

# The FOOD MAGAZINE

Campaigning for safer, healthier food

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## Honey faces GM bombshell

**B**eekeepers are being advised that if they know or suspect that their bees have visited a GM crop trial then they are obliged to indicate this clearly on the honey label. If however the location of trial sites are unknown to them, then MAFF has told the British Beekeepers' Association (BBKA) that non-compliance with this requirement will not be considered an offence. With GM labelled honey unlikely to go down like a spoonful of sugar and with transgressors facing a potential fine of £5,000, the message to beekeepers is clearly 'don't ask'.

And in a further bizarre twist, beekeepers could unwittingly be supplying an illegal foodstuff if their bees visit trial sites of GM oilseed rape. Honey containing pollen from AgrEvo's GM oilseed rape, which is due to flower next spring, would be illegal as this crop is not approved for human consumption.

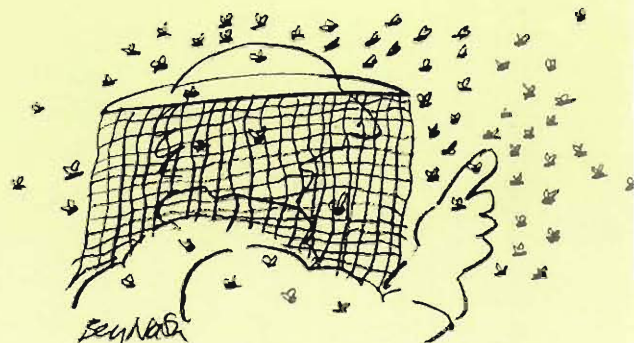
Bees, the crops they prefer and the distance they can travel, have been hotly debated in the GM issue. The government has had to admit that 50 metre 'exclusion zones' around GM crops are

inadequate to keep out bees. Environment Minister Michael Meacher admitted that bees normally foraged over a radius of three miles. Beekeepers themselves consider six miles a safe distance.

The majority of beekeepers are 'dead against' GM crops says British Beekeeper's Association, General Secretary Adrian Waring. 'The vast majority of British honey is GM free and beekeepers want to keep it that way.'

Beekeeper, Frank Eggleston, who lives near the Swindon GM oilseed rape field trial, threatened to destroy his honey if the GM crop came into flower, as he didn't want to be responsible for putting GM pollen into the human food chain. His decision added public pressure on the farmer to plough the crop before it flowered.

But if the number and size of trials continues to grow, many beekeepers may call it a day. While



"One of you little rascals has been to that naughty field and I want to know who it is!!"

the value of UK produced honey amounts to no more than £10 million a year, the value of bees, as pollinators, to farmers and the environment is valued at £200 million a year. And for consumers it would mean a sad loss of a locally produced, natural food.

### Vitamin enriched sales

A survey by the Food Commission has found that manufacturers are boosting their sales by promoting added vitamins in foods that encourage unhealthy diets.

What was once a laudable effort to improve public health by adding extra nutrients to our daily food has, says the report, become a means of improving sales by adding apparent value and 'parent appeal' to food criticised as 'little more than junk'.

Examples from the Food Commission's survey of over 250 products include iced 'gem' biscuits sold



as 'nutritious snacks', chocolate products, jelly sweets, soft drinks and breakfast cereals with added sugar, all featuring added vitamins as a marketing tool.

The Food Commission believes that the cynical use of vitamin fortification gives misleading nutrition information to shoppers trying to choose a healthy diet for themselves and their children.

■ See report summary, pages 9-11.  
Full report available £125.



This fortified breakfast cereal is over 56% added sugars.



These iced biscuits contain more sugar than any other ingredient.

Get the facts with the Food Magazine

The *Food Magazine* is published quarterly by The Food Commission, a national non-profit organisation campaigning for the right to safe, wholesome food. We rely entirely on our supporters, allowing us to be completely independent, taking no subsidy from the government, the food industry or advertising.

We aim to provide independently researched information on the food we eat to ensure good quality food for all.

The Food Commission Research Charity aims to relieve ill health and advance public education through research, education and the promotion of better quality food.

*Co-directors:* Sue Dibb and Tim Lobstein  
*Information Officer:* Mary Whiting  
*Research Officers:* Rachel Sutton, Marjon Willers.

*Office & Subscriptions Manager:* Ian Tokelove  
*Food Irradiation Campaign Officer:* Martine Drake.

#### Editorial Advisors:

Joanna Blythman, Dr Eric Brunner  
Tracey Clunies-Ross, Prof Michael Crawford, Derek Cooper, Alan Gear  
Robin Jenkins, Prof Tim Lang  
Suzi Leather, Dr Alan Long, Jeanette Longfield, Dr Erik Millstone, Dr Melanie Miller, Charlotte Mitchell  
Dr Mike Nelson, Dr Mike Rayner,  
Dr Aubrey Sheiham, Iona Lidington  
Simon Wright.

*Cartoons:* Ben Nash.

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■ Typesetting and design by Ian Tokelove of the Food Commission and Sarah Dobinson of Axiom Design, 185 Wardour Street, London W1V.

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**The Food Commission (UK) Ltd**  
94 White Lion Street  
London N1 9PF

Telephone: 020 7837 2250

Fax: 020 7837 1141

email: foodcomm@compuserve.com

## Food Pollution

*'We must assume all crops contain some traces GMOs now,' an EC official confided to the Food Commission in September. 'It is just a matter of the degree of contamination that is now to be discussed.'*

This depressing approach to environmental pollution is now being transferred to food pollution. The label on your food may say 'GM Free' but the small print will allow up to 1% GM material (see page 4). This is equal to a teaspoon of GM soy beans in every can.

Meanwhile beekeepers are alarmed that GM field trials could put them out of business. They are being urged not to ask if there are GM crop trials near their hives if they want to sell their honey as GM free (see front cover). Once again, the government is taking a sloppy attitude to GM pollution, having authorised the field trials that now threaten what was once a wild, natural product.

At the other end of the spectrum, we find that foods which are far from wild and natural – sweet latty biscuits, soft drinks, confectionery and sweet breakfast cereals – are having their image enhanced by companies keen to sell them as healthy (see pages 9-11). The claim is made on the basis of added vitamins and minerals. Food fortification thus becomes the latest means of undermining messages about healthy eating.

We have the weakest fortification laws in Europe. As legislation gets drafted, we urge the European Union: *Don't let sloppy UK practices pollute Europe's food!*

Tim Lobstein and Sue Dibb

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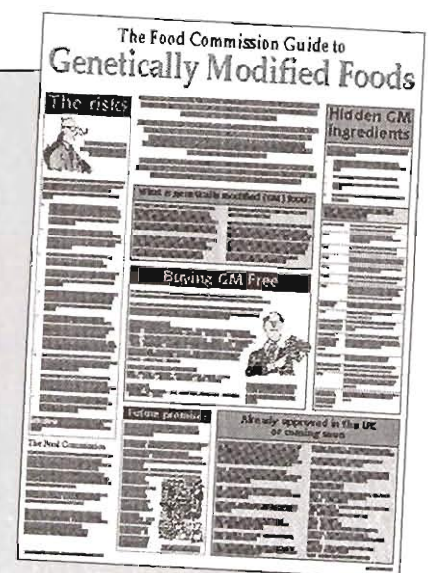
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## The Food Commission Guide to Genetically Modified Foods

- ◆ What is genetically modified (GM) food?
- ◆ Hidden GM ingredients (including a list of potential GM additives)
- ◆ How to buy GM free
- ◆ The risks of GM agriculture
- ◆ The future promises
- ◆ Approved GM crops and those coming soon

This large format, colourful poster is essential reading for anyone who wants to understand this complex issue. To order your copy or copies please turn to page 16 of this magazine. The poster costs only £2.00 and postage and packing is free!



**Advertising Policy.** The *Food Magazine* does not accept commercial advertising.

Loose inserts are accepted subject to approval – please contact Ian Tokelove at The Food Commission for details

# Back to school special

School holidays ended in September with a flurry of food products designed to fill our children's lunch boxes. We take a closer look at what we are encouraged to feed our kids.

■ Miniature pot noodle-type packs boasting of its added soya pieces and dried vegetables. The soya and

vegetables are last on the ingredients list, indicating that there are less vegetables than there is added colouring and added flavour enhancers (monosodium glutamate etc).



■ Miniature easy-open tins of jelly thickened with carageenan and gum, with added flavouring and colouring, with some 15% sugars.

■ Squeezy tubes of fromage frais with added sugar taking it to 14% sugars, with flavourings, colourings, starch thickener, three forms of gum thickener and preservative.



■ Sliced Dinosaur turkey roll 'formed from cooked meat with added water' contains mechanically recovered poultry meat, starch, salt, sugar and eleven additives, five of them designed to hold the paste together.

■ Xtreme Dipz described as 'Cheesy baked bean dip with tomato flavoured toasted wheat scoops' has six additives including monosodium glutamate and aspartame. Indeed the product appears to be illegally labelled as it fails to state 'with sweeteners' next to the name of the product. They do, however, say 'Suitable for vegetarians'.



■ 'Pocket packs' of chocolate biscuits, described as 'ideal for lunch boxes'. These are 30% sugar and 7% 'milk equivalent' but boast on the pack how they are 'made with 4 cereals and milk'.



West Sussex County Council have gone as far as they can to deprive children of healthy lunch-times -- not only have they abolished school meals but they have now cut school water from the menu! Schools are telling all parents that they must pack a 'drink' with their child's lunch.

Meanwhile, our sharp-eyed readers have spotted promotional gimmicks from both Sainsbury and Tesco aimed at children this autumn.

Sainsbury is circulating to mothers of young children a set of vouchers for money-off the following:

- Instant snack pots
- Hot dog sausages
- Smarties sweets
- Rice Pops sweetened cereal
- Fruit tea
- Diced swede and carrot

Diced swede? Presumably they will say that they tried offering vegetables but no-one wanted them, so they won't bother again.

Tesco have gone several steps further with their Schoolzone Starter Kit ('Every little helps'). Their money-off vouchers, given away by schools, are aimed directly at youngsters and offer:

- Custard
- Processed cheese
- Milkshakes
- Rowntree jelly
- Cheeze Dippers
- Chocolate
- Peperami
- Crisps
- Sunny Delight
- Other soft drinks
- and meat paste

Without any sense of irony, the promotional booklet from Tesco also includes a chance to subscribe to 'M' magazine, with its leading article 'Fat is a Family Issue!'

