Record of the views expressed at the

5th Meeting of the EFSA Stakeholder Discussion Group on Food Chemical Occurrence Data

Held on 20/03/2018, Brussels (Belgium)

Participants

- **Chair:** Doreen Dolores Russell (EFSA)
- **Members of the Discussion Group**

Organisation	Name
AESGP – Association of the European Self-Medication Industry	Gaelle Jouvenceau
BEUC - The European Consumer Organisation	Gemma Trigueros
CAOBISCO – Association Chocolate, Biscuits & Confectionary of Europe	Julie Gisewski
CEFIC – European Chemical Industry Council	Cedric Delveaux & Miguel Angel Prieto Arranz
EU Speciality Food Ingredients	Petr Mensik & Joy Hardinge
ESA – European Snacks Association	Marta de la Cera
FEDIOL - The EU Vegetable Oil and Proteinmeal Industry	Julie Roïz
FDE - FoodDrinkEurope	Angeliki Vlachou
FSE - Food Supplements Europe	Patrick Coppens
ICGA – International Chewing Gum Association	Manon Ombredane
EDA – European Dairy Association	Maria Libertini
NATCOL – The Natural Food Colours Association	Valerie Rayner
SNE - Specialised Nutrition Europe	Evangelia Mavromichali
UNESDA - Union of European Soft Drinks Association	Helen Benson/Stefan Ronsmans

- **Apologies**

Beate Kettlitz (FoodDrinkEurope), Chris Bruyninckx (formerly UNESDA) Christophe Leprêtre (ICGA), Aaron O'Sullivan (SNE), Bettina Breuer (SpiritsEuorpe).

- **Observers from the European Commission**

Frans Verstraete , Andreia Alvarez-Porto, Guillermo Cardon and Milada Schulzova – European Commission DG Health and Food Safety (SANTE), Unit E2 (Food Processing Technologies and Novel Foods).

- **Other observers**:

Patrick Fox (Association of Manufacturers and Formulators of Enzyme Products).

- **Representatives of the European Food Safety Authority**

Doreen Dolores Russell Evidence Management (DATA Unit, Jane Richardson (DATA Unit), Alexandra Tard (FIP Unit) Goran Kumric (ENCO Unit).

1. Welcome

The Chair, Doreen Dolores Russell (EFSA DATA Unit), welcomed all the participants and the Commission representatives to the 5th meeting of the EFSA Stakeholder Discussion Group on Food Chemical Occurrence Data.

2. Adoption of agenda

The agenda was agreed and the programme for the day outlined together with an overview of the main topics to be discussed.

3. Topics for discussion

3.1 Renewal of the Discussion Group on Food Chemical Occurrence Data: Next steps in light of new stakeholder engagement approach

Goran KUMRIC presented the EFSA stakeholder engagement approach (SEA). SEA is in alignment with EFSA Strategy 2010 – Trusted Science for safe food and is linked to transparency and engagement in risk assessment (TERA). SEA is now in the implementation phase and offers equal opportunities for stakeholders to provide input to EFSA. There are currently 107 registered stakeholders and the registration process is still open and the discussion group on food chemical occurrence data is a part of the SEA. The Stakeholders Forum is open to all stakeholders and topics discussed are based on stakeholder inputs and the recommendations from the Stakeholder Forum feed into the Stakeholder Bureau discussions. Round tables are an additional engagement mechanism available to industry and NGOs (non-governmental organisations) while information sessions are arranged for consultations on specific scientific topics. A stakeholder newsletter is published periodically providing information on SEA events.

The objectives and deliverables for the discussion group on food chemical occurrence data were presented for discussion. The renewal of the membership of this group provides an opportunity to ensure a balanced mix of viewpoints and the timeline for renewal of membership applications should be completed by the 8 November 2018. There are alternative mechanisms for engagement for non-selected organisations with targeted platforms including Roundtables, information sessions and the Communicators' Lab.

