5 November 2020

Presentation of the content of the draft EFSA scientific guidance for the preparation of applications on smoke flavouring primary products

Technical hearing

on EFSA draft scientific guidance for the preparation of applications on smoke flavouring primary products

Trusted science for safe food

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European Food Safety Authority

1.
Regulatory update on smoke flavouring primary products

Regulatory framework

- Smoke flavouring primary products (PP) shall refer to the purified condensed smoke from wood. They are **complex mixtures** of substances
- They are covered by:
  - **Regulation (EC) No 1334/2008** on flavourings and certain food ingredients with flavouring properties for use in and on foods
  - **Regulation (EC) No 2065/2003** establishing procedures for their assessment and authorisation for use in EU
  - **Regulation (EU) No 1321/2013** establishing the EU list of authorised SMK (10 PP currently authorised in EU)
  - **Regulation (EC) No 627/2006** regarding the quality criteria for analytical methods for the characterization of PP
  - **Regulation (EC) No 178/2002**, as amended by **Regulation (EU) 2019/1381**

EU authorisations of new products, modifications

According to Art 7-9 of Regulation (EC) No 2065/2003:

- Applications are sent to the **competent authority of a Member State**. The competent authority informs EFSA and the other Member States.
- EFSA gives an **opinion within 6 months of the receipt of a valid application** but may extend that period (e.g. in case of requests for supplementary information to the applicant)
- The Commission prepares a draft authorisation/refusal within 3 months from EFSA opinion and submits it to the Standing Committee
- Authorisations of primary products are valid in the EU for **10 years**
- **Modifications, revisions, suspensions** are carried out following Article 11.

EU renewal of authorisations

As per Art 12 of Regulation (EC) No 2065/2003:

- Authorisations of primary products are valid in the EU for **10 years** and are **renewable** for 10-year periods

- Applications for renewal of authorisations must be sent **to the Commission** by the authorisation holders at the latest **18 months before the expiry date** of the authorisation.
  - The current authorisations were granted starting on 1 January 2014 and will therefore end on 1 January 2024

- The application procedure (articles 7-9) apply '*mutatis mutandis*'

- If, for reasons beyond the control of the authorisation holder, no decision is taken on the renewal of an authorisation until one month before its expiry date, the authorisation of the primary product shall automatically be **extended by 6 months**.

Timelines for renewal applications

Expected publication of updated EFSA guidance on smoke flavouring primary products

MARCH 2021

DEADLINE for current authorisation holders to submit RENEWAL applications for the authorised smoke flavouring primary products, as per Art 12 Reg (EC) No 2065/2003)

30 JUNE 2022

EFSA assessment (6 months)

EXPIRY DATE of the authorisations of smoke flavouring primary products currently authorised, as per Regs (EU) No 1321/2013 and 2065/2003

1 JANUARY 2024

As of 27/03/2021, the provisions of Regulation (EU) 2019/1381 will be applicable. In particular:
Pre-submission advice (Article 32a)
Notification in advance (Article 32b)
Consultation of third parties (Article 32c)
Transparency (Article 38)
Confidentiality (amended Article 15 of Regulation (EC No 2065/2003)

Current EFSA guidance documents on smoke flavouring primary products

- Guidance on the submission of a dossier on smoke flavouring primary products **(EFSA, 2005)**
  https://www.efsa.europa.eu/en/efsajournal/pub/492

- Dietary exposure assessment methods for smoke flavouring primary products **(EFSA, 2009)**
  https://www.efsa.europa.eu/en/efsajournal/pub/rn-248

- Statement on the interpretation of the margin of safety for smoke flavouring primary products **(EFSA, 2010)**
  https://www.efsa.europa.eu/en/efsajournal/pub/1325

Scope of the update

On **25 September 2019** the European Commission requested EFSA to:

- Compile an **updated consolidated guidance** document for the submission of applications **on smoke flavouring primary products** under Regulations (EC) No 2065/2003 and No 1321/2013
- Clarify the **data required** from industry when preparing applications for **new** smoke flavouring primary products, for **renewals** and for **modifications** of existing authorisations and to explain the **approach to be followed in the risk assessment**
- Take into account the **relevant cross-cutting guidances/documents** published by EFSA since the adoption of the current guidance on smoke flavourings
- To carry out this updating **within 18 months** from the receipt of the request, i.e. by 25 March 2021
- The request has been registered under **EFSA-Q-2019-00687** and is publicly available in the EFSA Register of Questions at this LINK

➢ Of note: the comparison between primary products and conventional methods of smoking and their respective impact on human health and the environment is outside the scope of this guidance document.