Nutritionist Martina Watts, whose youngest child started school in September, was appalled at the types of foods being promoted, with their additives and added salt and sugars, and lack of real fruit or vegetables. She wrote to Tesco to say 'As a parent it is almost impossible to walk the tightrope of healthy eating in the face of constant media bullying with brightly coloured, packaged junk foods which are more show than substance. Please make it easier for us and the teachers dealing with increasing behavioural and immune problems, and suggest something a bit more wholesome... had you intended to produce a booklet of goodies guaranteed to create a classroom of disruptive and inattentive kids, you could not have done a better job.'



## Schools

Get our poster on genetically modified foods. It is an easy-to-understand guide to the pros and cons of genetically modified food and it only costs £2.00. See the opposite page or turn to page 16 to order your copy now.

**School Meals**  
Could I remind all parents to include a drink in their child's packed lunch. Although water is available from the drinking fountains this is not accessible while children are eating their lunch and we are no longer able to provide cups of water.

Source: Ilfield First School, Newsletter Sept 1999

# 'GM free' will mean 1% GM, says EC

'GM-free' foods and ingredients will be legally allowed to be contaminated with 1% GM material if European Commission (EC) proposals get the go ahead on 21 October. As we went to press the EC issued its long-awaited proposals on the meaning of GM free and the labelling of GM additives (see below).

The EC says it will be impossible to prevent accidental GM contamination of non-GM soya and maize ingredients and foods, either during cultivation, harvest, transport, storage or processing. It therefore proposes that where this happens ingredients can still be considered 'GM free' as long as the level of contamination does not exceed a threshold of 1%. The level of contamination for each ingredient, and the contamination of the whole food, must both be less than 1%. If the food or an ingredient contains GM material at levels greater than 1% it will need to be labelled.

Companies will also need to be able to show that their ingredients are of non-GM origin and they have in

place a well audited identity preserved (IP) system and have taken all steps to keep the level of contamination to a minimum.

In our last issue (*Food Magazine 46*) we reported on the different threshold levels supermarkets were already operating. We found many of the retailers that have been leading the way towards eliminating GM ingredients are already working to maximum threshold levels of 0.1% – ten times less than the 1% the EC looks set to agree. We have already written to the UK Food Minister, Baroness Hayman saying that consumers expect GM-free to mean exactly that.

We believe that any level above 0.1% will not meet consumers expectations and will undermine the considerable efforts made by food companies and retailers to ensure that their sources of non-GM ingredients can be guaranteed to be effectively 100% non-GM. Baroness Hayman has agreed to meet us to discuss this and other GM labelling matters.

## GM additives to be labelled

The European Commission has brought forward proposals for the labelling of GM additives, currently excluded from GM labelling requirements. It is intended that agreement should be reached at the October meeting of the Commission's Standing Committee for Foodstuffs. The Commission paper proposes that foods and food ingredients containing additives and flavourings that have been genetically modified, or have been produced from genetically modified organisms, should be labelled. But the small print reveals numerous loopholes that will mean, as with rules on labelling of other GM ingredients, that the vast majority will in fact not be required to be identified on food labels.

The Food Commission has identified fifty E number additives as well as an unknown number of

flavourings which could be derived from GM maize or soya. But, as with GM ingredient labelling, these will only need to be identified if they contain measurable amounts of DNA or protein.

In effect it will mean that the vast majority of additives and flavourings derived from GM soya and maize will not need to be labelled, even after the introduction of laws requiring the labelling of GM additives and flavourings. As highly processed ingredients few are likely to contain measurable amounts of DNA or protein (the emulsifier lecithin is the main exception here).

Furthermore processing aids are excluded from these labelling regulations. This will include enzymes produced using gene technology.

## Bill for organic targets

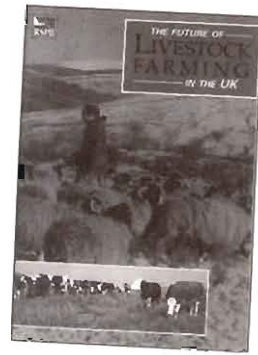
A campaign to promote organic food is launching a Parliamentary Bill designed to put organic targets into law. The Bill will require the government to draw up plans to ensure that by 2010:

- at least 30% of UK agricultural land is organically farmed;
- at least 20% of food consumed in the UK is certified organic;
- all sections of society have reasonable access to organic produce.

■ Further details on this campaign from Vicki Hird, Sustain, 020 7837 1228.

Bird power: What can a livestock farmer do to enhance sustainable environments? This report from the Royal

Society for the Protection of Birds examines the role of such farmers and the need for them to move towards low input livestock systems, linked to environment management standards and some farm diversification. The meat of this surprisingly readable report lies in its proposals for tiered support through CAP reform. Contact RSPB on 01767 680551



## Threat to organic meat

Organic meat producers say the fall in the number of abattoirs in the UK leaves inadequate facilities for local slaughter or organically reared animals. Now, if government plans to increase meat hygiene charges go ahead, many more will close within the next two years.

*'If animals have to travel further to*

*slaughter the animal welfare benefits and whole ethos of local meat marketing initiatives will be lost,'* says Jonathan Dimpleby, President of the Soil Association and himself an organic beef farmer.

■ Contact Bob Kennard, tel 01597 851655 email: rk@graigfarm.co.uk

## GM oils may be labelled?

The EU is attempting to draw up a 'negative list' of ingredients to clarify its ruling that GM soya and maize ingredients need only be labelled if they contain detectable amounts of DNA or protein. The European Commission asked its technical experts on the Scientific Committee for Food whether refined oils and processed starches do contain DNA or protein and hence whether they should fall within the list of ingredients which companies need to label or whether they would qualify for its 'negative list'.

The Committee's conclusions were published on 17 June this year.<sup>1</sup> It concluded that there was insufficient information to say what type of oils could be included on a 'negative list'. DNA and protein can be found not only in cold-pressed but also (albeit in very low levels) in refined oils. Furthermore it is not possible to specify which refining processes would ensure that DNA/protein are removed efficiently enough to be undetectable.

For starches, no DNA can be detected in starch hydrolysates – i.e. maltodextrins, glucose (dextrose) syrups, glucose (dextrose) although the experts conclude there is no guarantee that refining processes used to ensure that DNA/protein are efficiently removed by industry are commonly applied.

The Food Commission has long argued that GM labelling should be based on the source of the ingredients, regardless of whether DNA or protein can be detected in the final product.

<sup>1</sup> SCF opinion concerning the scientific basis for determining whether food products, derived from genetically modified soya and from genetically modified maize, could be included in a list of food products which do not require labelling because they do not contain (detectable) traces of DNA or protein, 17 June 1999.

<www.europa.eu.int/dg24>

## Food miles keep running

A DC10 airliner can cause as much pollution as 21,539 cars, according to the latest report on food miles. Yet air-freighting of food is likely to double in the next 20 years.

Per tonne-mile, air transport creates twice as much nitrogen oxide as road transport, and 25 times as much as rail and sea transport.

Road transport itself creates 50 times as much carbon dioxide as rail transport, per tonne moved. Yet within the UK we are increasingly hauling our food up and down our roads. In 1978 some 290m tonnes of food were transported an average of 80 kilometres. By 1988 this had risen to 300m tonnes travelling an average 100 kilometres.

By last year it had risen substantially further — a total of

346m tonnes travelling an average of 123 kilometres.

Food that travels long distances may need more packaging to retain product quality. The cargoes may be treated with fungicides and pesticides, and processed foods treated with preservatives, to prevent spoilage. The foods that travel well may not be the ones that provide the best nutrition, and indeed — as in the case of processed foods versus fresh ones — may displace local fresh foods from being available.

This is the story being told by the Food Miles Campaign in their latest report: *Food Miles — Still on the Road to Ruin?*

■ For details contact Sustain, 020 7837 1228. The report costs £7.50.

## Load of bullocks

Princes, the canned meat manufacturers, took great offence when the *Guardian* published a leaked draft report from the government's Pesticide Safety Directorate showing significant traces of the banned pesticide DDT in the company's corned beef.

The final report was different to the leaked draft, and did not show DDT in the product.

Princes not only threatened legal action but also took out large adverts (see below) declaring their innocence and stating that 'Our Quality Assurance team ensures all products meet our stringent specifications

which do, of course, forbid the use of banned pesticides.'

What a shame that they did not read the government's final report carefully enough. The report found most Princes products to be blameless, including the corned beef, but that the company's sliced beef did indeed contain traces of banned pesticide — namely DDT — at higher levels than other canned meats.

■ You can see for yourself on the web: <[www.maff.gov.uk/aboutmaf/agency/psd/wppr98/reports/contents.htm](http://www.maff.gov.uk/aboutmaf/agency/psd/wppr98/reports/contents.htm)>, table 23, reference sample 0245/1998.

# BRITAIN'S No1 BRAND

**RECENT PRESS  
REPORTS LINKING  
PRINCES CORNED BEEF  
TO PESTICIDE  
RESIDUES ARE WRONG.**

THE GOVERNMENT HAS CONFIRMED THAT PRINCES CORNED BEEF HAS NOT BEEN NAMED IN THE RECENT REPORT OF THE PESTICIDE SAFETY DIRECTORATE.

YOU CAN THEREFORE CONTINUE TO ENJOY PRINCES CORNED BEEF WITH COMPLETE CONFIDENCE.

At Princes, we use the best quality ingredients. Our Quality Assurance team ensures all products meet our stringent specifications which do, of course, forbid the use of banned pesticides.



## McLibel campaign aims to ban TV ads

The McLibel Support Campaign is urging members of the public to submit complaints about the current television advertising to children of McDonald's to the Independent Television Commission (ITC). The judge in the McLibel case found in 1997 that McDonald's exploited children through advertising to pester their parents into going to McDonald's. Since then McDonald's has not changed their advertising strategy in response to the judgement.

The Campaign says that the ITC, which regulates TV advertising, is not enforcing its own rules for advertisers, which should prevent such exploitation. Of particular concern to the Campaign is the way in which McDonald's advertises its Happy Meals for children with free toys. These advertisements, the Campaign believes, contravene the

ITC rule which prohibits adverts which 'exhort children to purchase or ask their parents.. to make.. purchases'. Furthermore the advertised free gifts could encourage excessive consumption of McDonald's in apparent contravention of another ITC rule. The ITC rules also say advertisements

must not exploit children's sense of loyalty. Yet McDonald's stated strategy is to use 'children's love for Ronald [McDonald] and McDonald's and free

toys 'as one of the best things... to make them loyal supporters'.

