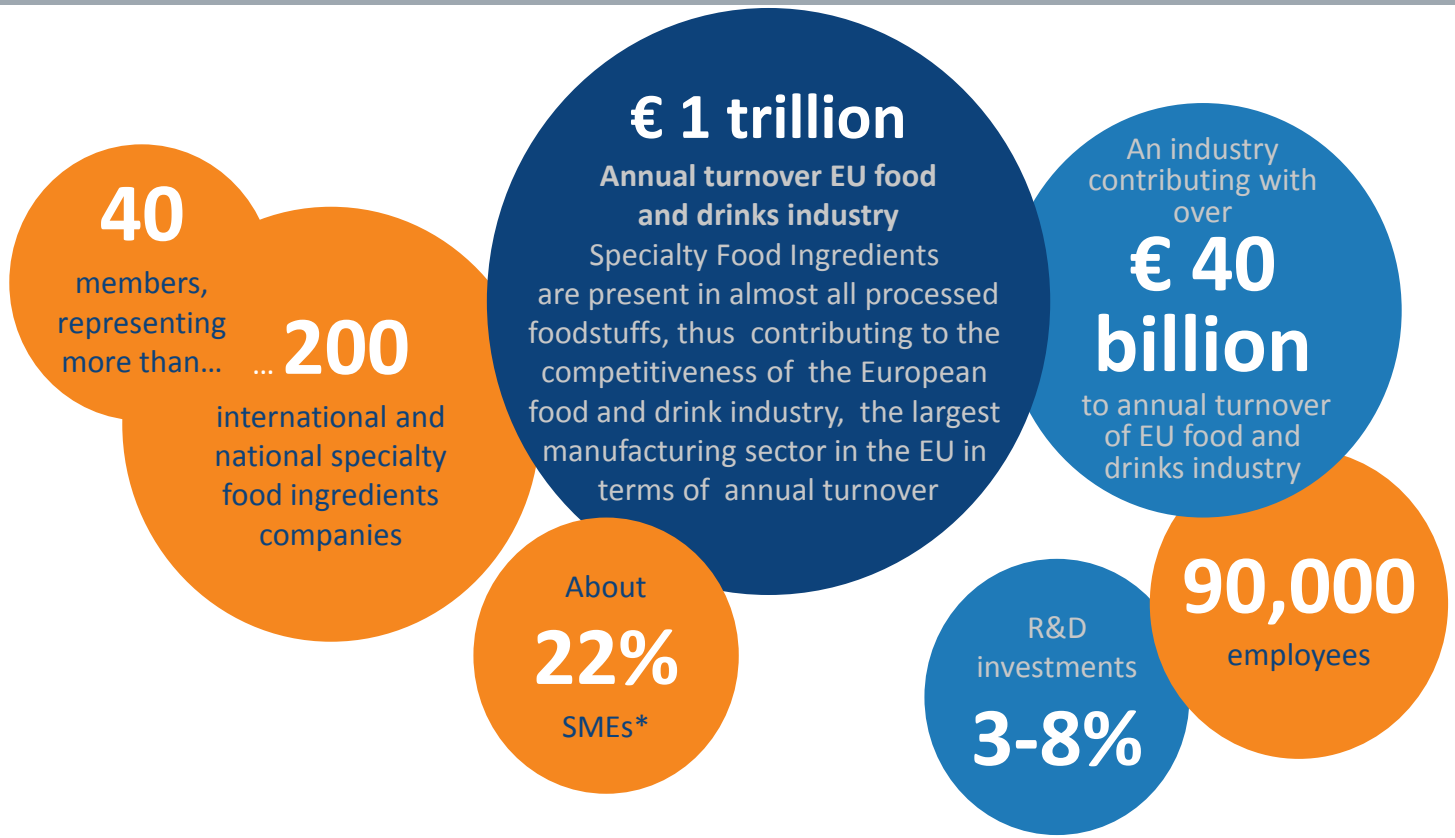
EU specialty food ingredients

Re-evaluation of food additives Engagement with EFSA

EFSA Round Table with industry associations, 13 June 2018, Brussels

is the association of Europe's leading specialty food ingredients manufacturers



* < 250 employees and TO < € 50 m.