2.
Introduction to the guidance document

Timelines for the development of EFSA guidance on smoke flavouring primary products

24 JUNE 2019
***Ad-hoc* meeting**
with industry representatives on smoke flavourings

25 SEP 2019
EC Mandate received by EFSA

10 DEC 2019
1st meeting of **WG on Guidance Update on Flavourings**

21 SEP 2020
Endorsement of the draft guidance for public consultation at FAF Panel open plenary

From 5 OCT to 16 NOV 2020
(6 weeks)
Public consultation of the draft guidance

5 NOV 2020
Technical hearing with interested parties (virtual meeting)

26-28 JAN 2021
Possible **adoption** of updated GD document by the FAF Panel

By March 2021
Publication of updated GD document and of the technical report on public consultation

Activities of WG on Guidance Update on Flavourings available HERE

Structure of the draft scientific guidance

➢ Chapter 1 - Characterisation of Primary Product

Data requirements on the **production process, compositional data, specification and stability** of the primary product

➢ Chapter 2 - Proposed uses and exposure assessment

Data requirements on the **proposed uses and use levels** and the **exposure** to the primary product

➢ Chapter 3 – Safety data

Type of **toxicity studies** needed to demonstrate the safety of the primary product for human health and for the environment, including data on its **genotoxic potential**, **toxicological information** and information on the **safety for the environment**

➢ Chapter 4 – Uncertainty

Including the characterization of the **standard uncertainties** relevant to the safety assessment of smoke flavouring primary products together with a description on how they are expected to influence the outcome of the risk assessment.

Possible scopes of a technical dossier on smoke flavouring primary products

1) NEW AUTHORISATIONS

(Art 7 of Regulation (EC) No 2065/2003)

2) RENEWALS of existing authorisations

(Art 12 of Regulation (EC) No 2065/2003)

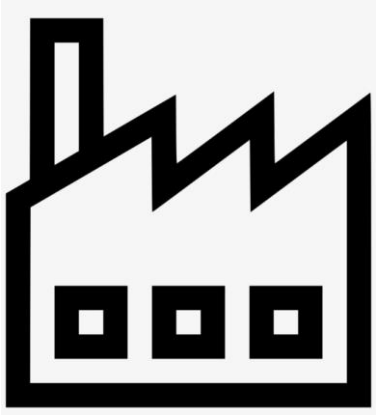
3) MODIFICATIONS of existing authorisations

(Art 11 of Regulation (EC) No 2065/2003 – data requirements will depend on the type of proposed modification, e.g. changes in the conditions of use, source materials, production process, specifications, etc.)

3. Characterisation of the primary product

Manufacturing process

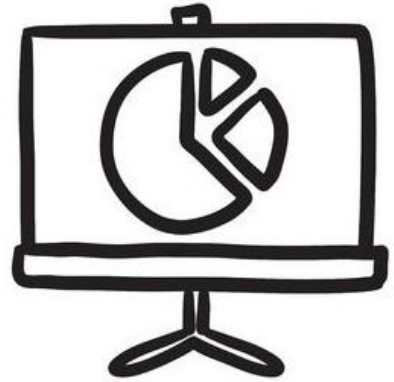
- **All source materials,** e.g. species of trees (woods), used for the production of the primary product have to be listed. If more than one species of wood or other ingredients are used, proportions and ranges have to be mentioned.



- **The key steps of the production process** by which the raw materials are converted to the primary product should be described with sufficient details:
  - ✓ the **fractions** of the smoke condensate used to obtain the primary product, i.e. the water-soluble phase (**primary smoke condensate**) and/or the water-insoluble tar phase (**primary tar fraction**), and the employed purification steps should be described in detail
  - ✓ A **flow chart diagram** showing the most important steps in the process should accompany the description

Chemical composition

- The minimum proportions of the **solvent-free mass** and of the **volatile fraction** to be identified and quantified in the primary product should be provided in line with Regulation (EC) No 627/2006.