Copies of a suggested letter to the ITC are available from the McLibel Support Campaign c/o London Greenpeace, 5 Caledonian Road, London N1 9DX Tel/fax: 020 7713 1269. Website [www.mcspotlight.org](http://www.mcspotlight.org)



## No Olestra for UK

The UK, and the rest of the European Union, will not be seeing the controversial fat-replacer Olestra, in foods on our supermarket shelves. The developers of the 'no-fat fat', Procter & Gamble, say that they have abandoned plans to pursue European approval. As we reported last year (*Food Magazine 43*), P&G were facing an uphill task in convincing European

regulators of the product's value and safety, despite its US approval for use in snacks. There are concerns that the ingredient could reduce the body's absorption of essential fat soluble nutrients and cause digestive upsets and embarrassing conditions known as 'anal leakage' and 'oil in toilet'.

## Single homeless need better diets

The majority of homeless people using soup runs and day centres are not meeting their nutritional daily needs, according to a study of inner London single homeless people.

Less than a third of 423 participants were eating vegetables on a daily basis, and the majority seldom ate salads, fruit, fruit juice or wholemeal products. Diets were high in saturated fat and non-milk sugars. Intakes of dietary fibre, antioxidant vitamins and trace minerals were low.

The authors of the report suggest that much of the problem lies in the foods offered to single homeless people by the day centres and soup runs they attend, and they call for improvements in the access to healthier foods.

■ Food, health and eating among single homeless and marginalized people in London, NS Evans and EA Dowler, *Journal of Human Nutrition and Dietetics*, 12, 179-199, 1999.

# Public health vs the GATT

## World trade needs control, not liberalisation, argues Professor Tim Lang

A new phase is unfolding in an old struggle between forces that seek to control food and those that seek to democratise it. If the new round of the GATT talks, to be launched at the WTO meeting in November, are a repeat of the round which lasted from 1987 to 1994, there will be hardly a murmur raised on the health score.

Such a nightmare scenario cannot be allowed to happen. Food and agriculture are fundamental to human life and culture. Along with genetics, food is a key determinant of whether humans achieve health or suffer ill-health. Yet health is implicitly taken by trade liberalisers as a threat to the pursuit of wealth and a barrier to international competitiveness. This concept is both irresponsible and untenable.

The new round of the GATT will witness attempts to promote further big changes in the food and agriculture system. Many will lose from these changes, and many will benefit — notably the rich and the corporate sector. This is largely because it is they who have framed the terms of reference for the trade talks after years of lobbying and political influence.

But further trade liberalisation is not inevitable. We must ensure that the

GATT agenda includes the threat that liberalisation can bring to:

- human health — undermining healthy diets, encouraging processed products at the expense of fresh and wholesome ones;
- environmental health — encouraging more intensive agriculture, excessive food miles and animal feed miles, reduction in biodiversity;
- social health — encouraging neo-colonialist food culture by promoting 'Western' dietary patterns to the exclusion of original cuisines;
- social justice — undermining attempts to reduce poverty, especially through the destruction of rural communities.

Two different models of food production can be described. The first, a neo-liberal model, treats food like any other commodity, in which the price and the market mediate the supply, and in which the driving force for change in production is the return on capital and the efficient use of labour.

The second model, an ecological one, takes as its goal the long-term

sustainability of food production. Food is produced to serve the needs of the many rather than the few.

The division throws up contrasting approaches to health and nutrition. Do we improve the food supply, so that the foods available are more likely to sustain good health, or do we encourage all forms of food production and hand out dietary guidelines, leaving individuals to choose from whatever the market is offering? Do we encourage population-wide strategies or do we target 'at risk' groups with advice? Do we look at the total diet or do we encourage the use of functional foods and food supplements to change the balance of nutrients?

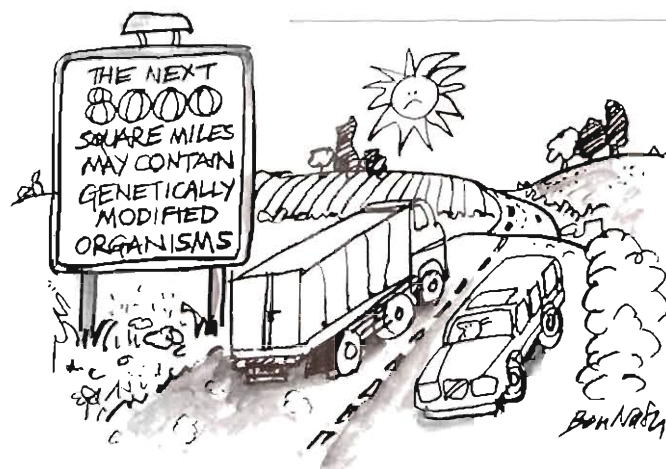
And how do we want our food produced? The thrust of intensive farming is to reduce the need for labour and increase the use of machinery and chemical and biotechnological controls, applied to 'efficient' monoculture crops. Small farming businesses and local subsistence farming would have little role to play in this view of food production. Some small farmers may find they can serve specialist markets, but will not participate in international

trade.

Small farmers in poor countries will find they can serve no market at all, and the impoverishment of rural communities will soon force them into desperate measures — including the over-exploitation of their land until it becomes useless.

Food is too important to be left to commodity traders to determine its production. It is not enough to treat the health impact of food as a matter of risk assessment, or an item in cost-benefit analysis. This implies that the purpose of producing food is to make money, with nutrition, culture and the environment as marginal issues. But these are central to our health and well-being. Health must be placed at the top, not in the margins, of the agenda for the new GATT.

■ A detailed examination of health and trade issues, entitled *Food, globalisation and a new public health agenda*, has been prepared by Tim Lang with Michael Heasman and Jillian Pitt. Contact the Centre for Food Policy, Thames Valley University, on 020 8280 5070.



## Baby food contamination

A toxic chemical used in the lids on jars of baby foods is contaminating the foods inside says a government report. Epoxidised soya bean oil (ESBO) which is used to seal jars and prevent microbiological contamination was found in 48% of the 137 samples of baby food tested. Government expert advisors conclude there is no immediate risk to health but want companies to further reduce levels of ESBO in baby foods packaged in glass jars.

■ MAFF Food Surveillance Information Sheet No 186 also available on MAFF's website: <http://www.maff.gov.uk/food/infosheet/index.htm>

## WTO and your right to choose

Consumers' right to choose GM free food could be under threat from the World Trade Organisation. The WTO's so called 'Millennium Round' of international trade talks are due to start in Seattle at the end of November. Consumer and environmental organisations from around the world say if the talks go ahead as proposed, the interests of trade will be put before environment, food safety and consumer choice.

WTO rulings have already undermined Europe's support for small-scale Caribbean banana producers, and our ban on US beef produced with steroid growth promoters. And with the US

considering that labelling of GM foods, agreed in Europe, Japan, Australia and New Zealand is a 'barrier to trade', there are fears that any further trade liberalisation measures could make it impossible for governments to, for example, impose labelling regulations, let alone introduce a moratorium on importing GM foods or growing GM crops. Furthermore the proposed talks may take away the right of developing countries to say no to GM technology. And organic farmers even fear they may in future be prevented from labelling their food as 'organic'.

The Five Year Freeze Campaign, of which the Food Commission is a

member, is urging organisations and individuals to contact their MP, either by letter or with a personal visit, requesting that they urge the UK government delegation at the talks to defend consumer choice, permit countries the right to say no to GM food and crops on the basis of the precautionary principle, and allow countries the right to say no to the patenting of genetic resources for food and farming.

The Five Year Freeze Campaign has produced a brief guide to the WTO, a Take Action leaflet and a draft letter to MPs. For a copy send a SAE to Five Year Freeze Campaign, 94 White Lion Street, London N1 9PF.

# One fish, two fish

**Oily fish helps protect against heart disease but according to a government report we may be consuming high levels of toxic dioxins if we eat more than one portion a week. How, asks Sue Dibb, can consumers reconcile this conflicting evidence? And what should MAFF have said?**

This summer the Ministry of Agriculture, Fisheries and Food (MAFF) released the findings of its first survey of dioxins and PCBs in a range of seafood and fish products including fish fingers. The implication of its results is that people who eat fish more than twice a week are likely to exceed World Health Organisation safe limits for these toxic pollutants. Young children are also likely to be at risk of exceeding 'safe' levels (see box).

As is usual with such surveys, MAFF published the results in a Food Surveillance Information Sheet and posted the results on its website, although it chose not to put out a press release. This has led to accusations that MAFF chose not to publicise the study's findings, although it denies this. MAFF didn't put out a press release, it says, because it didn't consider the results to be newsworthy as they were 'as expected'. It wasn't until Environmental Data Services carried a critique of the survey's results in its *ENDS Report* that the popular media picked up on the story and another food scare was born.

As so often has been the case, MAFF appeared wrongfooted over the way it publicly releases its advice and information. So how should MAFF have handled the release of this data and what lessons should the new Food Standards Agency learn from MAFF's mistakes? The Food Commission offers the following advice:

## 1) See the bigger picture.

Dioxins have been this year's food contamination scandal, thanks to the Belgian company which contaminated animal feed with non-foodgrade industrial oil heavily contaminated with dioxins. It was a miscalculation, therefore, for MAFF to consider that a

report about dioxin contamination of food would not be 'newsworthy'.

## 2) Give clear information and advice.

MAFF side-stepped issuing new advice to consumers but repeated previous government health advice that adults should continue to eat at least one portion of oily fish a week to help prevent heart disease. The implication was that adults shouldn't eat more, though this wasn't spelled out. And the report fails to give any advice for more 'at risk' groups such as children and pregnant women, even though MAFF's figures clearly showed that young children were likely to be consuming higher levels of dioxins than

recommended by the World Health Organisation.

## 3) Put risks into perspective.

Any risks from dioxin contamination of fish should have been weighed against possible health benefits from eating oily fish as has been the case when relatively high levels of dioxins have been found in breastmilk. In that case clear advice was issued that, despite such contamination, breastmilk continues to be the best source of nutrition for babies.

## 4) Don't patronise.

MAFF subsequently told the media that fish pose no health risk to the public. But the 'it's all perfectly safe' line doesn't wash with consumers. BSE and concerns over the safety of genetically modified food have made consumers more sophisticated. We know that absolute safety can rarely be guaranteed. We need to know that action is being taken to eliminate risks as far as is possible and in the meantime we need some measure of risk in relation to benefits so that we can make up our own minds about the

level of risk we choose to take. An older person whose arthritis is relieved by fish oil supplements, for example, may be less concerned about possible toxin risks than a pregnant woman.

