The Hyperactive Children's Support Group press release
Tuesday 21st May 2007
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The Hyperactive Children's Support Group (HACSG) Survey of Food Additive Policies of the UK’s Major Supermarkets and High Street Food Retailers in 2007

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Background

The Hyperactive Children's Support Group (HACSG) has been calling for removal of many legally authorised food additives since its founding 30 years ago, in 1977, because of reports by hundreds of member parents of a link with behavioural problems.

Public awareness and scientific concerns about food additives

During the last 50 years the number and usage of food additives has risen very significantly. HACSG has noted increasing public awareness and concern in the subject of food additives. The most recent survey of attitudes to food by the Food Standards Agency (FSA), showed food additives to be of increasing concern to consumers and the main ingredient they looked for on food labels. There is also concern about the long-term safety of food additives, and about synergistic, ‘cocktail’ effects effects of multiple additives, over long periods, on health and behaviour.

Recent developments: research studies, food industry initiatives, The National Institute for Health and Clinical Excellence (NICE)

In recent months significant developments in this area have been appearing at an accelerating rate.

2006 was the year when the nation’s schools had to implement stringent new school meals policies, with resulting improved concentration and behaviour widely reported.

In March 2006, The Journal of Toxicological Sciences published research suggesting that combinations of food additives can be neurotoxic. Professor C Vyvyan Howard who oversaw the study says it is ‘biologically plausible’ that artificial additives affect behaviour.

Also in 2006, Sustain’s substantial report, Changing Diets, Changing Minds: How Food Affects Mental Health and Behaviour, described adverse effects of additives on behaviour, as did a report by the Mental Health Foundation.
In April 2007, Nestle removed all artificial colours from Smarties. In March 2007, The Food Commission reported that medicines for babies and young children frequently contain additives banned from foods and drinks designed to be consumed by the under threes.

Also in March 2007, the Hyperactive Children’s Support Group asked 11 major UK food retailers to respond to their survey on their food additive policies.

In early May 2007 it was suggested that a long-awaited Food Standards Agency funded study, on the effects of combinations of additives on children’s behaviour has vindicated one of the core the assertions made for the last 30 years by HAGSG: namely that certain additives can cause behavioural changes in children.

The European Food Safety Authority is currently re-evaluating its authorised food colours, to be completed in 2008, and it is currently calling for data on the safety of these colours. This is the first part of re-evaluation of all EFSA-authorised food additives.

During the last months there has been noticeable activity amongst food retailers announcing new food additive policy initiatives.

In June this year Whole Foods is due to open what will be the largest food retailer in London. If the store has the same policy advertised for US branches, it will be selling foods free of artificial sweeteners, preservatives, flavours and colours.

During this whole period NICE has been developing a new Guideline for ADHD clinical management and treatment, to be published in 2008. It reviews the evidence for different therapies, and will review dietary measures in the Autumn.

**The evidence has in fact been available for many years**

HACSG welcomes such developments warmly, yet points out that evidence has been available for a considerable number of years pointing to the link between food additives and problems with behaviour. The following are examples of the very many studies carried out all over the world.

In 1987, HACSG, together with Professor Neil Ward, Department of Chemistry, University of Surrey, and Scientific Advisor to HACSG, conducted an analysis of parental questionnaires about 357 ADHD-diagnosed children, and found that 89% reacted to artificial colourings, 71% reacted to preservatives and artificial flavourings, and over 50% reacted to flavour enhancers.
Professor Neil Ward’s 1990 research in the Journal of Nutritional Medicine, found that there is a link between the azo dye, tartrazine, and a lowering of body levels of zinc, which is an important nutrient for ADHD children.

In 1993, the Archives of Disease in Childhood also reported a very high percentage of children reacting to additives.

An FSA-funded trial in the Isle of Wight, completed in 1999 but not published until 2004, showed behavioural changes in children after food colouring challenges, in the control group as well as the ADHD group.

Groups such as Sustain, The Food Commission, The Soil Association, FAB research, Natural Justice, Food for the Brain, Foods Matter, have all concurred for many years that many food additives are wholly unsuitable to be included in children’s food.

**UK food retailers’ current food additive policies**

The HACSG felt it would be helpful to establish a picture of the current position of the main food retailers regarding food additives, to help parents with shopping, and was pleased to receive a response to its questionnaire from 10 of the 11 food retailers it approached.

These retailers were:

- Aldi
- Asda
- Co-Op
- Iceland
- Lidl
- Marks and Spencer
- Morrisons
- Sainsbury’s
- Somerfield
- Tesco
- Waitrose

We did not receive a response from Asda, but we are including its recently announced policy changes in the report.

The results were overall extremely positive, indicating that food retailers are clearly making a huge effort to respond to consumer demand, which HACSG welcomes warmly.
**General Food additive policies**

All the food retailers conform to relevant EFSA regulations for authorised additives, and therefore all additives referred to in this report are legally for use in food.

