



## **SOUTH AFRICAN ASSOCIATION OF THE FLAVOUR & FRAGRANCE INDUSTRY**

### **POSITION PAPER**

22<sup>nd</sup> April 2005

Recent concerns, highlighted in the press, about the use of colourants in food products led SAAFFI to call a Special General Meeting of its Members on Friday, 15<sup>th</sup> April 2005.

There are a number of occasions where users of flavourings request that colourants be added to the flavours in order to ease their production process. This is particularly true of companies manufacturing savoury snack foods. Although there are clear regulations concerning which colours may be used and the maximum levels at which they are allowed to be present in the ready-to eat product, consumer pressure has resulted in a number of ready-to-eat products being over-coloured.

The colourant level in any ready-to-eat product clearly depends on what has been added to that ready-to-eat product during its manufacture. In most cases where a colourant has been added to a flavouring to be used at a given dosage level in production, the level of colourant in the ready-to eat product will be within the legal limit. However, if colourant is also added as a separate ingredient in the recipe of the ready-to-eat product, the total level of colourant in that ready-to-eat product could be over the legal limit.

At the meeting on Friday 15<sup>th</sup> April 2005, a number of agreements were reached that should have a positive influence on the quality of ready-to eat products on offer to consumers.

1. SAAFFI Members will immediately check the formulations of all their flavourings which contain colourants, to ensure that, after midnight on Sunday, 15<sup>th</sup> May 2005, all such products leaving their factory gate conform to the regulations relating to food colourants, when used at the recommended dosage.
2. Should it be necessary to modify any formulation of a flavouring containing colourant, the resulting modification will be clearly distinguishable from the original by way of a different code, reference number or other such traceable system.
3. SAAFFI Members will insist that their colourant suppliers clearly state the percentage dye content on every certificate of analysis. This is needed to ensure that maximum permitted levels are not surpassed when combining colourants with flavourings. For the same reason, it is strongly recommended that SAAFFI Members use colourants from reliable suppliers.
4. SAAFFI Members agree to help their clients better understand the complexities of adding colourants, especially in those cases where the colourant is being supplied as part of the flavouring.

5. SAAFFI will have a meeting with the National Department of Health to help draw up a road map with the aim of clearing any offending products out of the system.
6. SAAFFI is aware that there is an urgent need to standardize colourant testing methods on one that is internationally acceptable. Members will be kept up to date on progress. Once this has been sorted out, SAAFFI will circulate to its Members a list of accredited laboratories for colour testing.
7. SAAFFI will maintain close contact with the CGCSA to help establish systems to minimize the chances of unscrupulous flavour suppliers and/or savoury snack food manufacturers and other food manufacturers breaking the law in the future
8. SAAFFI Members will ensure that very clear recommended dosages are part of offers for flavourings that incorporate colourants.

The Regulations relating to Food Colourants (GR No R1008, 21 June 1996) as amended by Government Notice No. R.1055 of 3 September 1999 are very clear.

To be especially noted are the following:

No person shall sell any foodstuffs to which any colourant has been applied or added, except in so far as provided for as follows:

- (a) Only the colourants listed in Annex 1 may be used as colourants in foodstuffs.
- (b) Colourants may be used only in the foodstuffs listed in Annexes III, IV and V and subject to the conditions specified therein.
- (c) Colourants shall not be used in the foodstuffs listed in Annex II, except where expressly permitted in Annex III, IV or V.
- (d) Colourants permitted for certain uses only are listed in Annex IV.
- (e) Colourants permitted in general in foodstuffs and their conditions of use are specified in Annex V.
- (f) The maximum levels indicated in the Annexes relate to foodstuffs in the ready-to-eat form, unless otherwise stated.

As far as maximum levels are concerned, here is Table 3.

**TABLE 3**

The colourant referred to in table 2 may be used in the following foodstuffs up to the specified maximum level:

Foodstuffs	Maximum level (as pure dye) (mg/kg unless otherwise indicated)
Breakfast cereal.....	200
Candied fruits.....	200
Canned strawberries.....	200
Canned vegetables.....	200
Decorations and coatings.....	500
Desserts.....	150
Dietary supplements.....	GMP
Edible cheese rind and edible collagen casings.....	GMP
Edible ices.....	150
Fine bakery wares (eg viennoiserie, biscuits, cakes and wafers)	200
Fish and crustacean pastes or pates, fish roe, salmon substitute, surimi and smoked or preserved fish .....	500
Flavoured dairy products.....	150
Formulae for particular nutritional uses.....	50
Jams, jellies, marmalade and fruit spreads.....	500

Non-alcoholic flavoured drinks (including fruit beverage products, but not fruit juices) .....	100mg/l
Preserves of red fruits.....	200
Processed cheese.....	200
Ready-to-eat savouries (Until 1997-12-31):	
- Extruded or expanded savoury snack products.....	350
- Other savoury snack products and savoury coated nuts	200
Ready-to-eat savouries (From 1998-01-01):	
- Extruded or expanded savoury snack products.....	200
- Other savoury snack products and savoury coated nuts	100
Sauces, seasoning and condiments.....	500
Soups and broths.....	300
Sugar confectionary.....	300
Vegetables in vinegar, brine or oil, including achar...	150

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