## 5) Get your message across.

By not publishing a press release, MAFF failed to put across to the media, and hence to the wider public, a coherent message that put possible risks into perspective and carried clear advice on what levels of fish it was safe for people to consume, both adults and other at risk groups such as children and pregnant women. This would have prevented accusations that MAFF failed to publicise the data and could have prevented 'scaremongering' media reports.

## 6) Ensure effective action is being taken to reduce/eliminate the problem.

Dioxins and PCBs are widespread environmental pollutants. Environmental Data Services says that levels in food probably peaked in the 1970s, since when increasing controls have reduced dioxin levels in the environment. MAFF's report states that monitoring for dioxins and PCBs in the UK diet should continue but could have briefly stated what action nationally and internationally is being taken to ensure that levels continue to fall.

## Dioxins and fish

- Dioxins and PCBs are persistent widespread environmental pollutants which result from industrial processes. They are generally present in low concentrations in foods, especially fat-containing foods including milk, meat and fish. They are implicated in causing cancers, endocrine disruption and reproductive, developmental and neurological problems.
- Last year the World Health Organisation reduced the maximum intake of dioxin considered safe from 10 to 1.4 picograms TEQ per kilogram of bodyweight per day. The recommendations have still not been formally accepted by the UK government which still uses a Tolerable Daily Intake (TDI) of 10pg TEQ/kg/day.
- The MAFF survey looked at levels of dioxins and PCBs in sea fish, farmed fish and fish fingers sold in the UK.
- Oily fish, including mackerel, herring, salmon, tuna, pilchards and sardines, are likely to contain higher levels because of their higher fat content. Plaice and herring contained particularly high levels; plaice probably because as bottom-dwellers they could be contaminated from sediments, and herring, because they are non migratory and may reflect local contamination from 'hot spots'. Fish were analysed raw although levels of dioxins and PCBs may be lower in cooked fish.
- MAFF calculate that 'average' adult consumers (eating less than one portion of oily fish a week) consume 2.6 pg TEQ/kg/day of PCBs and dioxins with approximately 20% coming from fish. But 'high level' consumers exceed the WHO limit at 5.6pg TEQ/kg/day with over 60% coming from fish.
- Average children under four were also likely to exceed the tolerable intake. The average child aged 1 1/2 to 2 1/2 was calculated to get 6.3pg TEQ/kg/day but 'high fish consumers' were exposed to 9.9 TEQ/kg/day. MAFF say these figures should be treated with caution because of assumptions made in their calculation.

## Benecol needs better labelling

The government's Food Advisory Committee (FAC) has recommended that products containing phytosterols, such as the Benecol cholesterol-lowering range of foods, should have clear warning statements that the product is unsuitable for young children and pregnant and breastfeeding women.



The FAC has been concerned for some time that these products may pose a problem for some vulnerable groups, and previously recommended that health workers and magazines might be able to convey their reservations about these products. In September they noted 'continuing concern' about such cholesterol-lowering products and called for warnings on product labels.

Meanwhile the claim on the front of Benecol packs that the products can help lower

cholesterol 'as part of a healthy diet' has been challenged in the medical press. A report in the *British Medical Journal* noted that tests showed phytosterols in spreads had cholesterol-lowering effects for people eating unhealthy diets, but not for people eating healthy, lower fat diets, i.e. containing the recommended 30% or less energy from fat. The study concluded that 'in those following a healthy fat-modified diet this costly product is unlikely further to reduce lipid concentrations.'

■ Cholesterol lowering margarine may not be useful in healthy, fat-modified diet, *British Medical Journal*, 349, 186, 17.7.99.

## Iceland turns up the heat

Moves by the supermarket chain Iceland to ban genetically modified food from their products have been followed by further action to ban certain additives and set higher quality standards for their own-brand foods.

We welcome their initiative and hope other supermarkets follow, or go further on this ambitious project. We also have some reservations about how far Iceland will actually go, and what the effects will be:



### Iceland promises

No GM ingredients  
No artificial colours  
No aspartame  
No artificial flavours  
No monosodium glutamate  
No artificial preservatives  
No mechanically recovered meat  
Meat will be from animals reared on a vegetarian diet  
No hormones for growth promotion  
No BST for milk production  
The only retailer to take the giblets out of frozen chickens  
Clearer labelling of allergens  
Clearer labelling of net weights before glaze on frozen fish and vegetables  
Reducing salt levels  
Reducing sugar and fat content  
Clear nutrition labelling  
More frozen organic food, at affordable prices

### Our comments

They are still working on removing GMs from animal feed and processing aids such as GM enzymes.  
So-called natural colouring agents will still be used.  
This is still being worked on by Iceland. What will they use instead?  
This will be difficult to monitor as labels do not declare the flavouring ingredients.  
Will that mean more salt?  
Iceland add 'but only where it is safe to do so'. And what alternative preservatives are they proposing?  
Iceland's policy for over 10 years, and still welcome now.  
Does this include pigs and poultry, that are natural omnivores? Iceland will allow 'a fish meal supplement where appropriate' — an ingredient widely used in lamb production.  
These are banned anyway. What about antibiotics used for growth promotion?  
This is banned anyway.  
What is wrong with giblets, a nutritious part of a chicken? Great for stocks and gravy.  
Excellent.  
Excellent.  
Excellent.  
Excellent.  
This could still benefit from better visual design.  
Three cheers for that!



Green versions of the Yellow Pages: Green Guides are a series of regional guides to suppliers of green products and services for London, Bristol/Bath, Manchester, Scotland, Wales and Birmingham/Midlands. Contact Green Guide Publishing, 020 7354 2709.



Lettuce leaves: The latest report from Sustain, formerly the SAFE Alliance, in their series of *Food Facts*. The facts on lettuce

show pesticide applications have risen 600% in a decade, with the average crop now sprayed with 11 chemicals. Nitrate pollution and cheap labour using illegal gangmasters are also examined. Price £5. Contact Sustain on 020 7837 1228.

GE Resistant Groups: this is a wonderful guide to GE Resistant and GE Tolerant organisations around the world, produced by Action for Solidarity, Equality, Environment and Development (A SEED). The group also has briefing sheets on companies Monsanto and Novartis, and a website where much of their material is being developed, <[www.groundup.org](http://www.groundup.org)>. Contact them at A SEED Europe, P O Box 92066, 1090 A B Amsterdam, The Netherlands, + 31-20-468 2616.





# CHECKOUT

Special feature on vitamin and mineral fortification of unhealthy foods

## Vitamins – added value or misleading marketing?

**A new report from the Food Commission identifies a growing abuse of the lax laws regarding food fortification in the UK.**



**Does the addition of four vitamins make this sugary soft drink into a healthy food?**

In an extensive investigation of fortified foods, the Food Commission's researchers examined 260 products containing added vitamins and minerals. The majority were found to be foods of poor nutritional quality, including biscuits, sweet cereals and soft drinks, and over 70% contained significant quantities of added sugar, salt and/or fat. Fatty, salty and sugary products are ones we are advised to reduce our consumption of in order to achieve a healthy diet.

As this magazine has previously reported, the European Commission is in the midst of discussions about harmonising food regulations, including those concerning fortification practices.

Regulations regarding fortification vary widely across Europe at present, with the UK having one of the most liberal policies. Scandinavian countries restrict fortification to very few foods, while Germany, the Netherlands and Belgium limit the nutrients that can be added to foods, and France and Italy only allow the fortification of foods for special dietary needs.

### Profile of fortified foods

260 fortified products compared with Department of Health guidelines for high levels of fat, sugar and salt.

	No. of products	% of sample
Over 10% sugar by weight	129	50%
Over 30% energy from fat	28	11%
Over 0.5 sodium per 100g	97	37%
Excessive fat, sugar or salt	192	74%

NB Not all products gave full nutritional information.

### Fortification's honourable intentions

The practice of food fortification started in 1925 when manufacturers voluntarily added vitamins A and D to margarine. In 1940, when butter – which naturally contains the vitamins – was in short supply, the practice was made compulsory on the grounds that margarine was being used extensively in place of butter and should have a nutritional value similar to butter. The requirements still apply to margarine, but not to lower fat spreads and fat blends, although many add the vitamins voluntarily.

Also in 1940 calcium carbonate was required to be added to white flour (and thereby all white bread, biscuits, cakes and other flour products), and this has been supplemented by the requirement to add thiamin (vitamin B2) and iron to white flour. The addition of iodine to salt was also introduced to reduce the incidence of goitre.

Only the folic acid campaign, introduced to prevent spina bifida, has received government approval in recent years. The campaign includes encouragement to manufacturers to add supplementary folate to a range of foods.

The Food Commission's full report, including details of over 250 fortified products and their nutritional quality, is available for £125. Send order, cheque or credit card details to Publications, The Food Commission, 94 White Lion Street, London N1 9PF (tel: 020 7837 2250, fax: 020 7837 1141). Please allow 14 days for delivery.

# CHECKOUT

## Fortified foods attack good nutrition

**T**here is common agreement among nutritionists that the British diet is energy-rich but not nutrient-rich: i.e. we get too great a proportion of our energy from fatty, salty and sugary processed foods. The answer, according to health workers, is to replace sweet, fatty and salty foods with nutrient-rich foods such as fruit, vegetables, wholegrains, lean meat and fish from the diet. The answer, if you are a food manufacturer, is to boost the nutrient levels in fatty, salty and sugary products.

Fruit drinks, such as Five Alive, Ribena and Sunny Delight, are marketed in similar packaging and put on nearby shelves to pure fruit juices. They are fortified with vitamin C (which happens to help prevent the added colour from fading) and may have other added vitamins, but they are also highly sugared – regular Ribena is 15% sugars against Coca-Cola's 10.5%.

In the case of breakfast cereals, the manufacturers might argue that fortifying their products helps to restore some of the nutrients lost in processing. But when the process also involves adding large amounts of sugar (over 56 grams of sugar per 100 grams in Marks & Spencer's Crunchy

Puffs) we might be less convinced of their benevolent intentions.

And the 'Vitalinea' range of snack foods being promoted by Jacob's (a Danone subsidiary) for their nutritional benefits contain over 40% sugar, yet are recommended by the company's 'nutritionists' as part of a 'nutritious snack'.

### Worse than junk

Many of the fortified foods we examined are promoted as having nutritional benefits, yet these are not foods which would be recommended as an important part of a healthy diet.

