FoodDrinkEurope's views on the Food Additives Re-evaluation programme

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Contents

- Background
- Reasons for data collection
- FoodDrinkEurope's organisation
  - Strategy on data collection
- Lessons from Batch 1 and Batch 2 data collections
- Exposure assessment
- Conclusions

Background

- The Commission's ad hoc group on food additives (May 2008):
  - representatives of the European Commission, EFSA, JECFA
  - several member states
  - FoodDrinkEurope

- Conclusions:
  - necessary to identify additive usage levels most likely to make a significant contribution to intake
  - food industry could focus on collecting data that was of greatest relevance to risk assessment and risk management

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What is Required to Achieve Realistic Exposure Assessments?

- Food consumption data
  - Should be tested and validated for purpose
- Use levels
  - With an understanding of the amount of additives added at the time of manufacture and the actual amount of additives still present in the product as consumed
  - Should take account of complete range of exposure values
- Occurrence
  - Including occurrence (food effectively containing the additive/food in which the additive is authorised)

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What is Required to Achieve Realistic Exposure Assessments?

- Modelling methods
  - Should be transparent and versatile
- Overall approach
  - Should take all uncertainties into consideration and avoid ‘cumulative conservatism’
- Include Uncertainty Analysis

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FoodDrinkEurope's Organisation

- **National federations (26, including 3 observers)**
  - E.g.: FDF (UK), ANIA (FR), BLL (DE), Federalimentare (IT) etc.
  - Observers: Norway (NHO),Turkey (TGDF) and BFU (Baltic Food Union)
- **EU level sector associations (25)**
  - E.g.: Breakfast cereals (CEEREAL), Chocolate, Biscuits and Confectionary (CAOBISCO), Spirit drinks (SpiritsEurope), Dairy products (EDA), Snacks (ESA), Soft drinks (UNESDA), etc.
- **Large companies (17)**
  - E.g.: Agrokor, Coca-Cola, Cargill, Danone, General Mills, Heineken, Kellogg, Mars, Nestlé, PepsiCo, Ülker, Unilever, etc.

