



To the attention of:

Ms. Stella Kyriakides

European Commissioner for Health and Food Safety

European Commission

Rue de la Loi 200

B – 1049 Brussels

Brussels and Paris, 5th December 2019

Dear Commissioner Kyriakides,

The undersigned organizations would like to hereby congratulate you for your appointment as the new European Commissioner for Health and Food Safety and we sincerely wish you significant achievements in the fulfilment of your mandate.

We welcome the commitment to the protection of consumers' health throughout Europe expressed during your hearing. With this letter, we would like to draw your attention to recent developments regarding the food additive E171, made of titanium dioxide (nano)particles, and call on your leadership to put citizens' health first in important decisions to be made about its regulation as your mandate starts.

EFSA's latest statement¹ on E171 acknowledges a number of uncertainties in relation to safety. Since then, additional scientific publications² have raised a red flag on potential risks related to the consumption of this food colorant, which serves no nutritional purpose or function other than changing the appearance of food put on the market. Furthermore, E171 is mainly used in food products which are particularly popular with by children, such as confectionery, cakes, desserts, ice cream, biscuits, chocolate bars, bakery and pastry products, etc., which raises concerns on the potential high exposure of this vulnerable population.

¹ EFSA statement on the review of the risks related to the exposure to the food additive titanium dioxide (E171) performed by the French Agency for Food, Environmental and Occupational Health and Safety (ANSES); EFSA Journal 2019; 17(6):5714. <https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2019.5714>

² Avicenn's list of recent academic publications on adverse effects of E171 and/or TiO2 nanoparticles via oral exposure available at <http://veillenanos.fr/wakka.php?wiki=RisQIngestionNpTiO2/download&file=20190911AvicennE171recentpublications.pdf>

Consequently, the French Government recently adopted a suspension of E171 in food products, to be effective on January 1st 2020. This precautionary measure was adopted to protect consumers' health based on recent studies reviewed by the French Agency for Food, Environmental and Occupational Health & Safety (ANSES) which identified possible carcinogenic impacts, among other adverse effects³.

We understand discussions are ongoing in the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) about the French measure. As previously indicated⁴, **the undersigned organizations strongly urge you, in your lead role of Commissioner for Health and Food Safety, and the Commission to uphold the precautionary principle by supporting the French ban on E171 in food products as well as its future extension to the rest of Europe.**

In this regard, we would like to highlight that in preparation for the entry into force of the French suspension, the vast majority of food manufacturers putting food on the French market have already abandoned the use of E171 without any difficulties or notable economic impacts⁵ through substitution or simply removal.

EU Institutions should respond positively to the over 84,000 citizens across Europe who have already signed a petition⁶ to support the French ban and the implementation of the precautionary principle in the presence of uncertainties in relation to food additives that serve no nutritional purpose and may present a risk for consumers.

We hope that we can count on you to publicly express your support on this issue which is important for protecting the health of all European consumers and to take decisive action. We would welcome the opportunity to meet you to further discuss this important issue and remain available for further questions that you might have on this topic.

Thank you very much for your time and attention,

Yours sincerely,

Agir pour l'Environnement
Center for International Environmental Law (CIEL)
European Environmental Citizens Organisation for Standardisation (ECOS)
European Environmental Bureau (EEB)
Foodwatch International
Health and Environment Alliance (HEAL)
Safe Food Advocacy Europe (SAFE)
Women Engage for a Common Future (WECF)

³ Scientific opinion of the French Agency for Food, Environmental and Occupational Health and Safety (ANSES) on the risks associated with ingestion of the food additive E171, available at <https://www.anses.fr/en/system/files/ERCA2019SA0036EN.pdf>

⁴https://www.beuc.eu/publications/beuc-x-2019-031_removal_of_e171_from_the_eu_list_of_permitted_food_additives.pdf (May 2019) ; <https://www.env-health.org/european-civil-society-groups-raise-questions-about-industry-funded-study-on-e171-toxicity-and-call-on-decision-makers-to-support-the-french-ban-on-unnecessary-food-additive/> (September 2019).

⁵ List of companies abandoning the use of E171 available at https://petition.agirpourenvironnement.org/wp-content/uploads/2019/12/In-France-companies-who-have-abandoned-E171_APE_3dec2019.pdf

⁶ Petition signed by EU consumers available at <https://you.wemove.eu/campaigns/support-the-french-ban-on-potentially-harmful-food-additive-e171>