STAKEHOLDERS DISCUSSION GROUP ON FOOD CHEMICAL OCCURRENCE DATA

10th Meeting

14 June 2023
09:00-13:00
Minutes agreed on 31 July 2023

Location: Online via MS Teams

Attendees:

- **Discussion Group Members:**

Organisation	Name
CAOBISCO	Eleonora Alquati
Cefic, the European Chemical Industry Council	Miguel Angel Prieto Arranz
ECF	Giovanni Lamberti
EU Specialty Food Ingredients	Clara Colonna attended instead of Petr Mensik and Maryse Herve
EUPPA - European Potato Processors' Association	Alessandro Piccione
EUROMALT aisbl	Gianluca Nurra
European Dairy Association	Maria Libertini
FEDIOL, EU vegetable oil and protein meal association	Despoina Angeliki Stavropoulou
FoodDrinkEurope	Alejandro Rodarte, Luca Terzi
ICGA-Europe	Christophe Leprêtre
ILSI Europe	Neil Buck
Specialised Nutrition Europe (SNE)	Evangelia Mavromichali, Karin Kraehenbuehl, Kata Hejjas
Spirit Europe	Mario Gregori
TIC Council	Nicola Colombo
UNESDA Soft Drinks Europe	Patrice Commarmond

- **European Commission:**
  Frans Verstraete, Katleen Baert, Ivana Poustkova
- **EFSA:**
  IDATA Unit: Giuseppe Triacchini (Chair), Fabrizio Abbinante (IDATA HoU); Sofia Ioannidou (IDATA DGO Team Leader), Guido Zunino (IDATA DMA Team Leader), Alexios Zormpas, Valentina Bocca, Anastasia Livaniou, Ashraf Khosravi, Vaia Mitoula, Krystalia Niforou

  MESE Unit: Petra Gergelova

  FIP Unit: Katharina Volk, Alexandra Tard, Blanka Halamoda

  TS Unit: Eileen O'Dea

  ENREL Unit: Luisa Abrahamyan Adilkhanyan

  RAL Unit: Ana Lambergar

1. Welcome, apologies for absence and adoption of the agenda

The Chair welcomed the participants.
Apologies were received from Petr Mensik and Maryse Herve (EU Specialty Food Ingredients), Arnaud Bouxin (FEFAC), Patrick Coppens (Food Supplements Europe) and Fabienne Zeugin (NATURAL FOOD COLOURS ASSOCIATION - NATCOL aisbl), Mihai Ionita (AESGP), Céline Benini and Dorthe Helnov (AMFEP), Claire Mary (EUPPA), Julia Faure (European Dairy Association), Thomas Gude (ILSI Europe), Farshad La-Rostami and Cordelia Kraft (Tea & Herbal Infusions Europe – THIE), Sue O'Hagan (UNESDA Soft Drinks Europe).

The agenda was adopted without changes.

2. Importance of industry data for EFSA

With this introductory point it was pointed out the importance for industry to be informed about the changes and updates regarding the different data collections and also the significance for EFSA to maintain an active communication and collaboration with industry representatives.
It was indicated that Chemical Monitoring Network members are submitting data to EFSA on an annual basis, nevertheless, for different domains such as contaminants, food additives, food enzymes, and food contact materials the contribution of industry is very significant and valuable.
Received data are used in the ongoing scientific opinions and will be retained in the EFSA Scientific Data Warehouse (DWH) for possible future scientific assessment in support of risk management. Therefore, all data you can share with us is important and can eventually become useful for different scientific assessments and risk management measures.
Therefore, this group will be the active channel for discussions, updates and where you can ask support, find answers to possible questions and even actively communicate and support each other.

3. Food additives re-evaluation programme: updates on work programme - current and future calls for data

The work programme for the food additives and flavourings was described.
The task with the high priority this year is related to the smoke flavourings renewal for which the deadline is end September. There are 8 opinions for which the work is done in parallel. Terms of Reference foresee a 2 steps approach. If there is no genotoxicity concern, a second opinion will follow with full risk assessment.
Many applications related to new additives and flavourings or changes in specifications or uses of some already in the market, are received and the work is on-going in the WGs of the FAF team.
Work on follow-up opinions and re-evaluation opinions is also in progress and 6 opinions could be adopted by the end of the year.