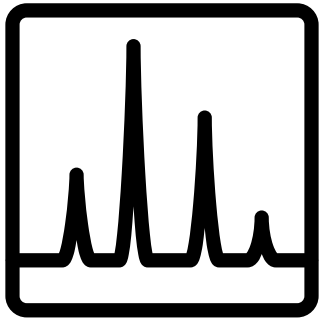
Quality criteria for methods for identification and quantification of chemical constituents in the solvent free mass and the volatile fraction of primary products

Parameter	Value/Comment
Solvent free mass	At least 50 % by mass shall be identified and quantified
Volatile fraction	At least 80 % by mass shall be identified and quantified

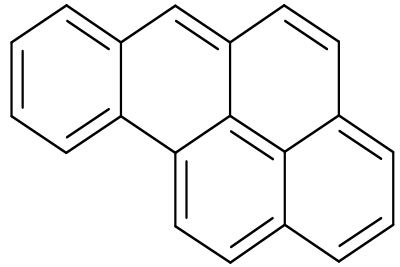
- Without prejudice to the provisions in Regulation (EC) No 627/2006 and considering the progress in the analytical methods, allowing improved qualitative and quantitative analysis, the components of a primary product should be characterized **as fully as possible** (applicable to both volatile and non-volatile fractions) **to minimize the unidentified fraction.**
- This information is required as basis for the **component-based approach** employed for the genotoxicity assessment of the primary product.

Identification and quantification of individual components

- **State-of-the-art analytical methodologies** should be applied for the analyses of both volatile and non-volatile fractions (e.g. GC-MS and GC-FID for the volatile fraction, GPC-MS or HPLC-MS for the non-volatile fraction).
- Unequivocal **chemical identifications** (**names and CAS numbers**) of the individual components and information on their **concentrations** should be provided.
- If components remain unidentified, information on their **quantitative contribution** to the **total fraction** should be provided, e.g. for volatile components by estimating the peak areas by GC-FID analysis.
- **Explanations** should be provided why the **unidentified fraction** could not be reduced via manufacturing steps and why no higher proportion of the product could be identified.



Polycyclic aromatic hydrocarbons (PAHs)



- The concentrations of **16 PAHs** listed in Appendix A of the guidance should be provided. Besides the concentrations of the **15 PAHs** already reported in Regulation (EC) No 627/2006, also the concentration of **benzo[c]fluorene** should be monitored analytically in primary products, in line with JECFA (JECFA, 2005).
- With the analytical techniques currently available, it is expected that PAHs are determined at **lower limits of detection (LOD) and limits of quantification (LOQ)** than those reported in the Annex of Regulation (EC) No 627/2006.
- Adequate **certificates of analysis** should be provided, specifying the analytical methodology(ies) applied and their respective performances (i.e. reporting how the LOD and LOQ values have been established by the laboratories).
- **Maximum contents of 2 PAHs** in primary products are set by Regulation (EC) No 2065/2003 (i.e. **benzo[a]pyrene < 10µg/kg** of primary product, **benzo[a]anthracene < 20µg/kg** of primary product).

Batch-to-batch variability

- Batch-to-batch variability should be investigated in **at least five batches** from different production runs.
- Information on **how these batches were selected** should be provided.
- The proportions of **source materials (e.g. woods)** used to produce the analyzed batches should be described.
- Information on batch-to-batch variability for the measured **chemical sum parameters** (i.e. contents of major classes of components with common structural aspects, such as acids, carbonyls or phenols) as well as for **individual identified and non-identified components** should be provided.
- The variability should be judged based on the **relative standard deviations (RSD)** of the data determined on individual components in the different batches and by statistical analysis of the similarities between batches.