EFSA highlighted that registration for the Stakeholders Forum is still open for those that are not already registered. FDE asked about merging of the EFSA panels and whether flavourings would be part of this discussion group. EFSA indicated that the remit of the group could be extended to other chemicals e.g. flavourings and enzymes and possibly a short survey could be used to gather input. FSE asked about analytical methods and how validation and differences in analytical methods should be discussed for specific chemicals, and how stakeholders could give input. EFSA replied that this matter is discussed with the DATA scientific networks, the EURLs (European Union Reference Laboratories) are also involved. FEDIOL supported a wider scope for the discussion group for example more emphasis on contaminants and discussion with the European Commission's JRC (Joint Research Centre) on analytical methods and laboratory methods. UNESDA highlighted the reliability of laboratory methods as important for all data. FDE asked about the application of quality criteria for data and issues with naturally occurring substances from MSs (Member States) monitoring programmes and on this point EFSA advised that MS laboratories have to be accredited. Furthermore, FDE requested a clarification concerning use levels provided for a specific food category; in particular, whether use level values are attributed to the umbrella category or linked only to the consumption of the specific subcategory. EFSA replied that if no other levels are submitted the levels from the subcategories are attributed to the umbrella category.

3.2 Open data and data publication initiatives

Jane Richardson presented background to the open data initiative and latest developments in opening EFSA data in accordance with strategic objective 2 of the EFSA Strategy 2020. She described that EFSA data are now available through initiatives such as OpenFoodTox – EFSA's chemical hazards database, EFSA's Knowledge Junction https://zenodo.org/communities/efsa-kj?page=1&size=20 a curated, open repository for the exchange of evidence and supporting materials used in food and feed safety risk assessments on the EU-funded Zenodo research sharing platform, and the EFSA data publication working group (which aims to reach a consensus on data publication) https://ess.efsa.europa.eu/doi/doiweb/wg/683771.

In the discussion that followed CEFIC asked if the data shared is a copy-paste format from opinions. EFSA replied that the EFSA journal is a primary source and the EFSA journal data is usable at the end of the process while Knowledge Junction should be used at the beginning rather than the end of the process. CEFIC also asked if the publication of industry data was also included in the open data initiatives. EFSA replied that not at present but the current review of the EFSA Founding Regulation (Regulation (EC) 178/2002) could change this. FSE asked if any criteria are applied for data to be uploaded in Zenodo; EFSA confirmed that there are but that the curation checks are carried out at point of use. BEUC asked if data is available on the VMPR (Veterinary Medicinal Products Residues) page displayed during the presentation as it is good to have checks. EFSA clarified that the raw data in not available in the Zenodo platform.

3.3 Data feedback and updates

EFSA presented an open discussion on some matters identified with respect to duplicate data submission and clarification requests. Updates were given for calls for data (food additives/infant formula contaminants), additive usage survey results and next steps, forthcoming initiatives – the development of a MRL/MPL (Maximum Residue Levels/Maximum Permitted Levels) tool, the EFSA Scientific Data Warehouse and the training webinar in 2018 on completing the additive usage template.

EFSA reported that the call for contaminant and food additive occurrence data is published with the data collection opening on 15 May 2018. EU Speciality Food Ingredients asked which additives are included in the call. EFSA indicated analytical data on occurrence of sweeteners can be submitted via the DCF (Data Collection Framework) from that date but that all additives data from analytical results can be reported- not just those additives in the Batch 7 call - until the 1 October 2018. The ongoing contaminants mandates were presented to the meeting. Future requests to EFSA might include aflatoxins, nitrates and nitrites in feed/food and brominated flame retardants. The EC (European Commission) clarified that nitrates and nitrites in food are required for monitoring purposes and in feed for a new risk assessment. FDE asked about risk management actions for nitrates and nitrites as food additives to which the EC explained that reduction options are being explored and that authorised levels of nitrates and nitrites as food additives are under revision.

