March 23, 2010

Letter to Members of Congress

The undersigned organizations are concerned that the federal government is doing nothing to protect children from food dyes, which can impair children’s behavior. We encourage you to (a) support legislation that would ban the use of dyes in school foods, (b) fund a study by the Institute of Medicine on the broader issue of diet and behavior, (c) press the FDA to respond to a citizens petition calling for a ban on most dyes.

Numerous controlled studies conducted over the last three decades have demonstrated that synthetic dyes (usually tested as mixtures of several dyes) impair some children’s behavior. In 2004, a meta-analysis of studies on dyes and behavior concluded that the effect of dyes on children was statistically significant, particularly with regard to parents’ ratings.1

Subsequent to the meta-analysis, two large studies funded by the British government found that mixtures of dyes (administered together with the preservative sodium benzoate) adversely affected children’s behavior.2 Unlike most previous studies, the two new studies tested children in the general population, not ones whose parents suspected they were sensitive to dyes. As a result, the British government urged food manufacturers to stop using the tested colors, which companies apparently have done. Furthermore, the European Union is requiring companies to put a warning label on most dyed foods beginning in July 2010. The notice will state that consumption of the food dye(s) “may have an adverse effect on activity and attention in children.”

In contrast, the U.S. Food and Drug Administration (FDA) has done nothing to protect children from food dyes’ effects on behavior. In fact, the FDA’s Web site has a pamphlet written by the food industry’s International Food Information Council that states “Although this theory was popularized in the 1970’s, well-controlled studies conducted since then have produced no evidence that food color additives cause hyperactivity or learning disabilities in children.”3

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3 http://www.fda.gov/Food/FoodIngredientsPackaging/ucm094211.htm#qahyper
Americans’ exposure to synthetic dyes has risen sharply. According to the FDA, the amount of food dye certified for use was 12 milligrams per capita per day in 1955. In 2009, 61 mg per capita per day, or more than five times as much, was certified for use. Dyes are used in countless foods and are sometimes used to simulate the color of fruits or vegetables. Artificial dyes are particularly prevalent in the sugary cereals, candies, sodas, and snack foods pitched to kids.

While the FDA denies that synthetic dyes affect children, the National Institute of Mental Health recognizes in its article on “What causes ADHD?” a “link between consumption of certain food additives like artificial colors or preservatives, and an increase in activity.”\(^4\) The American Academy of Family Physicians states on its Web site: “Studies have shown that certain food colorings and preservatives may cause or worsen hyperactive behavior in some children. Talk to your doctor about whether you need to make any changes to your child’s diet.”\(^5\)

In June 2008, the Center for Science in the Public Interest formally petitioned the FDA to ban most of the currently approved dyes (Blue 1, Blue 2, Green 3, Orange B, Red 3, Red 40, Yellow 5, and Yellow 6). Because a ban would take several years to implement, the petition requested an immediate requirement that foods with synthetic dyes bear a warning notice.

Given the preponderance of evidence showing a link between food dyes and hyperactivity, the authoritative actions taken by the British government and European Parliament, and the lack of any health benefit of dyes, we urge you to undertake several actions to protect children:

- Introduce legislation banning foods containing synthetic dyes from all schools. Such a ban should apply to foods sold in cafeterias, vending machines, and stores on school campuses.

- Fund the Institute of Medicine to evaluate the studies on diet (not just dyes) and behavior.

- Press the FDA to expedite its review of CSPI’s petition that calls on the agency to ban most dyes.

Thank you for your interest in this matter. We would be pleased to help you however we can.

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\(^4\) http://www.nimh.nih.gov/health/publications/attention-deficit-hyperactivity-disorder/complete-index.shtml#pub3

\(^5\) http://familydoctor.org/online/famdocen/home/children/parents/behavior/118.html#ArticleParsysMiddleColumn0007
Sincerely,

Center for Science in the Public Interest*
Consumer Federation of America
Feingold Association of the United States
Institute for Agriculture and Trade Policy
MomsRising
National Consumers League
Physicians for Social Responsibility
Prevention Institute
Science and Environmental Health Network

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