Specifications

- Identity parameters:
  - ✓ source materials
  - ✓ proportions of the major classes of components
  - ✓ 20 principal constituents of the volatile fraction
- Purity criteria:
  - ✓ maximum levels for PAHs
  - ✓ toxic elements, e.g. heavy metals
- Any proposed specifications should be supported by adequate analytical data in order to demonstrate that the primary product is **consistently manufactured**

4. Proposed uses and exposure assessment

Use levels

Applicants should provide information on:

- **NEW smoke flavouring primary products**
  - **PROPOSED MAXIMUM use levels for foods within a food category** and
  - **EXPECTED TYPICAL use levels** i.e. the most common use levels of the primary product proposed for foods in a food category

- **RENEWALS of authorisations of smoke flavouring primary products**
  - **PROPOSED MAXIMUM use levels* for foods within a food category** and
  - **TYPICAL use levels** i.e. the most common use levels of the primary product for foods in a food category

* they may be equal to the MPLs included in Regulation (EU) No 1321/2013 for broad food categories or may be lower than the MPLs or only applicable to some foods within a food category.

Use levels

- Proposed maximum and typical use levels should be provided **for all food categories** in which the primary product is requested to be authorised or for which a renewal of its authorisation is requested.
- Food categories should be coded according to:
  - food categories of **Annex II, Part D, of Regulation (EC) No 1333/2008** and
  - the **FoodEx2** nomenclature
- As the food categories containing smoke flavouring primary products can be very broad, preferably use levels should be provided **for specific foods in a food category** in which the primary product is or may be used. For this level of detail, **FoodEx2** nomenclature should be used.
- The **more detailed** the information is on foods in which the primary product is or may be used, the **less conservative** the exposure estimate will be.

Exposure assessment

- Applicant should provide dietary exposure estimates to the primary product by means of **two exposure assessment tools** developed by EFSA based on the **proposed maximum and (expected) typical use levels**:
  - **FAIM** (Food Additive Intake Model)
  - '**EFSA exposure' tool** (to be released on EFSA website by Q4 2020/Q1 2021)
- Both tools use the **consumption data** of the **EFSA Comprehensive European Food Consumption Database** at different levels of detail to estimate the exposure.
- Consumption data are categorised according to the food categories of Annex II, Part D of Regulation (EC) No 1333/2008 for FAIM and FoodEx2 for the 'EFSA exposure' tool.
- During the risk assessment, EFSA will consider these exposure estimates submitted by the applicant and **will refine** them, if necessary (e.g. too low MoS).

5. Safety data - Introduction

General considerations (1)

- Toxicological studies should be carried out with the **smoke flavouring primary product as intended to be marketed**:
  - the test material should be manufactured according to the production process
  - meet the compositional data as described in the dossier (falling within the ranges expected from the determined batch-to-batch variability)
  - be in compliance with the proposed specifications
- Toxicity studies should generally be conducted in accordance with most recent **OECD test guidelines** and **GLP**.
- The concept of comparison to **sufficiently similar mixtures does not apply** to primary products. Therefore, read-across of toxicity data from one primary product to another is not considered justified.

General considerations (2)

- Smoke flavouring primary products **are complex mixtures that may contain a fraction of unidentified components**. Therefore, the principles outlined in the SC guidance on harmonised methodologies for risk assessment of combined exposure to multiple chemicals (EFSA SC, 2019a) and in the SC statement on genotoxicity assessment of chemical mixtures (EFSA SC, 2019b) should be applied.
- For **toxicity endpoints** other than genotoxicity, a **whole mixture approach (WMA)** is the preferred method of testing complex mixtures such as primary products, as it has the advantage of not only including individual components but also could reflect interactive effects of multiple components and effects of the unidentified components.
- For **genotoxicity** assessment of primary products a **combination of a component-based approach (CBA) and a WMA** is required, as genotoxicity of individual components may not be detected by testing the whole mixture, e.g. as a result of dilution.
- The **assessment of the genotoxic potential** of individual components and of the unidentified constituents in a primary product **should be carried out before conducting any *in vivo* toxicity studies**, other than to test for genotoxicity, or studies addressing environmental safety.

6. Safety data - Genotoxicity

Genotoxicity

- The **identified components** should be assessed individually with respect to their genotoxic potential, using all available data. Conclusions on genotoxicity are required for all identified components → **CBA**

- The **fraction of unidentified components** should be tested for genotoxicity. If not feasible, testing of the whole mixture should be undertaken → **WMA**
  - It is recognised that **a clear separation of identified and unidentified components might be difficult**. Nevertheless, attempts to fractionate the test material should be made on a case by case basis to minimise the dilution of the components of interest or to remove highly cytotoxic components in the tested sample.

