

Dame Deirdre Hutton,
Chair of Food Standards Agency
Aviation House, 125 Kingsway,
London WC2B 6NH

13th September 2007

Dear Dame Deirdre,

Food Additives & Hyperactive Behaviour in children - University of Southampton Research

I am writing on behalf of the Organic Trade Group (OTG), established this year to represent the specific needs and views of organic businesses in the UK. We have been set up in conjunction with the Soil Association who have to date been the major voice of the organic sector within the UK.

Jointly, we are disappointed that the FSA did not feel that the organic sector of the food industry was worthy of being consulted on the above research before its response was published. Organic is a popular and growing industry with retail sales of over £2bn*. More than half of all shoppers now buy organic foods. Parents, in particular, are choosing organic foods to feed their children**.

Organic food, as defined by the EU and Soil Association Standards, has always prohibited the use of all the additives that were identified in the report as having a 'significantly adverse effect' on children, and also of many other additives in foods. Eating Organic foods ensures that children do not consume these additives as part of their diets.

As I am sure you will agree, we have a critical role to play when considering regulatory response to such important research. We would welcome the opportunity to meet with you at the earliest opportunity to discuss your response.

It is our firm belief that the FSA's recommendation that the decision of whether or not to expose children to these additives should be left entirely up to the parents is flawed because:

1. It is incorrect to assume that only some children will be adversely affected by the five azo dyes and preservative sodium benzoate. As Professor Stephenson says in his research, children's health varies along a wide spectrum and neither the researchers nor the FSA is able to say at which point along that line (and therefore what percentage of the population) will be affected by the chemicals.

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2. The consequence of this is that all children should be protected from the chemicals described in the executive summary of the research as having 'a significantly adverse effect' on the children in the study.
3. We find it unacceptable that the FSA has not made clear the full information that would help parents make a more informed decision, or taken a more precautionary approach. By leaving the decision to parents, many children will remain unprotected from the effect of these chemicals because:
 - a. Their parents may not be aware of the research or government advice, or indeed may not have a choice of foods on sale other than those containing these additives
 - b. The labeling of particular foods may be hard to read or understand (for example, in the case of many items of confectionary or foods sold with multiple-ingredients or multiple-language packaging).
 - c. The foods containing additives may be cheaper than those that do not, providing a disincentive for those on a budget.
4. Not addressing these issues via regulation would appear to allow the conventional food industry to continue to deceive the public about their foods by using dyes to imply, for example, a greater quantity of fruit. This appears to over-ride the need to protect children from these hazardous chemicals.

We will continue to raise our concerns about the adulteration of all foods, and particularly those for children, with the public.

I look forward to your response and ask for a commitment to consult with the organic industry via the OTG in the future. A list of the committee members of that group is attached.

Yours sincerely,

Dr Elizabeth Vann MBE

Chair, the Organic Trade Group

* The Soil Association 2007 Organic Market report states:

Retail sales rose last year by £350million to £2bn. Retail sales have grown by more than 27%/a for the last ten years.

Mintel, the market research agency, confirms that half of all shoppers now buying some organic goods.

** Soil Association survey published 1st September 2007.

Trade Committee Members of the Organic Trade Group

Elizabeth Vann	Organix Brands Ltd
Adam Wakeley	Organic Farm Foods
Ella Heeks	Abel & Cole
Russell Smart	Rasanco
Carol Welch	Green & Black's
Karl Tucker	Yeo Valley Organic
William Lana	Greenfibres
Nigel Sharp	Waitrose
Patrick O'Flaherty	RDA Organic
Abi Weeds	Essential Care Organic
Chantelle Ludski	Fresh! Naturally Organic
Manny Sawhney	Asperion Hotels Group