These are guesstimates 2013, based on internal data gathering amongst our diverse membership (CEFIC is a member of EU Specialty Food Ingredients but is excluded from calculations due to unclear representation of industrial chemicals vs specialty food ingredients).

EU specialty food ingredients

Membership

More than 200 companies represented directly or indirectly

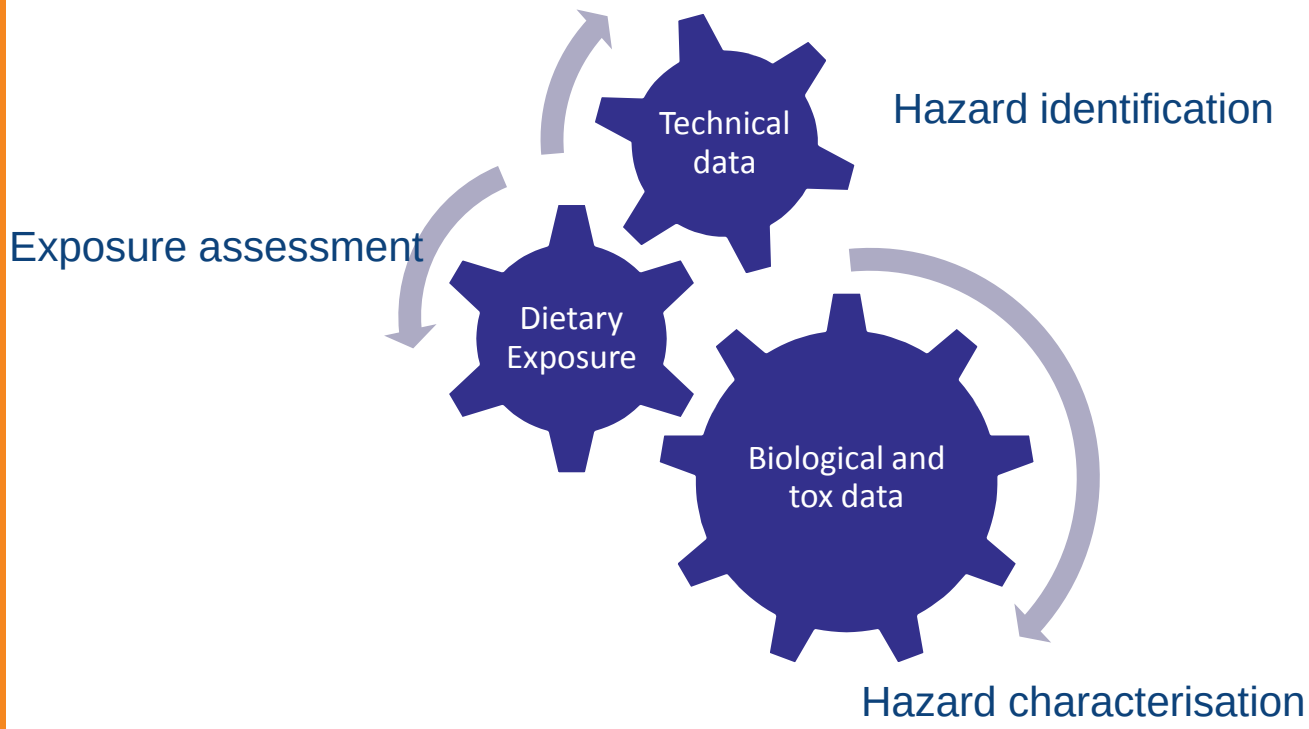
What are specialty food ingredients? What are they good for?