All the food retailers have a policy of some sort, with varying levels of detail and stringency.

**Own brand** – the supermarkets generally speaking apply detailed policies only to their ‘own brand’ products. Marks and Spencer of course only sells its own brand, and so it policies apply to all foods sold. *Unless otherwise stated, all detailed policies mentioned in this report refer to retailers’ own brand products.*

Iceland introduced sweeping additive reductions in 1998. The Co-Op have introduced low additive ‘Simply’ and ‘Healthy Living’ ranges. Waitrose aims to produce foods of the sort of ‘quality and functionality’ that its customer expect. It has an Ingredients and Technical Policy, with a list of 25 completely prohibited additives, and 17 restricted additives, mostly colours, for use in occasional foods such as birthday cakes. Lidl say they are committed to reducing the use of artificial additives in their own-label products. All artificial additives ‘have already been removed from a selection of products in our range and we are currently working on the rest of our products’. Aldi does not currently share its additive guidelines with customers. Marks and Spencer started their additive reduction programme early. They aim to minimise use of additives and refuse to use over half those permitted by the EU, particularly those with concerns about food intolerance and children’s diets. They also have additive policies for specific ranges: Their ‘Cook!’ range is completely additive free. Their Children’s Eat Well contains ‘no artificial colours, flavours, sweeteners, salt substitutes or preservatives’, and products with the Eat Well sunflower (healthier option) contain no artificial colours, flavourings or sweeteners. Morrisons keeps additives to a ‘minimum’, avoiding them where ‘non-functional’. Morrisons’ ‘Best’ range ‘excludes additives wherever possible’. Its ‘Eat Smart’ range avoids artificial colours and flavours. Morrisons plan to introduce a new range this year called ‘Natural Choice’, which will not contain any artificial flavourings, colours, sweeteners, flavour enhancers, preservatives or trans fats. Sainsbury’s sub-brands, ‘Taste the Difference’, ‘Kids’, ‘Be Good to Yourself’, ‘Basics’, and ‘Free From’ ranges have tighter additive restrictions than their standard or ‘core’ brand additive policy. Sainsbury’s ‘Supernatural’ range is additive free.

Tesco’s general policy avoids a list of certain named food additives, ‘unless it is impractical to do so’. 
Colours

The Co-Op has had an additive policy since 1985, the most recent changes in 2005 increased the number of banned colours from 10 to 22. Sainsbury’s say they permit ‘natural colours only’, but add that where this ‘is not possible’ it is clearly indicated on the pack.

Sainsbury’s removed azo and coal tar dyes certain colours from most products and where this was not possible their presence is clearly indicated on the pack.

Tesco has a list of ‘restricted’ colours, avoided unless ‘impractical to do so’.

Asda will have removed all artificial colours from its foods by the end of the year. Iceland banned all artificial colours in 1998.

Somerfield has a list of prohibited colours.

Waitrose has list of colours that are restricted and that are prohibited in its products.

By Sept 2007 Marks and Spencer will have removed artificial colours from 95% of its foods will be free from artificial colours with a further 4% completed by the end of the year. M&S has historically banned tartrazine.

Flavourings (artificial and nature-identical)

The HACSG is particularly concerned about flavourings, of which there are thousands authorised, but which do not have to be labelled separately. This makes life difficult for parents trying to spot individual reactions.

The HACSG cannot comment at this point on any reported behavioural or health effects of nature-identical flavours.

Iceland banned the use of all artificial and nature-identical flavours in 1998. Sainsbury’s prefer natural flavours to artificial ones when possible and use natural flavours only in their sub-brands mentioned above. Asda will have removed all artificial flavours by the end of this year. Marks and Spencer avoids artificial and nature-identical flavours where possible.

Flavour enhancers

Sainsbury’s, Somerfields, the Co-Op, Marks and Spencers and Iceland do not allow flavour enhancers. Asda will have removed all flavour enhancers by the end of this year. Tesco restricts use of flavour enhancers in its products.
**Sweeteners**

The Co-Op uses sucralose ‘only with written permission’, Somerfield does not permit cyclamic acid, Sainsbury’s will have replaced Aspartame, saccharin and acesulfame k, in soft drinks with sucralose by June. Marks and Spencer allow sweeteners in a limited number of diet products. Tesco has no restrictions on sweeteners. Iceland allows sweeteners only for diet products, labelled on the front. Asda will replace Aspartame with sucralose. Morrisons have also introduced some sucralose-sweetened soft drinks. Waitrose has a list of sweeteners that are restricted and that are prohibited in its products. The Hyperactive Children’s Support Group is not in any way qualified to comment on sucralose (E995), which has been tested and authorized for use by the EFSA. A relatively new sweetener, it is marketed as being made from sugar, by a process that ‘replaces three hydrogen-oxygen groups on the sugar molecule with chlorine atoms’. HACSG’s main concern is that most additives are not tested for their behavioural effects or their cocktail effects. The Hyperactive Children’s Support Group feels that ideally fresh water or natural fruit juices are a more suitable choice for young children.