Concerning calls for data, one is live on the website, related to analytical data. A second one should be published soon and will ask for technical information, toxicity and dietary exposure data.
The coming work on the monitoring of food additives and flavourings done at the EC with MSs and help from EFSA was mentioned.
Finally, it was indicated that the current EFSA panels mandate will end next year and from July 2024 will start new Panels with a 5-years mandate.

4. Updates on the Food Contact Materials Data Collection

An overview was provided on the mandate regarding the risk assessment of phthalates, structurally similar substances and replacement substances potentially used as plasticisers in materials and articles intended to come into contact with food. The mandate is divided into two parts:

- Part 1: preparatory work containing 3 tasks:

Identifying and prioritising substances – the work already completed, the scientific opinion has been published,

Protocol development – protocols for the exposure assessment and the hazard assessment protocol have been published,

Establishing a call for data and literature search – 2 ongoing calls for data, the outcome of the literature review has also been published.

– Part 2: risk assessment(s) (scope of mandate still to be defined)

Aspects related to the ongoing calls for data were presented in more detail:

- **Submission of data as part of 2023 chemical monitoring data collection:**

Information on the call for data and the collection of FCM data in the ChemMon2023 data collection, under the chemical contaminants' domain, was given. All resources have been updated and are available online. The importance of distinguishing between "the matrix of the sample taken (SSD2 element E.02-sampMathCode) and "the analysed matrix (SSD2 element G.01-anMathCode) was emphasized.

- **2nd call for migration data: call for data providers' interest:**

Vaia Mitoula (EFSA) further presented the ad-hoc dedicated data collection on migration and concentration of plasticisers in FCM data, that will take place also in 2023. Information on the published call for data and the supporting material for reporting (with reporting season: May-August 2023), overview of the data model as well as the reporting tools were presented.

5. Update on recent and current uses of Food additives and Chemical Contaminants data

An overview on the recent and currently ongoing EFSA scientific outputs for which the occurrence data submitted by the Stakeholders was given. In particular, the focus was given to the outputs dealing with the food contaminants and food additives. A list of examples of the recent and ongoing outputs was shown to demonstrate an important contribution of the data received from the Stakeholders. In addition, the information about the forthcoming collection of data on botanicals was shared. It was shortly anticipated how practically the data collection of botanicals is planned to be performed specifying that a simplified Excel file in under the preparation and the deadline for the collection will be communicated in due time.

6. Chemical contaminants-ChemMon2023 data collection & priority substances

The main topics presented covered the call for collection of chemical contaminants occurrence data, the priority substances that were identified as priority for this year, and Chemical Monitoring 2023 reporting changes and updates relevant to contaminants. Considering that this year new Stakeholders joined the Network, Alexios Zormpas presented in a nutshell some practical information regarding the preparation and transmission of data, the available reporting tools, supporting materials published in Zenodo and all the links necessary for the validation and confirmation of transmitted data. Last point of this presentation was the timelines for Chemical Monitoring data collections for this year.

7. Issues of data submission to EFSA reported to DG SANTE – challenges for decision makers

Frans Verstraete gave a presentation on issues reported to SANTE related to data submission and the challenges from both Member States' side as well as SANTE being the risk managers.

As regards contaminants in food, it was mentioned that the Commission Implementing Regulation (EU) 2022/932 of last year set the formal legal obligation of Member States to submit the data to the European Food Safety Authority from the controls in implementation of the control plans.

Outside the remit of control plans, it was mentioned that the transmission of data, by Member States and other Stakeholders, is not a formal obligation but recommended in Commission Recommendations or in the Standing Committee Plants, Animals, Food and Feed section Toxicological Safety of the Food Chain. In general, occurrence data from research projects, national surveys etc. are effectively submitted to EFSA, and there is a good coverage of the data which is stored in EFSA's Scientific Data Warehouse (DWH).