For example, Jacob's YumTums Iced Gem biscuits (first ingredient sugar) declare that their product has been 'Developed by nutritionists' to 'provide children with essential energy and vitamins which contribute to a balanced diet' and carries a logo 'Nutritious snacks – vitamins and minerals'.

Yet the current advice from the Department of Health is to ensure our intake of sugary foods is kept down and especially that the frequency of eating sugary foods should be reduced, and preferably limited to meal times only. In other words – *no sweet snacks*.

Such marketing strategies are at odds with the dietary targets of the Department of Health, and effectively use the company's advertising and promotional budgets to undermine good nutrition education.



**Over 80% added sugars, this product boasts 'with real fruit juice and added vitamin C'**

### Controls needed

While the European Commission deliberates on how best to harmonise the market in foods by having uniform regulations across all member states, the Food Commission is calling for a tightening up of the regulations covering food fortification.

Most EU member states restrict or prohibit the use of fortification in many or *all* foods, and this is done in the best interests of protecting public health from misleading marketing campaigns. Manufacturers are seeking to open the doors of these countries to the poor practices found in the UK, whereas the reverse is needed.

We are urging the government to join with the Scandinavian states and agree to strict limits on fortification, allowing only government-approved fortification for clear public health purposes.

We believe that good food doesn't need fortification!

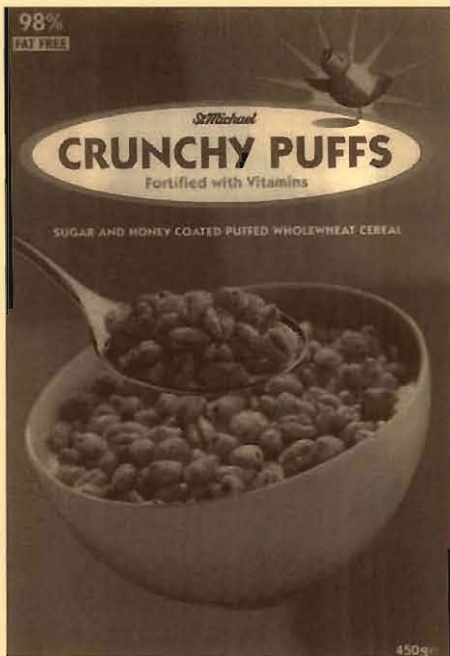
■ Researched by Gillie Bonner, SRD, and Hugh Warwick.



**Health education? This product says that vitamin C is 'for maintaining healthy bones'.**

**Pity about the 38% sugar, which can't be so good for maintaining healthy teeth.**

# CHECKOUT



**Fortified, highly sugared breakfast cereal such as this can mislead consumers about eating more cereal foods.**

**Fromage frais with added sugar – 'Onkyblok is made with all the valuable constituents of fresh milk, and enriched with calcium, riboflavin and vitamin B12'. It is one eighth pure sugar.**



**Sugar-topped biscuits marketed for their 'added vitamins and minerals'.**



**Made of refined flour, sugar, starch, oil and added vitamins, the label's boast that this product is '90% fat free' does not make it a low fat product. Its sister product 'Vitalinea Lemon Crunch Biscuits' says 'Our nutritionists suggest' a snack including five biscuits at tea time.**

In addition to the statutory fortification required by law, we found added nutrients in the following wide range of foods:

Added nutrient	Found in
Vitamin A	biscuits, breakfast cereals, hot drinks, juice drinks, confectionery, yogurt
Vitamin B1	biscuits, bread, breakfast cereals, hot drinks, juice drinks, pasta, yogurt
Vitamin B2	biscuits, breakfast cereals, hot drinks, juice drinks, pasta, yogurt
Niacin	biscuits, bread, breakfast cereals, hot drinks, juice drinks, pasta
Vitamin B6	biscuits, breakfast cereals, hot drinks, juice drinks
Folate	biscuits, bread, breakfast cereals, hot drinks, juice drinks
Vitamin B12	biscuits, bread, breakfast cereals, hot drinks, juice drinks, milk, pasta, yogurt
Pantothenic acid	breakfast cereals, hot drinks, juice drinks
Biotin	biscuits, bread, breakfast cereals, hot drinks, juice drinks, pasta, yoghurts
Vitamin C	biscuits, breakfast cereals, hot drinks, juice drinks, milk, confectionery
Vitamin D	biscuits, breakfast cereals, hot drinks, juice drinks, milk
Vitamin E	biscuits, breakfast cereals, hot drinks, juice drinks, milk, confectionery
Calcium	biscuits, bread, breakfast cereals, hot drinks, juice drinks, milk, yogurt
Magnesium	breakfast cereals, hot drinks, juice drinks
Iron	biscuits, bread, breakfast cereals, hot drinks, juice drinks, pasta
Zinc	biscuits, breakfast cereals, hot drinks, juice drinks
Iodine	biscuits, pasta

# CHECKOUT

## Loopy labels

Our regular roundup of the ridiculous and risible from our retailers

### Longer than a piece of string?

Our friends at SmithKline Beecham have been playing new games with their drink Lucozade Sport. *Keep Going 33% Longer*, they say. Which of course begs the question: longer than what?

- 33% longer than previous Lucozade Sport ?
- 33% longer than other sports drinks ?
- 33% longer than full strength fruit juice ?
- 33% longer than dilute fruit juice ?
- 33% longer than sweetened water ?
- 33% longer than a sugar lump ?
- 33% longer than a glass of water ?

The answer is the glass of water – and then if you are an 'athlete' says the company. What, then, is the sporting value of their latest drink – Low Calorie Lucozade Sport?



### Fruity claim

Kia-Ora has announced a wonderful improvement for their popular orange squash – a 20% increase in the fruit content.

Of course it all depends where you start from. In the case of Kia-Ora they started from around two percent (after dilution) and are now a tad nearer three percent.

This is about the same level as their added sugar – but don't get the idea that this product is not too sweet. It is very sweet. It boasts sugar *and* aspartame *and* saccharin.

Not to mention the unspecified flavourings, two thickening agents, two preservatives and two colouring agents.



### Choco-lle millennium

It'll soon be Christmas, AND it'll soon be the Millennium. So which event deserves an advent calendar?

The Millennium of course. Which brings us to the extra treat promoted on this pack, namely the wonderful slogan '32 days of chocolate!'



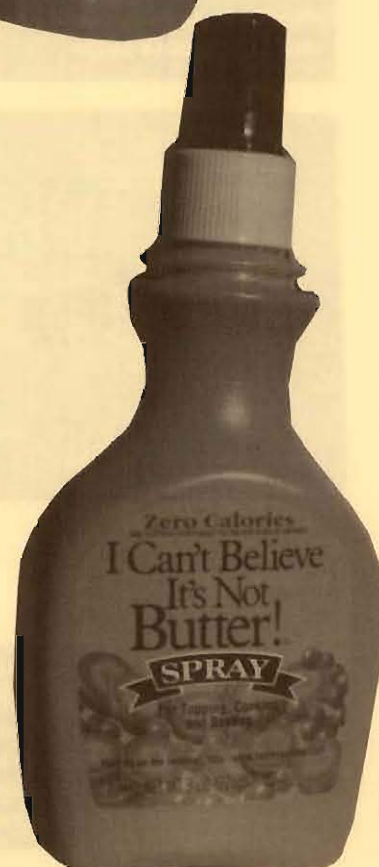
### Fat attack

From the land of the free comes a new variation on calorie-free fat.

Boasting zero calories, this product consists of water, soya oil, salt, buttermilk and eight additives.

In UK law that might mean there were calories in this product, but US labelling is based on calories per serving. One quick shot of this spray contains less than a quarter of a gram of the product, so the manufacturers claim that the calorie content is effectively nothing.

Meanwhile, who among us dares to believe that this technological marvel isn't butter?



# Nutrient fortification policy: the Australian experience

**Mark Lawrence examines the policy and politics of adding vitamins to food in Australia.**

**A**ustralians are fortunate to enjoy a food supply that is abundant, diverse, safe and relatively cheap. National surveys consistently reveal that the food supply contains more than adequate amounts of nutrients to satisfy the nutrient requirements of all Australians. There are few nutritional deficiencies, with the exception of the inequitable disease burden experienced by Aboriginal and Torres Strait Islander communities. Against this setting it might be asked why is there a need for a nutrient fortification policy in Australia?

In June 1995 the National Food Authority (NFA), as the Australia New Zealand Food Authority (ANZFA) was previously known, published its revised policy on nutrient fortification – Standard A9 of the Australian Food Standards Code. The decision making process associated with the development of this fundamental public health policy issue was complex, truncated and frequently adversarial. This article briefly outlines the more prominent aspects of the Australian experience in developing nutrient fortification policy to provide some insights into the decision making process. The issue of folate fortification of staple foods as an intervention to reduce the risk of neural tube defects (NTDs) emerged in the midst of the broader review of nutrient fortification policy. It is discussed in this article as a special case study.

## *Nutrient integrity*

In 1991 the NFA was established to promote uniform food regulations across Australia. The first task of the NFA was to complete all unfinished business inherited as a backlog of applications and proposals from the former food standards setting system within two years, including the revision of Standard A9.

When setting about its task to review nutrient fortification policy the NFA considered it was important that a set of scientific principles

be established on which the revision (and future revisions) could be based. The Authority adopted the Codex Alimentarius Commission's 'General Principles for the Addition of Essential Nutrients to Foods' as the original basis of the revision. These principles specify the following conditions for the addition of vitamins and minerals to foods:

- i) the restoration of vitamins and minerals to those levels found in foods prior to any processing
- ii) restoration to allow for nutritional equivalence of substitute foods eg the addition of vitamin A and D to margarine as a substitute for butter; and
- iii) fortification with additional vitamins and minerals where there is proven public health and nutrition need.

The NFA employed the Codex principles to capture in practical terms the concept of protecting the 'nutrient integrity' of food. The term nutrient integrity is used here in the context that historically different foods have had a characteristic nutrient profile. The indiscriminate addition of nutrients to a product alters its characteristic profile and has the potential to disturb the biological relationship between food and health. The cumulative and long-term consequences on public health and safety of nutrient manipulation are unknown. The assumption is that the best foundation for maintaining the appropriate spectrum and proportion of nutrients in the diet is to protect the nutrient integrity of the individual food products that make up the diet.

## *Nutrition vs commerce*

Whereas the Australian Consumers Association, the Dietitians Association and many public health practitioners supported the original NFA policy

proposal, certain food manufacturers argued that the policy provisions were idealistic and extreme. A particularly powerful coalition that lobbied against the original NFA policy proposal was the Australian Breakfast Cereal Industry Association (ABCIA) that was established and then managed by the multinational food company, Kellogg's.

