IACM
International Association of Color Manufacturers

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January 21, 2025

RE: **House Study Bill 5 (OPPOSE) – Bans Safe Food Coloring in Schools**

Dear Members of the House Education Subcommittee:

The International Association of Color Manufacturers (IACM) respectfully opposes House Study Bill 5. We believe it is unnecessary and misguided.

IACM is the association representing the global color industry, comprised of manufacturers and end-users of natural and synthetic color additives that are used in foods, drugs, and cosmetics.

Colors are safely used as ingredients in consumer products, are among the most widely studied food ingredients, and are subject to strict global regulatory requirements. Color additives play an important role in food, and they do so without posing a health risk to children. **The U.S. Food and Drug Administration (FDA) and international regulatory bodies have all concluded that food dyes are safe for children and no study has offered compelling evidence that these colors cause adverse behaviors.**

FD&C Red No. 40

In the United States, all color additives must be approved for use before they can be used in food, drugs or cosmetics via submission of a Color Additive Petition.[1] The FDA regulates the safety and labeling of all color additives, and it does so based on scientific evidence. As such, the FDA has determined and continues to maintain that FD&C Red No. 40 is safe. FDA also monitors and evaluates any new available evidence on an on-going basis.

Other international expert bodies, including the European Food Safety Authority (EFSA), Health Canada,[2] and the FAO/WHO Joint Expert Committee (JECFA) on Food Additives[3] have conducted comprehensive risk assessments on FD&C Red No. 40 (known globally as Allura Red). They have all concluded that current evidence does not establish a causal relationship between consumption of the color and adverse behavior, including hyperactivity, and continue to maintain its safety.

In fact, Allura Red is one of the most widely used color additives, both in the U.S. and globally in North America, the European Union, Japan, and other regions, due in part to the extensive data supporting its safe use. In Europe, it is allowed in a wide variety of food and beverage categories, including beverages, lunch meats, processed cheese products, confectionary, savory snacks, flavored processed cheese, edible ice and flavored milk-based desserts.

[1] Color Additive Petitions | FDA
[2] List of Permitted Food Colours (Lists of Permitted Food Additives)
[3] 9789241210003-eng.pdf

JECFA, which consists of an international panel of highly respected scientific experts in toxicology, epidemiology, nutrition and other fields, agreed with EFSA and the FDA, concluding that **"dietary exposure for children and all other age groups does not present a health concern."** JECFA also noted its broad use, stating that it is permitted for use in a range of food categories in both the United States, the European Union, and in Australia and New Zealand. Allura Red is allowed in more than 50 food categories in the Codex Alimentarius General Standard for Food Additives.[4] JECFA serves as the risk assessment body for the FAO and WHO and the Codex GSFA is recognized by the World Trade Organization as the single authoritative reference point for food additives. It serves as a reference for developing countries and is intended to promote international harmonization for the use of food additives. Neither EFSA nor JECFA have raised any concerns for the use of Allura Red by children, and **no country or region restricts its use in school meals or other foods intended primarily for children.**

D&C Yellow No. 7

As part of the Color Additive Petition process, the FDA also approves colors for use in specific products based on the requested uses. As such, D&C Yellow No. 7 is restricted for use in drugs[5] and cosmetics.[6] I**t is not used in any food or beverage products in the United States, and it is not necessary for the state of Iowa to restrict its use in meals sold as part of a school's breakfast or lunch program.**

To conclude, food manufacturers must produce food for schools that meet strict nutritional standards as mandated by the US Department of Agriculture. According to the School Nutrition Association's 2025 School Nutrition Trends Survey, **costs to produce meals have risen substantially in recent years.**[7] Given the lack of scientific justification to support the proposed action, this bill is both unnecessary and will increase costs, with no benefit to the health and safety of Iowa's children.

IACM appreciates your consideration of the facts as outlined above and encourages you to engage further with the FDA and USDA on issues of food and ingredient safety. IACM also invites you to visit our public Color Library to learn more about FD&C Red No. 40 and other color additives that are used in the U.S. and globally.

IACM thanks you for your consideration of our comments and we urge you to oppose House Study Bill 5 for the reasons described above.

Sincerely,

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[4] GSFA Online Food Additive Details for Allura red AC
[5] 21 CFR 74.1707; available online
[6] 21 CFR 74.2707; available online
[7] SNA Survey Shows Mounting Costs for School Meal Programs – School Nutrition Association