**Preservatives**

Sainsburys say they do not allow benzoates prefer natural preservatives. Tesco has restricted lists of preservatives, not to be used if possible. Iceland also has restricted lists of preservatives. Somerfield does not allow benzoates. Waitrose has list of preservatives that are restricted and that are prohibited in its products. M&S restricts preservatives.

**Children’s (“Kid’s”) ranges – do they have a separate policy?**

Waitrose adopted the HACSG recommendations for its Food Explorer range, discontinued 18 months ago, with no need amongst their customers for a range of ready meals especially for children, with the issues being the same for the whole family. Marks and Spencer do not allow artificial colours, flavourings, added preservatives or sweeteners in products aimed specifically at the children’s market. Sainsbury’s Kids permits the use of only natural colours and flavours. Sainsburys does allow sucralose in some soft drinks for children, ‘for diabetics’. and flavouringsTesco uses no additives for children ‘where possible’. The Co-Op and Iceland apply their policy to all foods which aids shopping for the whole family.

**What is the rationale for these food additive policies?**

This was of particular interest to HACSG which believes that insufficient scientific research has been undertaken into effects of food additives on behaviour
Sainsburys uses as its rationale scientific evidence, recommendations of HACSG, and customer wishes. Waitrose uses HACSG for its Food Explorer range. Somerfield bases its list of prohibited additives on the HACSG list. Marks and Spencer use the HACSG list of additives associated with behavioural changes extensively and their customer demand. The Co-op say that they have based their list of prohibitive colours, anti-oxidants and flavour enhancers on the HACSG list.

**Labelling**

All respondents operate within the Food Labelling Regulations 1996, most preferring to name the additive and its category, rather than the E number.

Marks & Spencer prefer to declare the category followed by the E number. They only declare the name of the additive when it is something that customers widely recognise, eg sodium bicarbonate.

**Conclusion**

The Hyperactive Children's Support Group feels that there is positive progress concerning the reduction in the use of food additives. This is a positive development for children with ADHD, and also very positive for the rest of the population, including other children and adults who are sensitive to them. HACSG expects to see food manufacturers following this trend and a continuation of improvements.

**HACSG recommendations**

1. **Measures for parents to take:** HACSG recommends that concerned parents use the HACSG ‘Food and Behaviour Diary’ ( downloadable from the website http://www.hacsg.org.uk/) which helps parents identify which foods may be triggering a reaction. We also recommend joining the organisation. There are several other possible nutritional aspects to ADHD to be considered, such as blood sugar dysregulation, vitamin, mineral and essential fatty acid deficiencies, mineral toxicity, and food allergies. There are a number of HACSG publications which will be found helpful.

2. **NICE Guideline for ADHD:** HACSG strongly believes is essential that the forthcoming NICE Clinical Guideline for ADHD, due to be published in April 2008, should include dietary and nutritional treatments for ADHD. HACSG would like to see NHS consultants implementing dietary measures as a first physical treatment after making a diagnosis of ADHD. HACSG believes that the evidence to support this approach can no longer be ignored, and that it is manifestly in line with public demand.
3. **Sweeteners in school food:** In the light of current public concern, HACSG renews its call to the school meals review panel for artificial sweeteners to be disallowed from the milk drinks in the New Nutritional Standards for school lunches.

4. **HACSG calls for the EFSA authorisation process to test food additives for behavioural effects in humans and for long term toxicological effects.**

Editors Notes:
NICE (National Institute for Health and Clinical Excellence): One of NICE’s functions is to provide guidance for doctors, in the form of written guidelines, on the appropriate treatment and care in clinical practice of people with specific diseases and conditions within the NHS.

**More about the Hyperactive Children's Support Group**

HACSG was founded in 1977 by Sally Bunday and Irene Colquhoun to help children with ADHD and their families, and also to promote research into possible biochemical causes of the syndrome.

The Charity is the foremost proponent of a dietary approach to ADHD (Attention Deficit/ Hyperactivity Disorder). It offers advice and support to parents of children diagnosed with the condition. Sally Bunday and Irene Colquhoun were the first to propose a deficiency of essential fatty acids being a factor in ADHD, a connection which is widely recognised now.

HACSG lobbies for recognition amongst doctors and parents of a connection between diet and behaviour, as a first port of call, before drugs are prescribed for the condition. The Charity also runs workshops for teachers, parents and social workers on the dietary approach to ADHD.

Recently HACSG has recently launched its Highest Award, for excellence in school food provision, with Hampshire County Council Catering Services achieving this award.

Sally Bunday received an MBE in 2006 for her work with children.