During the review process the role of the NFA and its staff was subjected to intense scrutiny. At one stage questions of accountability regarding the role of nutritionists at the NFA were raised in the Australian parliament. A report prepared by an economics consulting firm for a working group of the Agri-Food Council (chaired by the Prime Minister) suggested that the Authority's public health and safety objective '...should be confined to health and safety in the strict meaning so as to exclude nutrition'.<sup>1</sup> According to the economists who prepared the report, in a food regulation context, nutrition considerations in public decisions are 'uneconomic' and an 'impediment to commercial interests'.

The National Food Standards Council, comprising the health ministers of the eight states and territories, to whom NFA recommendations were submitted for approval, rejected NFA's original policy proposal. Instead the Council advised the NFA to base the nutrient fortification policy on the principle of 'no-harm'. This was a definitive piece of advice. The burden of proof was placed on the regulator to demonstrate a risk to public health and safety rather than on the stakeholders seeking change to demonstrate a scientific need or benefit for adding nutrients to food products.

Following the Council's advice, the NFA modified its interpretation of the principles used as the scientific basis for its policy proposal to permit more liberal nutrient fortification. The Authority sought to maintain the Codex principles as far as practicable though the concept of protecting nutrient integrity was substantially eroded. The Food Standards Council then accepted the revised standard. The key features of the revised standard are that:

i) vitamins and minerals may be added at moderate levels to some basic foods provided the vitamin and mineral is present at a level of at least 5% of the recommended dietary intake (RDI) per reference quantity in the nutrient profile prior to processing.



## Folate claims: Health Minister over-ride public criticisms

ii) foods which historically have been fortified with a vitamin or mineral by a significant proportion of manufacturers, eg breakfast cereals, may continue to be fortified with those vitamins and minerals at moderate levels; and

iii) the criteria underpinning nutrient content claims were amended to create a disincentive to the unlimited or liberal amounts of some nutrients added to food products. A 'source' claim can be made for a listed nutrient at 10% of the scheduled RDI per reference quantity and a 'good source' claim at 25% of the RDI per reference quantity.

## Case study

During NFA's review of Standard A9, epidemiological evidence emerged indicating that folate supplements consumed by expectant mothers during the periconceptional period helped reduce the risk of NTDs. The development of policy recommendations in response to this epidemiological evidence was treated as a separate issue from the broader review of nutrient fortification and was the responsibility of the National Health and Medical Research Council (NHMRC).

The NFA raised several ethical, safety, efficacy and public health concerns related to uncertainties associated with folate fortification and the notion of implementing a population-wide intervention for the potential benefit of specific individuals. Nevertheless, the NFA accepted the NHMRC's policy recommendations to fortify staple foods with folate on a voluntary

basis at up to 50% RDI per reference quantity. These policy recommendations created a precedent for food fortification policy in Australia. The recommendations were predicated on delivering a nutrient 'dose' to individuals afflicted with a specific medical condition (affecting approximately 500 cases per year in Australia).

Effectively folate is not acting as a conventional nutrient, instead its role has become more therapeutic.

In November 1998 the Folate/Neural Tube Defect Health Claims Pilot was launched and for the first time a health (medicinal) claim on ANZFA approved products became legal. The circumstances surrounding the health claim approval were extraordinary. The Commonwealth Health Minister invoked emergency procedures to permit the health claim – effectively denying the normal public comment process. Many public health practitioners in Australia have questioned the motivation for the Minister's action and are concerned that this experience does not bode well for consultation on the broader health claims debate. Their concern is that the folate case is being exploited opportunistically to 'open the door' to other potentially less deserving claims and thereby compromise the folate policy and legitimise a general medicalisation of the food supply. This concern has been exacerbated by monitoring and evaluation developments. With limited resources ANZFA has been able to collect and report on the policy's implementation.<sup>7</sup> However, some food manufacturers have dismissed as irrelevant the evaluation of the folate Pilot – they argue the trial is about testing a health claims management framework that just happens to be using folate as the convenient test. Moreover, the review of health claims regulation is scheduled to commence before the completion of the evaluation of the folate Pilot.

## Impact on food regulations

The nutrient fortification policy experience has had significant repercussions on the Food Authority's personnel and culture. The immediate impact of the policy decision was the resignation of both the Authority's Executive Director who was also the Chair of the NFA Board and the

Consumer Representative on the NFA Board. A longer term effect has been the change in stakeholders' relationships with the Authority. Public health and consumer representatives who were strong supporters of the Authority now express concern that ANZFA has a 'close' relationship with food manufacturers that is to the detriment of public health. Conversely food manufacturers who previously criticised NFA now are publicly defending the Authority.

## Impact on the market

The majority of food manufacturers observe the provisions of Standard A9. However, an erosion of the concept of nutrient integrity has resulted in the spirit of the regulation being abused by some and several anomalies appearing in the marketplace in Australia. For example, the findings of the 1995-6 National Nutrition Survey indicate that the mean intake of vitamin C for Australian adults was 450% of the RDI – this estimate does not include the significant contribution to vitamin C intake from nutrient supplements and many fortified foods. Despite this profligate intake of vitamin C across the population, this nutrient is continuing to be added in large amounts to food products and marketed as providing nutritional benefits to the consumer.

## Impact on public health

It is too early to know the impact that the policy has had on public health. Unfortunately, once the flurry of activity associated with the policy development had subsided there were limited resources allocated for its subsequent evaluation.

## Lessons from the Australian experience

With the benefit of hindsight, it might be suggested that the NFA, to borrow from Sir Humphrey Appleby, was 'courageous' in pursuing its original policy position. The NFA assumed that their scientific argument and public health principles would be sufficient to carry their original policy position. However, the decision making process for this policy was set against a political climate characterised by deregulation,

economic rationalism and globalisation of trade. Strategically, stakeholders opposed to NFA's original policy proposal were more mobilised and had substantially more resources available at their disposal than those stakeholders who supported the NFA's original policy.

## The future

The influence of nutrient fortification policy on the nutrient composition of food and the subsequent nutrient intake of the population highlights its fundamental importance to public health. The Australian experience illustrates that policy on nutrient fortification is intimately linked with the values of decision-makers towards the role of public health and nutrition in a food regulation setting. For example, the policy profile will depend upon how the food regulation objective 'to protect public health and safety' is interpreted and applied. Conventional risk assessment procedures for safety evaluations may measure immediate and direct cause and effect relationships, but they are not amenable to more fundamental public health principles. From a public health perspective the evidence informing the decision-making process needs to be inclusive of the cumulative and long term consequences of policy and sensitive to social and environmental indicators.

The emergence of the concept of functional foods, and the associated demand by manufacturers to be permitted to make health claims, highlights the need for food regulators to have a rational nutrient fortification policy in place. The fortification of food products with novel levels of nutrients is being proposed as one potential form of functional foods. A policy based on public health principles will provide a secure foundation to ensure that regulators are positioned to effectively manage this issue and thereby protect public health.

### References

- <sup>1</sup> ACIL. Food for thought, A report to the Agri-Food Council Working Group on Regulatory Regimes. Canberra, 1993.
- <sup>2</sup> Lawrence M, Rutishauser I, Lewis J. An analysis of the introduction of folate-fortified food products into stores in Australia. *Aust J Nutr and Diet*, 1999; 56: 1, 15-21.

Mark Lawrence is a NHMRC Scholar at Deakin University, Melbourne and formerly a senior nutritionist with the Australia New Zealand Food Authority. Contact: malawren@deakin.edu.au

## Consumer groups oppose extension of health claims pilot

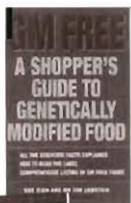
The Consumer Food Network of the Consumers Federation of Australia is opposing any extension to the Australia New Zealand Food Authority's (ANZFA) folate health claim pilot programme. It is calling on ANZFA to terminate the trial as originally planned, early next year, saying that the trial has been 'a misconceived exercise in futility from day one'.

Their reasons for opposing an extension are:

- 1) The folate/neural tube defect health claims pilot gives a false impression to women that they have to eat fortified breakfast cereals in order not to have a baby with spina bifida.
- 2) Only lip service has been given to the importance of a balanced diet of whole foods as a source of adequate folate intake. Only one in ten products that make a folate health claim has followed the agreed guidelines in relation to provision of information about the importance of a balanced diet.
- 3) Of the more than 100 products approved for the pilot by ANZFA, only ten have carried a health claim, and these have mostly been highly processed breakfast cereals. No fresh fruits, vegetables or dried legumes has carried the claim, confirming the Consumers' Federation view that the pilot was merely a promotion exercise for a few breakfast cereal manufacturers.
- 4) There was no community consultation about the pilot before it commenced.
- 5) There is no convincing justification for beneficial health effects of health claims.
- 6) Since few food companies have shown interest in applying the folate health claim, a proper evaluation of the management framework for health claims is impossible, yet this is supposed to be the objective of the pilot.

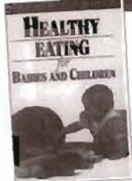
■ For more information contact Dick Copeman, Consumer Food Network, 223 Logan Road, Buranda QLD 4102, Australia. Fax: +61 7 3217 3028. Email: eco-cons@bit.net.au

# marketplace



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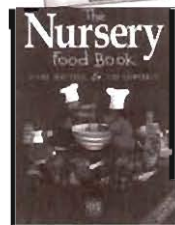
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## Americans 'drowning in sugar'

US consumer and health groups are urging their government to set maximum daily intake levels for added sugars in food, and to require food labels to display how much sugar is present in the product.

The moves follow increasing concern at the continuing obesity problems suffered by US citizens despite reductions in national average fat intakes over the last two decades. Sugar consumption in the USA has increased 28% since 1983 and is particularly high among younger age groups.

The Washington-based Centre for Science in the Public Interest (CSPI) has submitted a 60-page petition to the Food and Drug Administration pointing out that their reasons for not requiring sugar labelling in the early 1980s are no longer appropriate, and calling for strong food labelling measures to help consumers choose healthier products.

CSPI director Michael Jacobson says, 'Sugar consumption has been

*going through the roof, fueling soaring obesity rates and other health problems. It's vital that the FDA require labels that would enable consumers to monitor – and reduce – sugar intake.'*

Professor Marion Nestle of New York University supports the move, adding: 'Because sugary foods often replace more healthful foods, diets high in sugar are almost certainly contributing to osteoporosis, cancer and heart disease.'