- Genotoxicity data on the identified components and on the unidentified fraction should be collected and evaluated based on the **genotoxicity testing strategy** described by the **Scientific Committee** (EFSA SC, 2011) (EFSA SC, 2017) and (draft EFSA SC, 2020).

Genotoxicity testing strategy (SC, 2011)

- Applicable to both **individual components** and the **fraction of unidentified components** of primary products

TIER 1

- **Genotoxicity *in vitro***
  - Bacterial reverse mutation assay (OECD TG 471)
  - *In vitro* MN assay (OECD TG 487)

Triggers

Positive *in vitro* genotoxicity

TIER 2

- **Genotoxicity *in vivo*****
  - *In vivo* transgenic rodent gene mutation assay (OECD TG 488)
  - *In vivo* Comet assay (OECD TG 489)
  - *In vivo* mammalian erythrocyte micronucleus assay (OECD TG 474)

* to be selected case-by-case based on *in vitro* test results, SAR, metabolic and toxicokinetic considerations

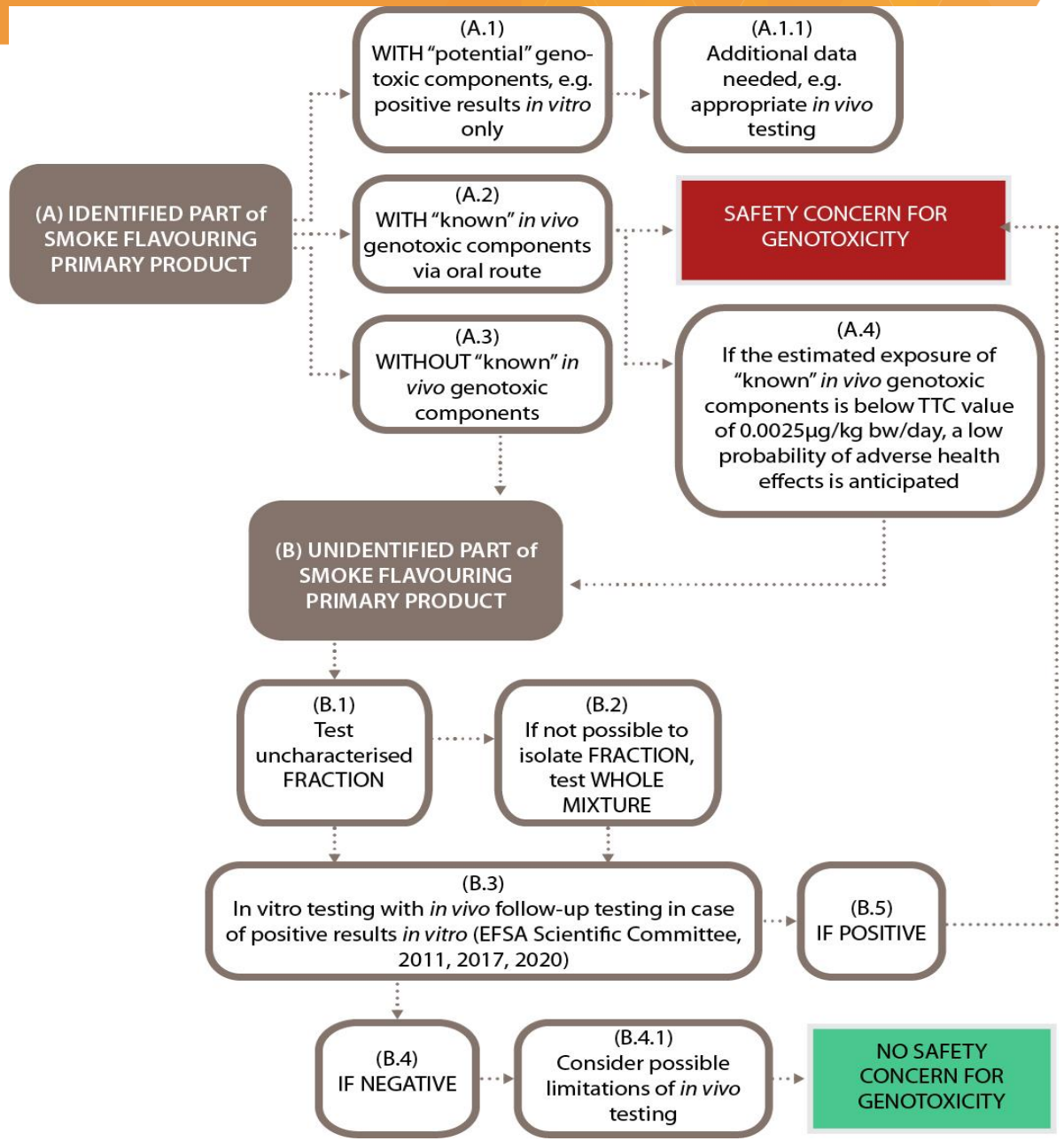
In silico predictions for genotoxicity of identified components (1)