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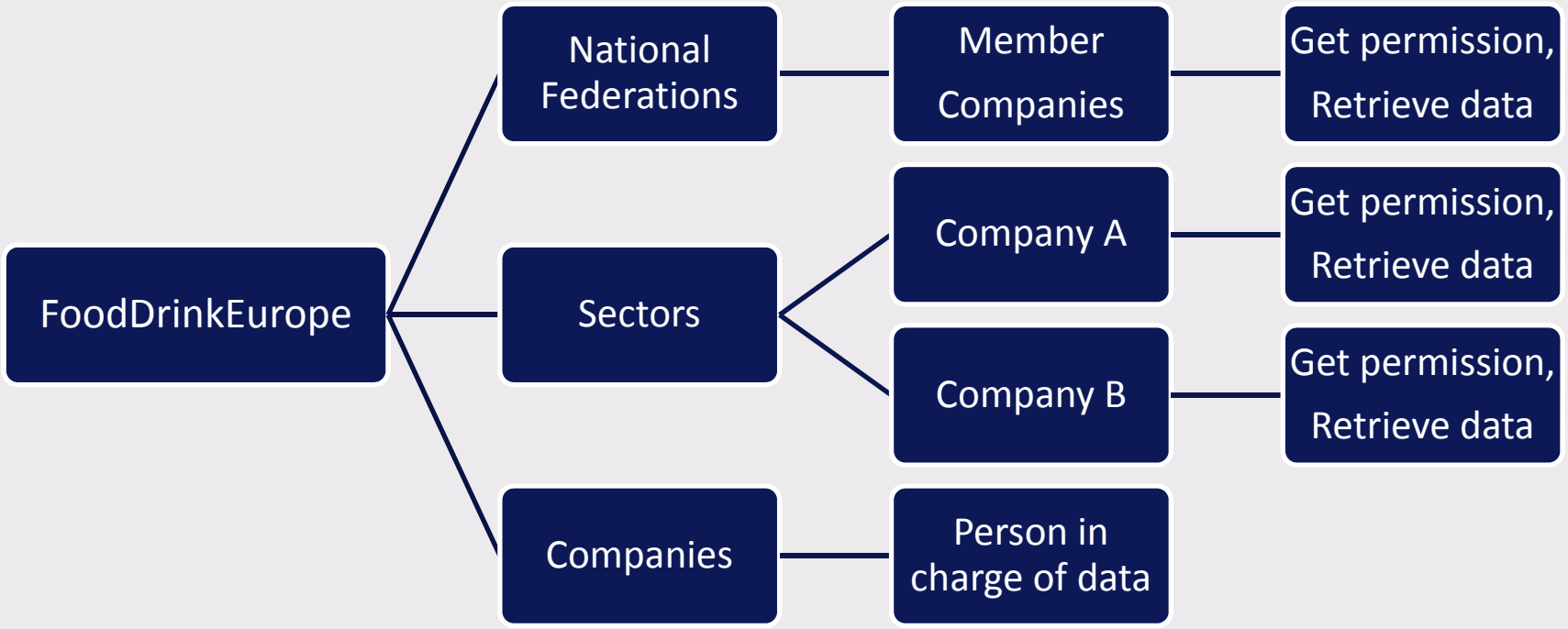
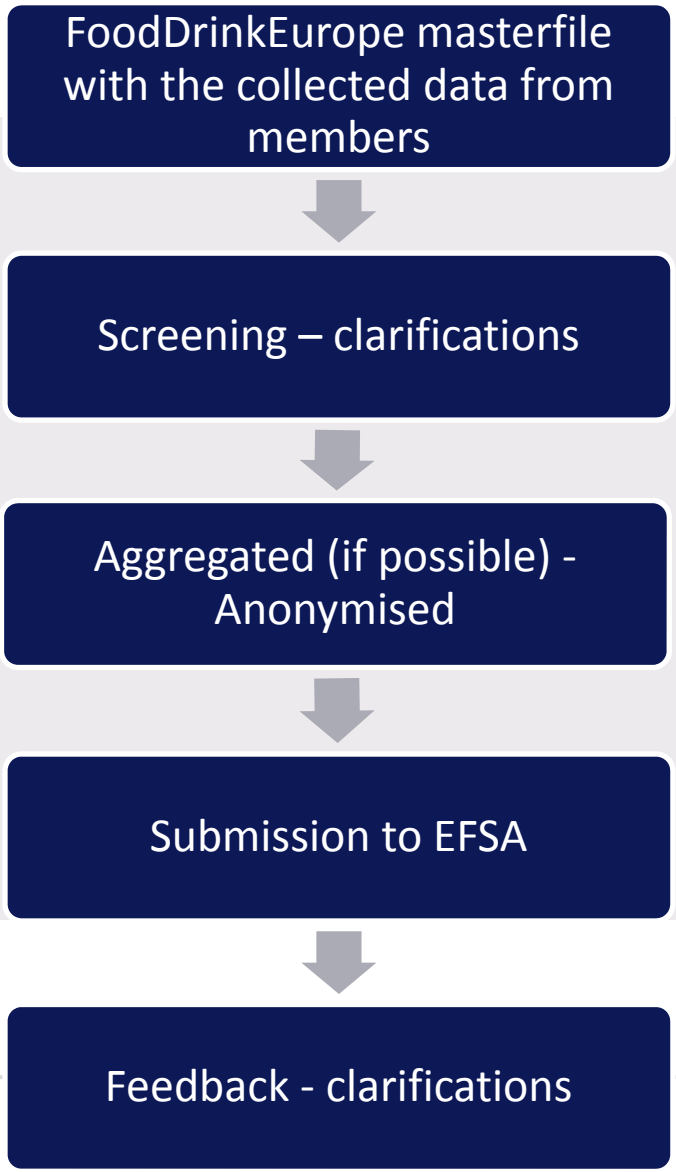
Response to Data Collection calls



Response to Data Collection calls



Lessons from Batch 1 and Batch 2 data collections

- Requires huge effort from the food industry
- Involves a lot of people
- Pragmatic deadlines are needed
- No changes once the call is announced
- Work programme: 1call per year with a reasonable deadline to plan the resources in advance