Support is also given by Professor Mohammad Akhter, executive director of the American Public Health Association, who called for 'action to stem the dilution of the American diet with sugar's empty calories.'

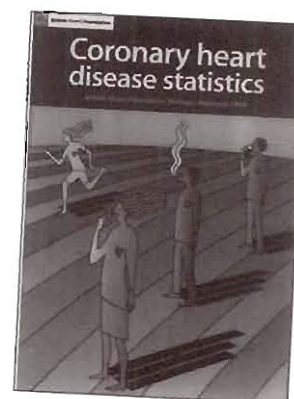
Nutrition survey data from the US Department of Agriculture shows mean intake of added sugars (discounting those found naturally in milk, juice, fruit etc) among the population to be 16% of total calories, but for a quarter of the

population (top quartile) added sugars account for 21% or more of calories and for 5% of the population they account for 32% or more of calories.

For children aged 12-19, the top quartile figure is 25% or more of calories from added sugars, and for the top 5% of children the figure is 37% or more of calories from added sugars.

The 1990 UK adult nutrition survey data show intake of total sugars to average 18% of calories for men and 19% of calories for women. The top 2.5% of men were consuming 840 calories in sugar every day, but their total calorie intake is not given. Obesity rates in the UK are rising despite decreases in average fat consumption, implying that sugar intake needs more attention in the UK as part of obesity prevention.

■ The CSPI petition and related material can be seen on <[www.cspinet.org](http://www.cspinet.org)>.



Stats-packed: Decreasing rates of heart disease deaths, increasing heart disease treatments, decreasing levels of fat consumption, increasing obesity levels... an increasingly valuable annual publication of UK and European statistics from the British Heart Foundation, price £9.99. Contact them on 0207 935 0185.

## Coca-Cola madness?

The outbreak of health complaints in schools in Belgium and northern France last June, which were initially attributed to the consumption of Coca-Cola, were subsequently described as 'mass sociogenic illness (MSI)' in the *Lancet* in July. Claims that the drink had a bad odour or that the packing materials were contaminated were dismissed as insufficient to explain the incidence of ill-health.

But a month later, the *Lancet* reported a further study showing that MSI was itself an insufficient explanation for the ill health. Comparisons of 112 cases and 164 controls (children in the same class) comparing consumption of Coca-Cola and likelihood of showing symptoms, found strong links between the drinks and ill health even after allowing for the general mental health of the children (as an indication of susceptibility to MSI). The authors say that additional medical, psychological and toxicological data is needed to identify a plausible explanation.

■ Outbreak of Coca-Cola-related illness in Belgium: a true association, F Van Loock *et al*, *Lancet*, 354, 681, August 21 1999.

## Codex proposes rules on health claims

Draft recommendations for the use of health claims on food products are being discussed by Codex, the world food standards body. Their proposals appear to be similar to those currently enacted under US legislation, which permit general health claims that are consistent with and support national public health policies.

Functional food claims would not be restricted to public health needs, but can be made for any product provided it can satisfy any scientific criteria demanded by national 'competent authorities' where the product is sold.

For either regular foods or functional foods, claims that a food or ingredient can reduce the risk of a disease can be made provided the national authorities recognise that the relationship is valid, or the relationship can be demonstrated using 'clear

scientific evidence'. In these cases the claim may not be made if other ingredients in the food might themselves increase the risk of a disease or health-related condition – the so-called 'anti-junk' clause.

Consumer groups are concerned that the proposals leave large loopholes which can be exploited by manufacturers. The anti-junk clause only applies to risk reduction claims, not other functional foods or foods making health claims. The definition of what might be junk is itself very weak, in that evidence would have to be produced showing that the consumption of an ingredient in a junk food would explicitly increase the risk of a disease, from the amount consumed. Thus soft drinks and confectionery might escape if the manufacturer can show that the product would not be consumed in

sufficient quantity or frequency to increase the risk of dental caries

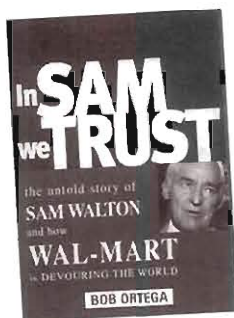
The notion of scientific substantiation for the legitimacy of claims may also be challenged, as the direct testing of functional ingredients is usually conducted only by the companies concerned in promoting the product. Examples of products such as olestra-containing crisps and phytosterol-containing margarine indicate that side effects, anti-nutritional effects and effects on vulnerable groups may be given insufficient attention in the rush to market products.

■ The Food Commission will be raising concerns about health claims at Codex meetings as a member of IACFO, the International Association of Consumer Food Organisations. Let us know your views.

## In Sam We Trust

The untold story of Sam Walton and how Wal-Mart is devouring the world. Bob Ortega, Kogan Page £12.99. ISBN 0 7494 3177 6

Wal-Mart's recent takeover of Asda has been heralded as a victory for consumers. We might not know much about the world's largest retailer, but with newspaper headlines screaming 'Rip-off Britain' and a government investigation into supermarket prices, what could be better than a hungry and powerful new rival



slashing prices and forcing every other retailer to do the same?

But according to author Bob Ortega of the Wall Street Journal, Wal-Mart is definitely NOT good for the consumer. Its low prices carry hidden costs, it devastates both the local retail scene and the environment with a strategy that Ortega sums up as 'a pattern of development that consumes the environment as though it too was disposable.' Ortega accuses Wal-Mart of intimidation of employees and exploitation of its market position. 'Wal-Mart has led the way in eliminating factory jobs in the US, mercilessly

pushing its suppliers to cut costs by moving their production of apparel, toys and other goods to the developing world, where wages are lower, labour laws are weaker, and sweatshops and child labour are the rule rather than the exception.'

Although Britain's land-use planning regulations are far tougher than in the US, Ortega quotes Clive Vaughan of Retail Intelligence as saying that the Blair government 'may well decide that the most effective way to lower the nation's grocery bill is to ease up on planning restrictions and allow some of these megastores (5 times the size of the average Asda store) to be built'. Ortega says the question isn't only about how much prices will really come down – but at what cost to the environment and

working conditions? He might also have added, what costs to the nation's health? Cheap food is often healthier food as manufacturers replace expensive quality ingredients with cheap substitutes, typically fat, sugar and salt. And for those on limited income, with no car, superstore savings are of little value. Yet as more and more local shops close, access to quality, affordable healthy food becomes more difficult.

Ortega hands over the campaign baton to us all. 'As has been the case in the US and elsewhere it will be up to British consumers and activists – up to you – to decide to what extent Wal-Mart's approach to retailing will be allowed to reshape their workplaces and neighbourhoods.'

## The Meat Business

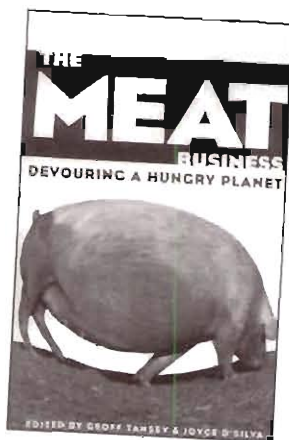
Devouring a hungry planet G Tansey and J D'Silva (Eds), Earthscan, 1 20 Pentonville Road, London N1 9JN, 1999, ISBN 1 85383 603 6, £12.99.

Conference reports are often a bit dusty and dated by the time they emerge into book format, but in this case we have an exception.

The campaigning organisation Compassion in World Farming organised a grand meeting on 'Agriculture for the New Millennium – Animal Welfare, Poverty and Globalisation' in the spring of 1998. The papers given at the time are remarkably apposite today, as many of them address the current moves towards free trade in agriculture and the WTO.

The basics are worth re-stating. Meat production is highly demanding of natural resources. It involves (usually) discomfort and distress to the animals being reared. And the consumption of meat contributes to human ill health – especially where meat displaces fruit and vegetable products in the diet.

Our modern forms of trading encourage the greatest production at lowest direct cost, i.e. the intensification of animal production – including the use of a range of techniques for boosting muscle growth (hormones, antibiotics, high-protein feedstuffs) and the selection of species types that grow largest and fastest (perhaps using gene



engineering). Although direct costs may be minimised under such intensive regimes, the indirect costs (to the environment, to human and animal health and well-being) are greatest in such systems.

Both the subsidised production systems of Europe and the proposed free trade models of the World Trade Organisation will continue to encourage intensive production of meat. The alternatives lie in developing the argument for the internalisation of the indirect costs (i.e. making the producers bear the full social costs) – which will favour sustainable, non-intensive production methods – along with the development of alternative markets by encouraging consumers to demand high levels of animal and human welfare and environmental protection.

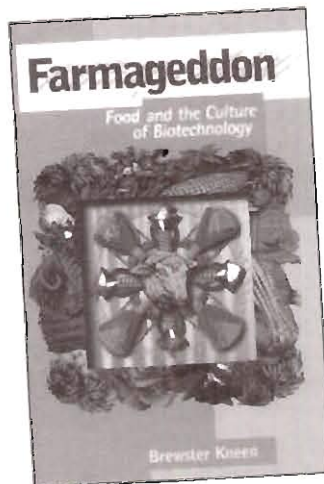
These issues are well-explored in this enjoyable, highly partisan book.

## Farmageddon

Food and the culture of biotechnology B Kneen, New Society Publishers, Canada (Distributed by Jon Carpenter Publishing, The Spindlove Centre, Charlebury, Oxon OX7 3PQ), 1999, ISBN 0 86571 394 4, £13.00.

In contrast to 'Consuming Interests' (see right) this book is written chattily and engrossingly, and has some great turns of phrase – not least in the word Farmageddon.

The content of the book is largely the observations of an experienced writer and campaigner in Canadian food policies. The author brings together his perceptions on the current big production issues around farming, food and biotechnology.



But it is the turn of phrase that makes the book so great. Here's a snatch:

*'I am frequently asked "are you against all biotechnology?". It is sometimes a question of disbelief that anyone could be just plain against "progress". Often the questioner is engaged in a quiet personal struggle against hopelessness and despair in the face of the dominant culture of determinism and individualism that drives the practice of biotechnology.*

*'In effect, my answer is Yes... not on any principle, but because, as an artefact of society, an expression of a particular culture, I think "modern biotechnology" is a bad attitude – a bad attitude towards life, towards Creation, towards other cultures and other ways of knowing and experiencing the world.'*

He tears in turn into 'hormonized milk', 'eternal tomatoes', 'killer potatoes', and how the legislation to regulate the technology has been 'made to order'. All good stuff with fine quotations from the companies' own mouths.