- **If no other information on genotoxicity is available**, e.g. published or unpublished studies, **structure activity relationship (SAR)** information about the genotoxic potential of each identified component may be considered.
- If only ***in silico* predictions** for the genotoxicity endpoints are available for an identified component, and they are **assessed as negative** in a combination of independent and scientifically valid (Q)SAR models, i.e. it is required to run more than one (Q)SAR model for each genotoxicity endpoint, the substance may be considered not to raise a concern for genotoxicity and **no further testing will be necessary.**
- EFSA will closely consider the *in silico* information provided by the applicant and in specific cases **additional data may be requested.**
- In case of **positive *in silico* prediction(s),** additional testing is required.
- The conditions needed to consider the results of (Q)SAR analyses as reliable for risk assessment are described in section '**3.2.1 *In silico* methods for the prediction of genotoxicity**' of the guidance.

In silico predictions for genotoxicity of identified components (2)

- *In silico* methods can only be **applied to individual chemicals**, not to mixtures.
- Chemical identifiers, e.g. **CAS numbers and SMILES codes**, should be provided for all identified components of the primary product to allow for direct *in silico* analysis
- The principles outlined in the **ECHA guidance on (Q)SAR and grouping of chemicals** (ECHA, 2008) should be followed.
- The results of (Q)SAR methods may be considered as sufficient in the risk assessment provided that the following conditions are met:
  - (Q)SAR models for which **scientific validity** has been established are used. The models should comply with the **five OECD principles** for (Q)SAR validation (OECD, 2007);
  - the substance falls within the **applicability domain** of the (Q)SAR models;
  - the predictions are **relevant for the regulatory purpose**; and
  - the information on the models and the predictions are **well documented**.
- Appendix D provides examples of available ***in silico* computation platforms** implementing **(Q)SAR models** for the prediction of the various genotoxicity endpoints (e.g. OECD (Q)SAR Toolbox, ToxTree, etc)

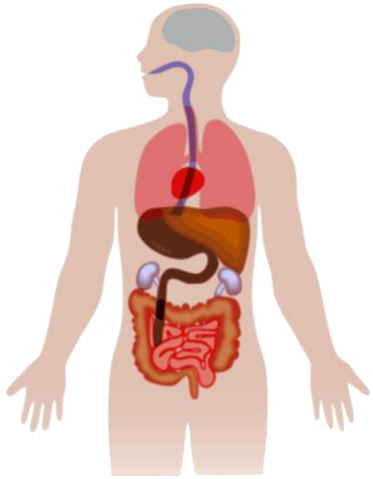
Evaluation scheme for genotoxicity assessment of a primary product