EFSA informed the Discussion Group that a new request for uses of food additives in the food category 13.1 (food for infants and young children) would be launched to address data gaps identified in already published opinions. The list of additives with known data gaps was presented. The EC emphasised that this will be the final opportunity to provide data on use levels of the listed substances allowing EFSA to conclude its assessments, in order to address the outstanding data gaps and enable the EC to put in place risk management

actions (e.g. removal from the Union list in case of no data) if needed. EU Speciality Food Ingredients asked whether the call will include requests for data which are generally requested by the EC on their website, such as data on the lowest achievable limits for heavy metals. The EC explained that a final list for a new call specifically for additives will be defined and will also be published on the EC website. In the context of this discussion, EFSA highlighted that the call for sweeteners is already published on EFSA's website (Batch 7).

EFSA raised the issue of duplicate reporting and asked how the associations can help to resolve this issue. FSE indicated that duplicate reporting is also a problem for industry associations. FDE advised that they instruct data providers to use a single channel of data reporting, one Excel sheet/file for industry organisation and subsequently FDE manages and anonymises the identifier. ESA explained that data from producers of ingredients and data from manufacturers of the final products containing the ingredients should be separate and this may address some issues of duplications. FEDIOL advised that some associations are able to act as single points for data collation and reporting to EFSA. ESA indicated that the additive food categories can be confusing and can lead to hidden duplication. EFSA indicated the unique identifier is critical to identifying duplicates. UUID (universal unique identifier) generators could be a possible solution but the length of the codes would require adjustments to the reporting template. EFSA will investigate the feasibility of adapting the reporting template to facilitate this.

EFSA advised that timely responses to clarification requests are crucial and that the data reliability statement sent to data providers must be confirmed. NATCOL highlighted that additive food categories are also an issue for the associations. EFSA presented the results of the additives survey which indicated that the reporting template could be improved. A webinar for training on completing the additive usage template is planned for 2018. EFSA also clarified that publication of additive occurrence data is part of the data publication working group. FEDIOL asked about the MRL tool and indicated that they would be interested to have access to this tool.

3.4 The 2018 prospective food additive re-evaluation programme and the Food Additive Intake Model

EFSA presented the re-evaluation programme which was due to be completed by 2020 and the changes to the EFSA panel structure. The 2018 work plan envisages the adoption of 26 opinions with a particular focus on phosphates. Sweeteners will be assessed once the call for data is closed and are due to be completed by 2020. Sixty-eight food additives will be outstanding for re-evaluation post 2020.

UNESDA asked about the representativeness of analytical data and whether the methods used are validated: and how to discriminate between additives and naturally occurring substances. In addition clarity was sought on the setting of Group ADIs (Acceptable Daily Intakes). EFSA explained that selection of the highest levels includes employing expert judgement and that industry use levels are generally used and take precedence however when there is no use level data available other data (analytical data) is used. Additionally there are data gaps in some countries. EFSA asked if use level totals can be provided across different classes e.g. additive and nutrient sources. SNE clarified that the interest is on the additive function. The EC added that for infant formulas there is a need to be compliant with maximum levels in the product as consumed. The infant formula Directives list authorised substances with a minimum and maximum in terms of energy requirements, and manufacturers should be aware of the levels of a substance independent of its purpose. The global exposure and fate in food need to be considered in the assessment. BEUC indicated that consumers wish for all quality data to be used for exposure assessment considering the total diet. EFSA indicated that for phosphates and similar substances the analytical data is used with use levels to determine the contribution of the additives to total exposure. In this respect EFSA requires data for single chemical entities and the group ADI is often driven by the availability of toxicological data.

3.5 Any other business – closure of meeting

The Chair thanked all the participants for their input and contributions. She advised that the presentations would be sent the discussion group in the coming days while the minutes would be shared with the group for their comments prior to publication on the EFSA website. She also encouraged the meeting participants to register as stakeholders for this group. She also suggested that a presentation on the EFSA flavourings evaluation programme could be a topic for this group at the next meeting.

4. Dedicated training on completion of the food additive usage template

Hands on training on data reporting using the food additive usage template commenced after lunch. Data providers and interested parties undertook the training and also proposed and discussed some improvements to the reporting template. These include possible changes to reporting variables and compatibility with different computer operating environments. EFSA will consider how to best implement the requested updates.

The meeting closed at 16:30 as anticipated in the agenda.