



February 19, 2019

Submitted via <https://oehha.ca.gov/comments>

Office of Environmental Health Hazard Assessment  
1515 Clay Street, 16<sup>th</sup> floor  
Oakland, CA 94612  
Attention: Anna Smith, Food Dye Study

**Re: Request for Information on the Neurologic and Neurobehavioral Impacts of Synthetic Food Dyes**

SNAC International is pleased to submit comments on the Office of Environmental Health Hazard Assessment's (OEHHA's) request for information related to synthetic food dyes. We understand at the request of the California Legislature, OEHHA is conducting a risk assessment of the potential impacts of synthetic food dyes on children, particularly for neurobehavioral and other neurologic effects. We appreciate the opportunity to submit comments, as well as OEHHA's extension of the comment period.

Founded in 1937, SNAC International is the international trade association of the snack food industry representing snack manufacturers and suppliers. SNAC International represents over 400 companies worldwide including but not limited to, manufacturers of potato chips, tortilla chips, cereal snacks, pretzels, popcorn, kettle corn, cheese snacks, snack crackers, meat snacks, pork rinds, snack nuts, party mix, corn snacks, pellet snacks, fruit snacks, snack bars, granola, snack cakes, cookies, and various other snacks.

We write to call OEHHA's attention to the Food and Drug Administration's (FDA's) prior review of this very issue. In particular, FDA's Food Advisory Committee held a meeting on March 30-31, 2011 to evaluate the possible association between certified (synthetic) color additives and children's behavior.<sup>1</sup> The Committee concluded that available evidence does not establish a causal relationship between the consumption of artificial color additives and hyperactivity in children. The Committee voted against advising FDA to require additional labeling, such as a warning label, on foods containing artificial colors.

In its advisory to consumers, FDA issued the following statement summarizing the results of the meeting.

The FDA has reviewed and will continue to examine the effects of color additives on children's behavior. The totality of scientific evidence indicates that most children have no adverse effects when consuming foods containing color additives, but some evidence suggests that certain children may be sensitive to them. The FDA will continue to evaluate emerging science to ensure

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<sup>1</sup> *Background Document for the Food Advisory Committee: Certified Color Additives in Food and Possible Association with Attention Deficit Hyperactivity Disorder in Children* (March 30-31, 2011), FDA Docket No. 2008-P-0349.

the safety of color additives approved for use. **Parents who wish to limit the amount of color additives in their children’s diet may check the food ingredient list on labels. Parents should also discuss any concerns with their family physician.**<sup>2</sup>

FDA also explained:

Color additives are safe when they are used in accordance with FDA regulations. **If you choose to limit your intake of color additives or to avoid them altogether, you can identify whether they are in a product by reading the ingredients on the nutrition label.**

Finally, the FDA advisory to consumers makes clear that the agency continually monitors the safety of color additives and has legal authority to take enforcement action when warranted:

The FDA continually monitors reports of problems that may be related to color additives and takes action when necessary. The FDA can issue a warning letter to the manufacturer, detain products before they are shipped to stores, issue import alerts, or even seize products that are found to be unsafe or to contain color additives that are prohibited, misused, or not properly identified as ingredients. The FDA may also revoke or amend its regulations of current authorized uses as needed.

SNAC International asks OEHHA to take into account the conclusions of the FDA Food Advisory Committee, as well as FDA’s recommendation that those who seek to avoid synthetic or certified food colors review ingredient statements, where these ingredients are identified.

We appreciate the opportunity to submit comments. Please do not hesitate to contact me if we can provide additional information as OEHHA conducts its risk assessment.

Sincerely,



Elizabeth H. Avery  
President & CEO  
SNAC International

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<sup>2</sup> Color Additives Questions and Answers for Consumers (last updated Jan. 4, 2018), <https://www.fda.gov/Food/IngredientsPackagingLabeling/FoodAdditivesIngredients/ucm488219.htm> (emphasis added).