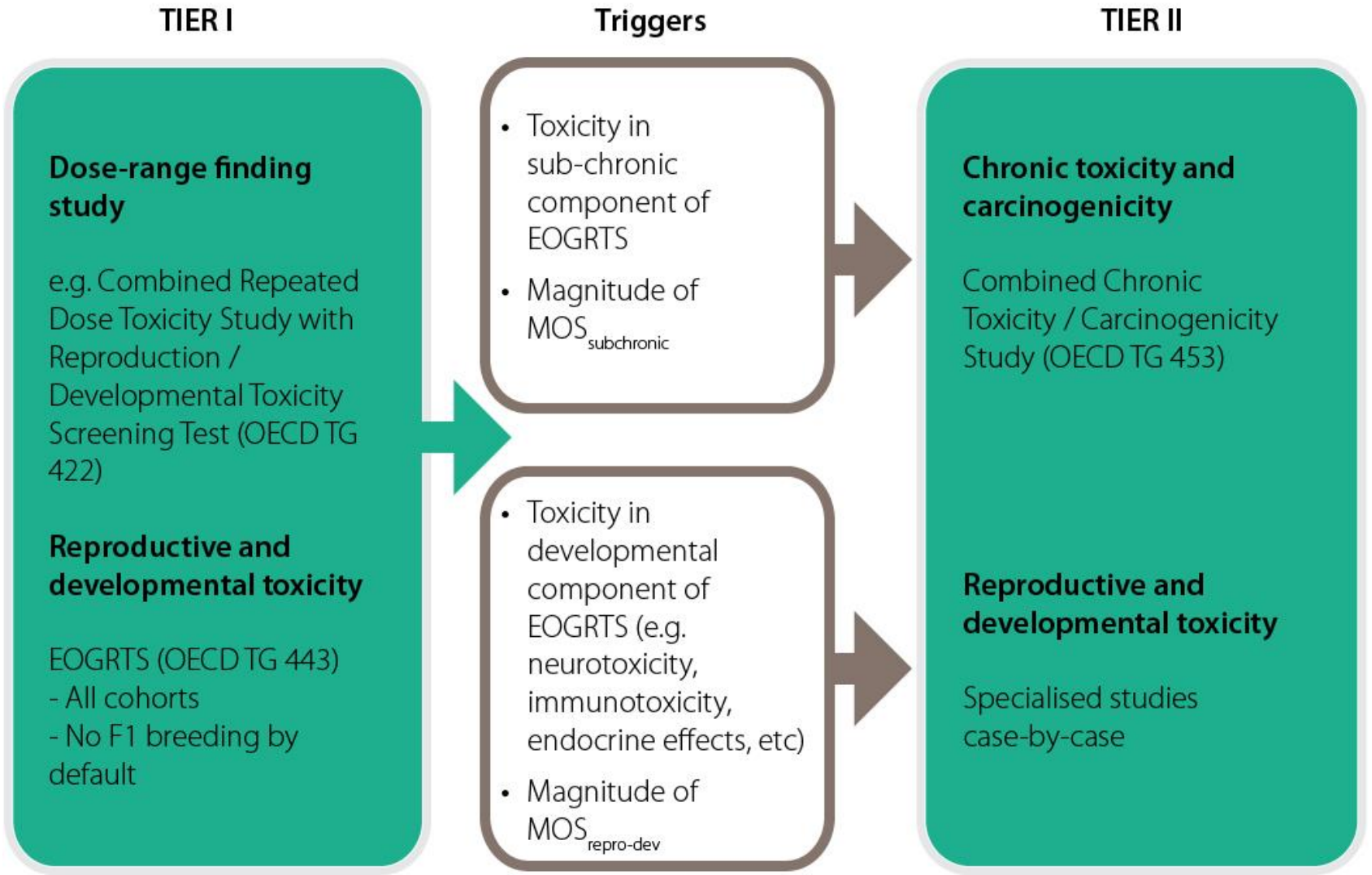
6. Safety data - Toxicity other than genotoxicity

Toxicity

- **No default requirements for acute toxicity** data for primary products.
- **ADME not requested for primary products** due to difficult interpretation of toxicokinetic studies, considering that a substantial part of the tested material may remain unidentified.
- Based on information available from previous evaluations of primary products, it can be assumed that they contain constituents that are **absorbed** (at least in part) **in the GI-tract** and are **systemically available.**
- Toxicity data for primary products are requested following a **tiered approach**, in line with the toxicity testing strategy outlined in the Guidance for submission for food additive evaluations (EFSA, 2012).