Specialty food ingredients offer technological and/or functional benefits: they typically **preserve, texture, emulsify, color and improve the nutritional profile** of processed food

- ✓ Contribute to the **safety and convenience of foods**
- ✓ Provide a **technical and market response to public health needs**
- ✓ Contribute to the **sustainability of the food systems**
- ✓ Contribute to the **competitiveness of the European food and drink industry**

Re-evaluation of food additives
Background

Food additives permitted before 20 January 2009 must go through a new risk assessment by EFSA, according to a programme set up in Commission Regulation (EU) No 257/2010



- **Public calls for data**
  - Manufacturers of FA
  - Users of FA
- Published literature
- Previous evaluations
- Unpublished reports

Specific challenges of the re-evaluation of FA

➔ **Generic authorisations, complex engagement with relevant stakeholders**

By its very nature the process to deal with generic information/no well-identified data holder is fundamentally different from the process to deal with an application for a new food additive.

➔ **An evolving scenario, leading to lack of predictability in EFSA expectations**

Changing templates/requests from EFSA over time: from low level of information requested in first call in 2006 to high level of information requested in more recent calls, according e.g. to guidance on risk assessment of nanotechnologies, guidance on risk assessment of substances present in foods for infants below 16 weeks of age...

Progressive improvement of the re-evaluation procedure (1)

Engagement with EFSA

- Several meetings with EFSA to explain where issues are, sometimes jointly with DG SANTE
- EFSA workshops on re-evaluation of food additives (2014, 2017) with opportunities for industry presentation & discussion
- Discussion Group on Food Chemicals Occurrence Data
- Annual Round Table with industry associations (cross-cutting approach)

➔The constructive dialogue has led to a progressive improvement in the re-evaluation procedure.

However a few enhancements would still be beneficial to the different parties involved in this re-evaluation exercise, as identified in a membership survey in 2017*

* Detailed results presented at EFSA workshop on re-evaluation of food additives on 24/11/17

Progressive improvement of the re-evaluation procedure (2)

Examples of improvement for the data providers

- Better anticipation: publication of EFSA annual tentative work programme
- Call for use levels: additive usage template (progressive adjustments, training for users)
- Provision of requested data (including additional data requested by the WG/Panel from interested parties during the risk assessment): reasonable flexibility for negotiated deadlines
- Better accuracy of scientific output
- Better differentiation of risk assessment / risk management in wording used in Opinion' s recommendations: from «*the Panel recommended that xxx should be done* » to « *the Panel recommended that the European Commission considers xxx* »
- Extension of Catalogue of Services to Applicants to the data providers (e.g. post-adoption teleconference)

What could be improved further

Examples of expected improvement in terms of engagement with the data providers

- **Efficiency of exchanges during risk assessment: USE of the possibility of applicants' hearing at Working group and Panel's plenary meetings during risk assessment to clarify any outstanding issues on data provided** (recurrent request from our sector)
- Transparency: more informative minutes of WG meetings
- Better preparedness in case communication is needed:
  - Longer embargo period for pre-notified adopted opinion
  - Pre-notification under embargo of communications (web story, fact sheet etc.) around the adopted opinion

New areas of concerns

- **Discussion Group on Food Chemicals Occurrence Data**
  - Aim is "*to discuss and exchange information on the practical aspects and challenges regarding provision of occurrence data and usage data from stakeholders. The group's focus is mainly on food additives and chemical contaminants present in food and feed.*"
  - **The current flexibility in composition should be kept in the upcoming renewal of membership:** there should be no "artificial" self-limitation to access expertise through rules requiring mandatorily representation of the 7 stakeholders categories (what if e.g. no practitioner is interested in detailed discussions on the ideal template for data submission on usage levels of additives?) or by limiting the number of business & industry delegates to one per registered organisation (they are those who are using the system and can make suggestions to make it more efficient).
- **Commission proposal on transparency in risk assessment**
  - Uncertainty on consequences of the timing of proactive automatic disclosure on EFSA website of non-CBI, before the EFSA opinion is published
  - For the record: information that is relevant to the assessment of the safety of food additives shall not, in any circumstances , be regarded as confidential (Art. 12 of Reg. (EC) 1331/2008).

Thank you for your attention

Contact

EU Specialty Food Ingredients
Avenue de Tervuren, 13 A – Box 7
1040 Brussels – Belgium

+ 32 2 736 53 54

info@specialtyfoodingredients.eu

www.specialtyfoodingredients.eu