Frans specified that regarding occurrence data for feed, the situation is less positive, as there is no specific EU control legislation neither a formal legal

requirement for the submission of this data to EFSA. Although there are Member States that submit feed data to EFSA, nevertheless, there is high variability per Member State.

On an ad-hoc basis, through the relevant working group on undesirable substances in feed and the Standing Committee Plants, Animals, Food and Feed, section Animal Nutrition, SANTE requests Member States to submit data on undesirable substances in feed. However, Member States highlighted that there is high burden of submitting the data to the FSA data warehouse (DWH).

Regarding Stakeholders, it was mentioned that there is a high amount of available data from monitoring / auto control in both food and feed domain. However, most of this data is not submitted to EFSA regardless the efforts of the Authority to simplify the process of the data transmission. The main identified reasons for the Stakeholders not submitting the data include burden of submission, and often not all mandatory fields are completed, therefore, datasets are rejected after initial transmission. Many data are obtained making use of screening tools which result to semi quantitative results instead of quantitative results and these data are not accepted in the EFSA DWH following a quality check. Lastly, Stakeholders might not submit data to EFSA due to confidentiality claims.

For EFSA risk assessment only validated occurrence data submitted to EFSA DWH are used. This is in principle also the case for EC risk management. However, during the discussion on regulatory measures additional occurrence data are provided by the Stakeholders to the Commission to take them into account during these discussions. The total number of data submitted in this way, is for certain contaminant feed/food combinations sometimes much larger than the data available in the EFSA DWH and provides sometimes a completely different contamination pattern than what could be concluded from the data available in the EFSA DWH. The problem is that these data are not stored in a database and are not publicly accessible, which is not contributing to transparent decision making. The non-submission of occurrence data for certain contaminants food/feed, is resulting in low availability of occurrence data for certain contaminant feed/food combinations not providing a representative picture of the real contamination pattern which consequently creates significant uncertainties in EFSA exposure assessments and subsequently in the risk characterization. The importance was stressed to have all the available non-submitted and rejected data because not all mandatory fields were completed and the quantitative occurrence data obtained by screening methods in a separate database as this could complete the "picture" and confirm or not the observed contamination pattern for a certain contaminant feed/food combination based on the validated occurrence data in the EFSA DWH and reduce consequently significantly the uncertainties related to those exposure estimates.

8. The EFSA Rebuild Data Framework project - have your say at the survey on the future process for data collection

EFSA initiated the Rebuild DF project that concerns the evolution of the current data collection and data warehouse platforms to satisfy the EFSA 2027 strategy needs. The objectives are the creation of new scalable data collection and analysis systems, the data management system to empower users and provide the tools to enable all above. An analysis phase is currently on-going, and a survey has been launched recently addressed to all EFSA stakeholders involved in data collections.

9. Discussion on issues reported to SANTE and to EFSA, and on Rebuild D.F

This presentation summarised the results from the survey shared previously with the Stakeholders. The survey rated the experience of Stakeholders sending data to EFSA but also covered other aspects such as rating the complexity of the standard sample description data model, the usability of control terminologies and related Catalogues, preparation of xml files and linked issues, DCF and understanding of business rules.

10. The FoodEx2 classification system and the smart coding app

The discussion aimed to provide theoretical and practical support to participants in reporting data to EFSA according to the FoodEx2 classification system, to provide guidance for its harmonized use and to promote best practice on the use of the EFSA FoodEx2 Smart Coding Application. The group was introduced to the background of the FoodEx2 system and its purpose. FoodEx2 enables occurrence to be combined with food consumption data to calculate dietary exposure, an important step of the risk assessment process. The FoodEx2 browser was also presented in detail. Emphasis was given to the different hierarchies hosted in FoodEx2 such as the reporting (suitable for coding occurrence data) and the exposure hierarchies (used for coding consumption data). Food groups and facets of the FoodEx2 catalogue together with their use were also presented. The rationale to codify foods with FoodEx2 and the three main types of terms regarding how foods are described in FoodEx2 (e.g., raw primary commodities, derivates of raw commodities and composite foods) were discussed. Examples on the application of FoodEx2 coding and the case of dealing with missing foods (e.g. quinoa flour, a food that is not present in the FoodEx2 list) were briefly discussed. Finally, the EFSA FoodEx2 Smart Coding Application (SCA) was presented. It aims to simplify the coding process through making use of artificial intelligence (AI) techniques capable of suggesting a series of complex FoodEx2 terms (combination of base term and facets) starting from the food description inserted by the user. Details on how to use the FoodEx2 SCA's home page such as the different web components (e.g., food

description, base terms and facets, overview, FoodEx2 code), were also provided.

