AD HOC MEETING WITH THE INDUSTRY ASSOCIATION AMFEP

‘Enzymes – clarification on assessment of toxicological studies cf. new guidelines’

18th October 2017

Food Ingredients and Packing Unit (FIP)

Food Enzyme Team

efsa
European Food Safety Authority

AGENDA

Time	Items
09:00 09:15	1. Welcome by the Team Leader of Food Ingredients and Packing Unit (FIP) Tour de table
09:15 10:00	1. Relevance of new EFSA guidances in food enzymes assessment: a) the biological relevance of data b) the use of the weight of evidence approach
10:00 10:15	Coffee break
10:15 11:00	1. Assessment of toxicological data for food enzymes a) Transparency and consistency of the assessment process b) Use of dose descriptor and terminology
11.00 11.45	4. Q&A process between EFSA and applicants during dossier evaluations
11:45 12:00	5. Closing remarks and summary

LIST OF PARTICIPANTS

Industry Association **AMFEP - Association of Manufacturers and Formulators of Enzyme Products**	
Novozymes	Birgitte T. Ravn
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Novozymes	Dorthe Helnov
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European Commission	
	Jiri Sochor (via TC)
European Food Safety Authority	
FIP Unit, Team leader, toxicologist	Annamaria Rossi
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SCER Unit, Scientific officer	Bernard Bottex
SCER Unit, Scientific officer	Nikolaos Georgiadis
CEF Panel members	
	Karl-Heinz Engel (via TC)
FIP Food Enzymes Working Group	
	Andy Smith (via TC)
	André Penninks
Apologies	
Head of Food Ingredients and Packing Unit (FIP)	Claudia Roncancio Peña
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➢ Q&A PROCESS BETWEEN EFSA AND APPLICANTS DURING DOSSIER EVALUATIONS
HOW TO IMPROVE CLARITY ON ACCEPTANCE/CONCLUSIONS OF PROVIDED INFORMATION?

- **TECHNICAL PART:**
  - Certificates of analysis with all composition/chemical/microbial parameters, including for the batch(es) used for toxicological testing
  - Detailed information on AA sequence (e.g. number of AA, MW, absence/presence of signal peptide)
  - Clear LODs of applied methods for all chemical/microbiological parameters
  - Information on the raw materials actually used in the manufacturing process including antifoams clearly identified with CAS or any other identification number
  - Representativeness of the batches
- **MANUFACTURING PROCESSES:**
  - Detailed description of each step (e.g. techniques and equipment actually used in the recovery process)

➢ Q&A PROCESS BETWEEN EFSA AND APPLICANTS DURING DOSSIER EVALUATIONS

HOW TO IMPROVE CLARITY ON ACCEPTANCE/CONCLUSIONS OF PROVIDED INFORMATION?

MOLECULAR IDENTIFICATION:

- **Verifying the microbial strain** (Certificate of deposit and taxonomic identification with valid methods)
- **Verifying genetic modifications** (affecting the stability, yield, localization of the modifications, etc.)
- **Verifying absence of viable cells** and **absence of the recombinant DNA**, and avoidance of **Antibiotic resistance gene markers (Validate methodologies)**
- **Toxicological studies from predecessor strains in same lineage**
  - A. Documented between microbial strains development
  - B. Comparison of the food enzymes, the manufacturing process and raw materials used
  - C. Toxicity risk assessment data
- **Pathogenicity test**: Only in few cases it will be requested, for example when microbial source is a presumed pathogen or when toxic concerns could be also presupposed.

TOXICOLOGICAL DATA:

- Information about historical control data should be presented in the study reports
- Correct calculation of the doses in the toxicological studies (TOS must be clear)

ALLERGENICITY:

- Missing information about amino acid sequence
- Provide updated literature regarding allergenicity after oral exposure

EXPOSURE ASSESSMENT:

- cooperation in 2nd and other calls for data

- Information about intended uses
- Clear description of a technological need for an enzyme in a specific use

➢ WHAT COULD APPLICANTS DO TO FACILITATE EFSA'S EVALUATION AND CONCLUSIONS?

➢ In order to facilitate and speed EFSA's evaluation, applicants could:

- Provide transparent and complete information when data is requested. In case the information is considered not relevant to give clear argumentation for not providing it.
- Prepare clear dossiers, without repeated and sometimes contradictory information.
- Include all relevant data according to guidance, in the first submission of the dossier.
- Provide additional information requested timely, if available, and complete.
- Improve the dossier quality by providing answers to basic requests: e.g. certificates of analysis, historical positive control data in toxicological studies, strain deposition number, etc. Is it possible? Any hurdles?
- EFSA requests additional information in writing via a letter, the additional information specified shall be submitted by applicant as one package answering all questions. In accordance with the Decision of EFSA's Executive Director concerning the electronic submission of applications for regulated products, entered into force on 10/09/2014, it can be submitted in the form of 1 electronic copy only (using a standard physical medium, i.e. CD-ROM, DVD, USB key), together with a hard copy of the signed cover letter. The paper form of the submission, in addition to the electronic form, is still accepted but the electronic copy will be considered as the formal submission.
- When replying to EFSA requests for technical questions, be aware of the possibility to request "clarification teleconference" by applicants to EFSA, e.g. TOS calculation, dose calculation, etc. (EFSA Catalogue of services).

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