the Food Standards Code:

1. **A reduction in the maximum permitted sulphite level in dried fruits from the current level of 3000 mg/kg**, which is 50% higher than most countries. Candied fruit is also a concern. There is also a surveillance and monitoring issue, as much dried fruit eaten in Australia and New Zealand is imported from countries with less than trustworthy food standards.
2. **Removal of all sulphites from meat.** The USA achieved this in 1959 following public health concerns, particularly the reduction in the vitamin thiamine in sulphited products, so it is a reasonable action to take in terms of public health. Concerning sulphites, we brought to FSANZ attention the scandalous illegal use of sulphites in mince meat (<http://www.fedupwithfoodadditives.info/support/FSsulphite2.pdf>) where an independent survey by members found 43% of mince contained sulphites. Detection of sulphites were more likely to be reported than were absence of sulphites, so this cannot be considered a representative survey, but given that mince is meant to contain **zero** sulphites there is clearly an enforcement issue.
3. **Label declaration of all added sulphites**, whether greater than 10ppm or not. Many of our members are gluten-free, exposing them to a range of substitutes which currently contain sulphite residues from processing, such as maize, potato and tapioca starches. Sulphite is rarely declared on the labels of such products yet many of our

members react with asthma and/or eczema. Fruit and vegetable products derived from bulk materials for manufacturing purposes also often contain sulphite carried over, which is not declared but which causes reactions in sensitive individuals.

4. In more general terms, we believe that health organisations and medical experts should work with the food industry to reduce the use of all asthmagenic additives, especially sulphites, in the foods that children eat.

Finally, in preparing this submission we consulted with our members, most of whom will avoid these additives as a matter of course and so are unlikely to be able to report current problems. There was of course strong support for us making a submission, but I'll let two of them have the last word to show you the human face of FSANZ decisions:

"I have one child whom I am doing this diet for however when it came to testing benzoates (in lemonade) the whole family participated. I was very surprised by the results. The 4 of us reacted very differently to the test, however we all DID react. I was very short tempered and impatient, my 16 year old become tearful and kept breaking down in the middle of the shopping centre, 14 year old with ADHD and ODD become extremely annoying and kept making noises and totally disobedient. My 6 Y/o become confused and totally deaf (or ignorant). As I said I was extremely surprised by all our reactions and when asked if they would like to do the test again they all say no. All these reacts occurred after having only 2 glasses each of lemonade." – mother by email 7/9/05.

"I react very badly to all sulphites - in concentrations of less than 10mg/L. I feel that they should have to list if the product has sulphites at all..... and if they are not happy with that (as it is in many many other additives like beverage whitener) then the limit should be dropped to 2mg/L detectable sulphites to be listed on the label. It would definitely reduce how many times a year I am affected by sulphites - even though I am extremely cautious in avoiding them (to the point that I try to prepare all my own food and rarely try new products), I still have serious reactions around 3 to 4 times a year (enough to miss two to three days of work at a go)." - mother by email 5/9/05.

Yours faithfully

Dr Howard Dengate FAICD