Integration of New Approach Methodologies (NAMs) in food safety risk assessment

APRIL 2023

IN BRIEF
The food industry believes that the use of NAMs in the context of a scientific risk-based safety assessment provides a more relevant and informative way of assessing the safety of food ingredients, instead of unnecessary animal testing.

Therefore, the food industry calls for integrating NAMs routinely into scientific and regulatory risk assessments, specifically in the European context.

KEY MESSAGES
- Application of NAMs can improve the relevance of data available for food safety assessment whilst avoiding unnecessary animal use
- The adoption of NAMs aligns with growing political and societal demands to phase out animal testing
- The use of NAMs has a legal basis under current EU regulations
- There needs to be more consistency in the use of NAMs in food safety risk assessment

Link to position paper

➢ Other industry associations have indicated their interest to co-sign: EU SFI, AMFEP, EFFA → a joint position paper will be published shortly
THE WHY:

i) Application of NAMs can improve the quality of data available for food safety assessment and avoid unnecessary animal use
   - mechanistic underpinning of toxicological events
   - better science tailored to address safety risk assessment questions

ii) Political and societal calls to phase out animal testing
   - strong interest from European consumers to sop animal testing e.g. recent European Citizens initiative (ECI)
   - vegan foods – certification bodies (e.g. EVU) all have a requirement for no animal testing
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THE HOW: current EU regulatory framework supports the use of NAMs
- legal obligation in EU to replace, refine, and reduce the use of animals for scientific purposes (Directive 2010/63/EU).
- European Parliament adopted a plan (2021/2784(RSP)) ‘to accelerate the transition to innovation without the use of animals’
- EFSA’s 2027 strategy – supports development and integration of NAM-based methods
- EFSA defined a roadmap for action on NAMs in risk assessment,
- EFSA has several pilots currently in place for the use of NAMs to fill gaps in risk assessment (EFSA, 2023).
- October 2022, the EU Intergroup on animal welfare emphasised to MEPs that it is now time we moved away from using animals in laboratory testing.

However:
- EFSA scientific guidance e.g. flavourings, smoke flavours – Increased requirement for animal testing and no flexibility for adoption of alternative approaches such as NAMs

The food industry would like the EFSA guidance documents on the safety assessment of food ingredients to reflect the new science and provide flexibility for the use of NAMs.
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THE WHAT: FoodDrinkEurope Position

1. Need to close the gap between modern safety science and regulatory requirements:
   - More flexibility to use fit for purpose NAMs within regulatory framework
   - Avoid mandatory outdated reliance on animal studies

2. Innovation requires the right regulatory setting and a NAMs approach is important for innovation in the food industry.
   - NAMs quickly provide more informative and high-quality data, avoiding unnecessary animal use, facilitating innovation
   - Examples can be drawn from other domains using more targeted approaches for risk assessment

3. The food industry welcomes partnership with the broad base of stakeholders.
   - Stakeholder partnership (academia, industry and regulatory authorities) to progress adoption of NAMs
   - Opportunity to feedback on latest guidances and pilots launched for integrating NAMs in risk assessment