



February 2010

**Submission from the Dietitians Association of Australia
to Food Standards Australia New Zealand**

A603 - Erythrosine in food colouring preparations

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 4000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for better food, better health, and better living for all.

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DAA is pleased to provide further comment on Application A603 which is now at Draft Assessment stage.

DAA notes that FSANZ has undertaken dietary modelling based on the proposed extension of the permissions for using erythrosine in foods (ie in icing and frostings) and has determined that for all population groups dietary exposures are below 50% of the ADI including when protective assumptions are made.

DAA also notes that FSANZ has consulted with Dr Robert Loblay and that he confirmed there are few clinical studies on potential for acute intolerance reactions. We are informed by a DAA member that the anecdotal experience of the Royal Prince Alfred Hospital Allergy Clinic was that erythrosine produces much stronger reactions in those people who are sensitive to food colours when compared to tartrazine. DAA believes it is worth considering that one of the problems with food chemical reactions is that evidence of adverse effects often only becomes available after usage permissions have been given (or increased). Because erythrosine usage has been so restricted in Australia for many years, it is understandable that the number of patients presenting with adverse reactions to this chemical is small.

DAA also asks FSANZ to consider that if this application is approved, small bakeries will be using the colour in foods that will be sold without labeling, so consumers will not be alerted to the presence of this colour.

The technical purpose of the proposed extension of the use of erythrosine is to improve the visual appearance of cakes and other baked goods by providing a particular shade of colour in the icing which is unattainable using other food colours. DAA believes that in an environment where there is consumer and health professional concern over individual reactions to this and other colours, the stated technical purpose does not warrant an extension to usage permissions for this colour.

DAA does not support the application and recommends that the regulatory status remain conservative (ie restricted to preserved cherries only) as in the EU and Codex.