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Lessons from Batch 1 and Batch 2 data collections - Templates

- Practical problems:
  - Difficulties encountered for members to open and use the two spread sheets - Issues of firewalls and other security devices that prevented macros from running

- Appropriateness of the template:
  - Template was not developed for usage level additive data collection
  - Country of reporting
  - Some sub-categories are missing
  - Development of a common language: e.g. definition of representative grades

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Lessons from Batch 1 and Batch 2 data collections

- Batch 3 template was improved:
  - Open one spread sheet
  - Fields automatically filled in
  - Drop down list: EU countries first and alphabetically ordered
  - **Incorporate the legislation into the main spread sheet**

- Clarifications:
  - Active principle or whole additive, e.g. colours, gums
  - Carry over
  - Additives part of mixtures

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Batch 1 contribution

Records	Additive	E number
58	Curcumin	E 100
22	Azorubine/Carmoisine	E 122
25	Allura Red AC	E 129
3	Indigotine, Indigo carmine	E 132
1	Brown HT	E 155
17	Chlorophylls	E 140 (i)
5	Chlorophyllins	E 140 (ii)
18	Copper complexes of chlorophylls	E 141 (i)
26	Copper complexes of chlorophyllins	E 141 (ii)
12	β-Apo-8'-carotenal	E 160e
37	Titanium dioxide	E 171
11	Iron oxides and hydroxides	E 172

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Batch 2 contribution

Records	Additive	E number
18	Quinoline yellow	E 104
39	Sunset Yellow	E 110
84	Cochineal, Carminic acid, Carmines	E 120
19	Ponceau 4R	E 124
6	Brilliant black BN	E 151
47	Annatto, bixin, norbixin	E160b
13	Sulphur dioxide	E 220
9	Sodium sulphite[a]	E 221
6	Sodium bisulphite[a]	E 222
29	Sodium metabisulphite[a]	E 223
7	Potassium metabisulphite[a]	E 224
6	Calcium sulphite[a]	E 226
6	Calcium bisulphite[a]	E 227
6	Potassium bisulphite[a]	E 228
6	Potassium nitrite[b]	E 249
3	Sodium nitrate[c]	E 251

Records	Additive	E number
7	Potassium nitrate[c]	E 252
293	Ascorbic acid	E 300
31	Sodium ascorbate[d]	E 301
2	Calcium ascorbate[d]	E 302
56	Ascorbyl palmitate[3]	E 304i
1	Ascorbyl stearate[3]	E 304ii
38	Tocopherol-rich extract	E 306
96	α - tocopherol	E 307
2	γ- tocopherol	E 308
2	δ - tocopherol	E 309
86	Glycerol	E 422
13	Sucrose acetate isobutyrate	E 444
6	Polyglycerol esters of fatty acids	E 475
6	Sorbitan monostearate	E 491
2	Sorbitan tristearate	E 492

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Exposure assessment

- Realistic exposure assessment
  - FAIM categorisation system is too broad
- Refinement leads to a more realistic exposure assessment
- Occurrence data are not taken into account
- Currently a deterministic approach is followed
  - Use of only the maximum reported levels/permitted levels
- Probabilistic approach – avoid worst case scenario

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Exposure assessment: FACET tool

- FACET is an FP 7 project led by Joint Research Centre (JRC):
  - develop tools to better estimate additive exposure, to prevent risk assessors to constantly use worst case scenarios for exposure assessment
  - Centralised & harmonised database on food intake suitably categorised for food chemical exposures
  - Validated probabilistic methods and associated software programme for estimation of target food chemicals

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Conclusions

- Collection of good quality data and exposure assessments are an essential component of a reliable risk assessment
- Food industry can make important contribution to meaningful and complete data collection
- Addressing uncertainty and variability is essential, this should however not lead to the use of worst case scenarios being the basis for exposure assessment
- Practical solutions are required, training of personnel dealing with data collection
- Significant challenges remain

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Thank you for your attention!

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