11. Update on the activities of the Advisory Group on Data (possible future solutions to reduce data sharing pain-points)

EFSA presented the current status of activities of the Advisory Group on Data. This is a group of Member State representatives who lead the prioritisation and funding of activities which will enhance data sharing and data quality throughout the EU Food Safety Community. Current projects were described which are being led by Member States to identify pain points in the data sharing process and to collaborate in developing technology tools that can help solve the issues identified.

12. Final questions and discussion – AOB

It was reiterated the need to support the members with more available material. This transfer of knowledge could be in the form of pre-recorded videos, based on Data Providers' needs. In addition, as indicated by Angeliki Stavropoulou (FEDIOL), if they would have to choose, they would prefer live training sessions. However, it was pointed out, the participants would have to come with specific requests and pain points to be addressed in such a live session.

From EFSA's side it was indicated that both ways to support Industry members should be considered since from the one side, during the live sessions the interaction is more direct, however, the recorded material is a convenient way to capture and transfer the knowledge to new members who might need to be involved, in a later stage, in data transmission.

Chair, in line with Eileen's presentation, pointed out EFSA's aim and current activities to simplify the process of data transfer and enhance data sharing and quality. In addition, Eileen mentioned that considering the current projects that EFSA is working on, once the methodologies on the tools are described in the requirements and the methodology description is finalized, EFSA is open to share those with members. In case there is such interest and/or if members would consider this information helpful in revising or improving their data management processes in sharing data with EFSA we are happy to collaborate with you.

Christophe Leprêtre (ICGA-Europe) shared a question regards the recently published EC recommendation for a monitoring program of food additives and flavourings. More specifically, Christophe asked how the European Commission (EC) intends to organize with the EU Member States the preparation of the preliminary priority list(s) and how this was linked to EFSA's current considerations and conclusions on dietary exposure assessments.

Katleen Baert replied that EC developed a methodology for the monitoring of food additives and food flavourings. This is a provision which is included in the food additive Regulation and the food flavouring regulation so the Regulation (EC) No 1333/2008 and Regulation (EC) No 1334/2008, in which Member States

are requested to monitor the use and the consumption of additives and flavourings and to do this by using an risk-based approach. With this recommendation EC have put forward such a methodology and for the actual categorization and the prioritisation, which is described in the annex of the recommendation, EC has asked EFSA to collect information that can be used for doing this categorization and prioritization by developing databases that contain the information such as value of the ADI, the percentage of the ADI etc. EC sent a mandate to EFSA specifying that the data that will be collected by the member states will be submitted to EFSA, so that this data will become available for risk assessment and for risk management purposes. EFSA was also requested to calculate the dietary exposure which is foreseen by the provisions of the two regulations that exposure has to be monitored and we have asked this to EFSA so that also there would be a harmonized methodology applied in line also with EFSA's guidance documents to avoid that different member states which use different approaches, and it would become also difficult to compare their exposures.

Specialised Nutrition Europe (SNE) shared a concern on analytics. Analytical methods must be available, reliable, and applicable in order to produce accurate occurrence data – which are essential for accurate exposure assessments and risk characterization. Very often, official analytical methods are missing or are not appropriate for complex finished product matrices, such as foods for infants and young children. This is a limitation for reporting data to EFSA, as the datasets might not be homogeneous when there are no standardized analytical procedures, and as a consequence the available occurrence data for specialised nutrition products in the EFSA DWH will not be sufficient for a proper assessment. Moreover, some mandatory data requirements of the SSD2 reporting are not always applicable for the specialised nutrition sector, and therefore members are hesitant/discouraged to share data with EFSA.

End of the meeting