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# ASSOCIATION OF FOOD AND DRUG OFFICIALS

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2019

## RESOLUTION NUMBER 2019-01

**Submitted by:** Erik Bungo

**Date:** July 9, 2018

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### **Concerning: Charcoal aka Activated Carbon Used as a Food or Beverage Ingredient**

**Whereas**, the culinary use of charcoal aka activated carbon is becoming increasingly popular as a food and beverage ingredient to color them black for an exotic, fashionable appearance, for an earthy, smoky taste, and for its supposed health benefits, which however are not proven, and

**Whereas**, public health and safety risks may be associated with non-food grade charcoal or activated carbon when consumed frequently over time as an ingredient in food or beverage products, and

**Whereas**, according to 21 CFR Part 184, Direct Food Substances Affirmed as Generally Recognized as Safe, charcoal and activated carbon is not specifically mentioned as a generally recognized as safe (GRAS) direct human food ingredient, and

**Whereas**, the source of the activated charcoal may be unknown and may contain heavy metals or residual plastics, and

**Whereas**, although consuming activated charcoal may seem like a harmless food/health trend, there are several reasons consumers should avoid these products:

1. Activated charcoal will bind with all kinds of things including some of the vitamins, minerals, and antioxidants in your food and could lead to nutrient deficiency through lack of absorption.
2. Activated charcoal can bind with some medications, including some antidepressants and anti-inflammatory medications, causing them to be less effective. Over time, this could have serious health consequences for some people, but it's not explained on menus, on bottles or packaging where activated charcoal and food products containing activated charcoal are being sold.
3. Activated charcoal slows down your bowel, absorbs water from the gut, which can lead to dehydration and is known to cause nausea and constipation (and black stools), and

**Whereas**, the history of food and drug law illustrates the critical need for federal oversight through technical assistance to the states, guidance to manufacturers, information to consumers, and, where necessary, national legislation, therefore be it

**Resolved**, that AFDO ask FDA to examine current industry use of activated charcoal in retail to determine if it is compatible with the requirements of FDA Model Food Code and, if use is not prohibited, identify appropriate controls to ensure consumer safety, and

**Be it further Resolved,** that AFDO advises FDA of the need for federal leadership on the matter of activated charcoal used as food or beverage ingredients and for providing guidance and technical assistance to the states on appropriate regulatory intervention in order to avoid the creation of a patchwork of state regulations covering this issue.