And he finishes with his own Lexicon of definitions. Try *Germplasm: The mystical foundation of life, subject to private ownership under the rules of capitalism.*

Or *Attention Deficit Syndrome: A disease of the biotech companies, which can only see as far as the next quarter. Results in bad science.*

Keep on writing but please keep your letters short!  
You can fax us on 020 7837 1141

## Consuming Interests

The social provision of foods  
T Marsden, A Flynn and M Harrison,  
UCL Press, 11 New Fetter Lane,  
London EC4P 4EE, 1999, ISBN 1  
857 28900 5, £16.99.

Social scientists often have trouble getting to grips with the relationship between human beings and the food they eat. All too often such academics have never had to draw up a shopping list let alone spend their Saturdays at Sainsburys. Worse, they lack a vision which sees the world in terms of its dominant market forces: the corruption of healthy diets, the promotion of profitable foods over healthy ones, the use of marketing tricks to capture sales and so forth — in brief the forces that protect or exploit public needs.

This book at least pays some respect to these issues. It could hardly fail to do so, as it is based on a series of interviews with key stakeholders in the battle for the hearts and minds of the public. The authors talked with a range of consumer and public interest groups, including the Food Commission, along with government and industry bodies.

The trouble with using interview material is that it tempts laziness. It is too easy to use selective parts of the material to support your ready-made theory, rather than allow the theory to emerge from an analysis of the material. The authors have a long history of analysing the power of retailers to control the market, so it



may not come as a surprise that their conclusions from their research reported here are that supermarkets play a pivotal role in mediating between consumers, government and producers.

And yet perhaps they are right. Certainly, it has been the supermarkets who have seen opportunities to respond to consumers interests and go beyond the requirements of the law — for example in improving nutrition labelling, or more recently in removing GM food products. A supermarket makes a move, not because it wants to please consumers but because it wants our custom, and to take our custom from its rivals. Public interest groups and environmental groups create a demand, supermarkets may or may not respond. They hold the power. Government regulation follows belatedly and weakly behind.

These are important conceptual arguments, and the book is valuable for that. But my, it is an odd mix of clarity and stodginess. The word 'bifurcated' is preferred to the word 'split', for example. And what are 'local retail-consumption spaces' or 'food provision spaces' if not shops and restaurants?

Hailes go further in identifying ingredients, and brandname products and assessing what's already on supermarket shelves and in the pipeline.

They predict that by 2010 there will be many more kinds of GM produce and processed foods on our shelves, the expansion of the organic sector will mean the watering down of standards, and that functional foods will need to prove their efficacy and safety more rigorously. They also predict the blurring of traditional boundaries towards GM functional foods and even predict that one day we might see GM organic. Whether they are right or not will largely depend on us, the consumer, and our willingness to accept or reject what companies seek to serve up to us.

## The New Foods Guide

John Elkington & Julia Hailes,  
published by Gollancz at the end of  
October. £6.99  
ISBN 0 575 06806 X

In their new book, Elkington and Hailes, the authors of the *Green Consumer Guide*, seek to assess the future for what they call new foods; namely genetically modified foods, functional foods and 'new' organic foods. It's the same approach adopted by market research consultants, Dragon, in their report (also called *New Foods*) published earlier this year, which identified these as major trends in food development. But Elkington and

## Letters

### Fortified junk

In your last issue you discussed how manufacturers love to add vitamins to products, but then asked is this what we want, fortified junk! My answer to that is No we do not.

Manufacturers need to educate people or at least let them know that fresh foods often have twice as much vitamins and goodness in them than the fortified alternatives. I carried out an experiment to test a fresh potato from the supermarket with a packet of potato powder that claimed to have added vitamin C. But as you can probably already guess the fresh potato had practically the same amount of vitamin C as the fortified version.

The problem is that not many people would know this and seen the label for added vitamin C and bought that one instead. Fresh vegetables do not have labels claiming that they are high in ascorbic acid.

Donna Reid, Hitchin, Herts.

I appreciate that foods contain a number of nutrients to ensure a longer shelf life of the product, such as vitamin C acting as an antioxidant preventing the fat in food going rancid.

However I am against the fact that manufacturers will fortify foods which contain no real nutritional goodness and then go on to promote this as a 'nutritious product' with the only nutritional goodness coming from the fortified ingredients added to the product.

This misleads the consumer into believing that the product is a healthy one, yet it will still be high in fat or lack nutritional value.

Manufacturers should state clearly on food labels the amount that fortified foods provide as a % compared with the fresh alternative, giving consumers a choice when purchasing foods. It would also be an idea to state the nutritional content of fresh foods to give the consumer the information needed when making a choice of which items to purchase.

E Tracey, Letchworth, Herts

### Milk needed

According to the Dept of Social Security, 32% of all British children are living in households at or below poverty level. These poor children suffer from food poverty which would be aggravated by abolishing the present scheme for subsidising milk for schoolchildren as discussed in your article *School milk for whom?*

Milk provides protein, vitamins A and D, polyunsaturated fatty acids, calcium, magnesium and other nutrients which contribute to child growth and development.

Arthur Wynn, Highgate, London

### GMs in vitamins and remedies

I am doing my best to avoid foods containing GMOs and thanks to supermarkets and manufacturers waking up their ideas a bit this has become easier (for the moment).

What does concern me is that very little has been said about vitamins and supplements and also medicines. I have noticed a lot of vitamins and medicines I take for granted contain various starches and binders and lecithins. Is there any legislation concerning GM ingredients and derivatives on these items currently?

A Hartley, Oakwood, Derby

*Food supplements and vitamins are treated as food products for food labelling purposes, so they should be labelling the same ingredients made from GMOs. At present, starches, oils, lecithin and other additives, and vitamin Bs (riboflavin) derived from GMOs do not need to be labelled on foods or supplements, but this may start to change (see page 4). — Eds.*

### Conference Oct 28th

The Role of Science in policy-making. Contact IPMS on 020 7902 6600

## Shredded claims

In our last issue we reported on the link-up between the British Heart Foundation and Nestlé's Shredded Wheat – and how the cereal packaging gives a strong impression that eating the product may help prevent heart disease.

Health claims such as these are in a grey area of the law. There is no explicit claim that the product will prevent or treat a disease – which would break the labelling regulations. But the impression given is tantamount to that, and could mislead the public – especially as the consumption of soluble fibre (e.g. from fruits and vegetables) is linked to reduced heart disease risk, rather than the consumption of insoluble fibre (e.g. wheat products). The issue is being taken to court by Shropshire Trading Standards officers as a test case on health claims.

The Shredded Wheat-BHF link-up is just the sort of thing that should be dealt with by the newly-formed Joint Health Claims Initiative, an alliance of industry, consumer and statutory bodies who will advise manufacturers on good and bad practices.



How ironic, then, that the membership of the Joint Health Claims Initiative steering group includes an executive from Nestlé, a food labelling expert part-funded by the British Heart Foundation, and a member of the Shropshire Trading Standards team.

The irony stretches further. Professor Brian Pentecost, an expert on the links between heart disease and diet, was quoted in June this year as saying that eating more fruit and vegetables 'can help reduce the risk of developing coronary heart disease because they contain antioxidants and soluble fibre' and that foods with health claims 'should undergo the same evaluation as new drugs.'

Professor Pentecost was until recently the medical director of the British Heart Foundation.

## Fat chance

The government's Food Advisory Committee (FAC) have expressly recommended that products should not carry 'X% fat free' claims as these can be highly misleading to consumers.

Their recommendation was made the month after our April issue of the *Food Magazine*, where we showed how ridiculous these claims are. But do the companies pay any attention?

No – we found over thirty products carrying 'X% fat free' claims in our nearest supermarket, including several newly launched this autumn. The worst companies were Jacobs (Danone), McVitie's and Sainsbury's.

What will the FAC do, faced with this flouting of their advice? They could start by pointing fingers across the table – at FAC member Neville Craddock, employee of Nestlé whose Shredded Wheat boasts 98% Fat Free – and at FAC member Barbara Saunders, 'freelance consumer consultant', who advises Sainsbury's (a dozen '% fat free' claims).

**90%  
Fat Free**

**95%  
FAT  
FREE**

## Eco-burgers

Environmentalists have long accused the burger chain McDonald's and its rivals Burger King as destroyers of the natural environment, to say nothing of the built environment where our streets are littered with cast-off wrappings.

How interesting to find that McDonald's is helping sponsor an environmental 'Thames wildlife' day of action in London. Volunteers will get 'free McDonald's food', plus a chance to win tickets to the London Aquarium, and the loan of protective clothing.

Protective clothing? It turns out that the event, which takes place along a stretch of the south bank of the Thames, will include many pleasant hours cleaning up the litter that lies along the river's shore. Exactly whose litter they do not say.

## Japan goes pear-shaped

A little known fact – plant specialists regularly use radiation and mutagenic chemicals to develop new plant varieties.

But you don't always need a laboratory. In July, the *Irish Times* reported on a mutation of a Japanese pear variety in an orchard adjacent to a nuclear reactor. A fungus struck the orchard and the crop was lost except for one tree near the reactor, which produced healthy fruit. It was found to have a radiation induced mutation which conferred resistance to the pathogen.

## MAFF Co. Ltd.

While some environmentalists are complaining that when they ask companies questions, they get phoned back by The Department of the Environment with answers, food campaigners find the reverse problem.

Suddenly conscious of the excessive salt that companies add to our diets, the Food and Drink

Federation, which represents the interests of food and drink manufacturers in the UK, has issued a press release saying they will review their members' products.

Copies of the FDP's press release are available from – guess where – MAFF's consumer helpline at MAFF HQ in London.

## Sticky sesame

Nestlé's launch of toddler snacks such as sesame sticks seems to be running into trouble.

Not only was their advertising campaign run several weeks before products were available in the shops (at least in north London).

And not only was their PR department unable to send copies of the packages or labels of the products to food writers who asked for them. But also their choice of products may backfire.

Carers of young children are advised not to give nuts or nut products to children as weaning foods, as this may trigger allergies. In Australia, sesame seeds are considered as the second most serious allergen after peanuts.

The Anaphylaxis Campaign is concerned that sesame products could endanger young lives. They have been working for years with food manufacturers to promote guidelines for good manufacturing practice – namely to avoid, wherever possible, the inclusion of major allergens as ingredients, especially for young children.

The campaign has worked closely on these guidelines with one company in particular. Nestlé.