Tiered toxicity testing – NEW AUTHORISATIONS



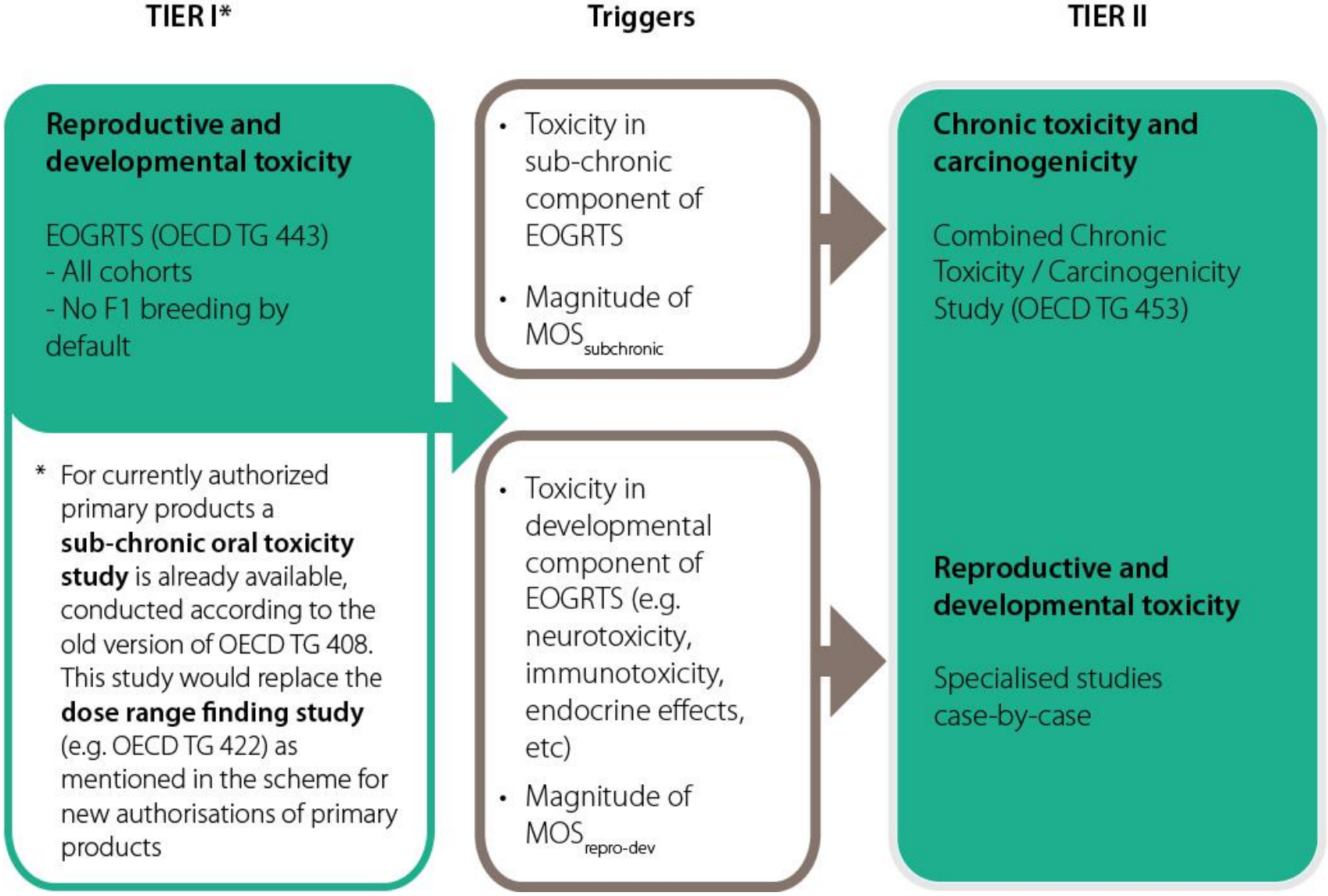
Magnitude of MOS sub-chronic:

MOS < 100 → primary product raises a safety concern at the proposed use levels

100 < MOS < 300 → request a combined chronic toxicity/carcinogenicity study (OECD TG 453)

MOS > 300 → no safety concerns at the proposed use levels

Tiered toxicity testing – RENEWALS



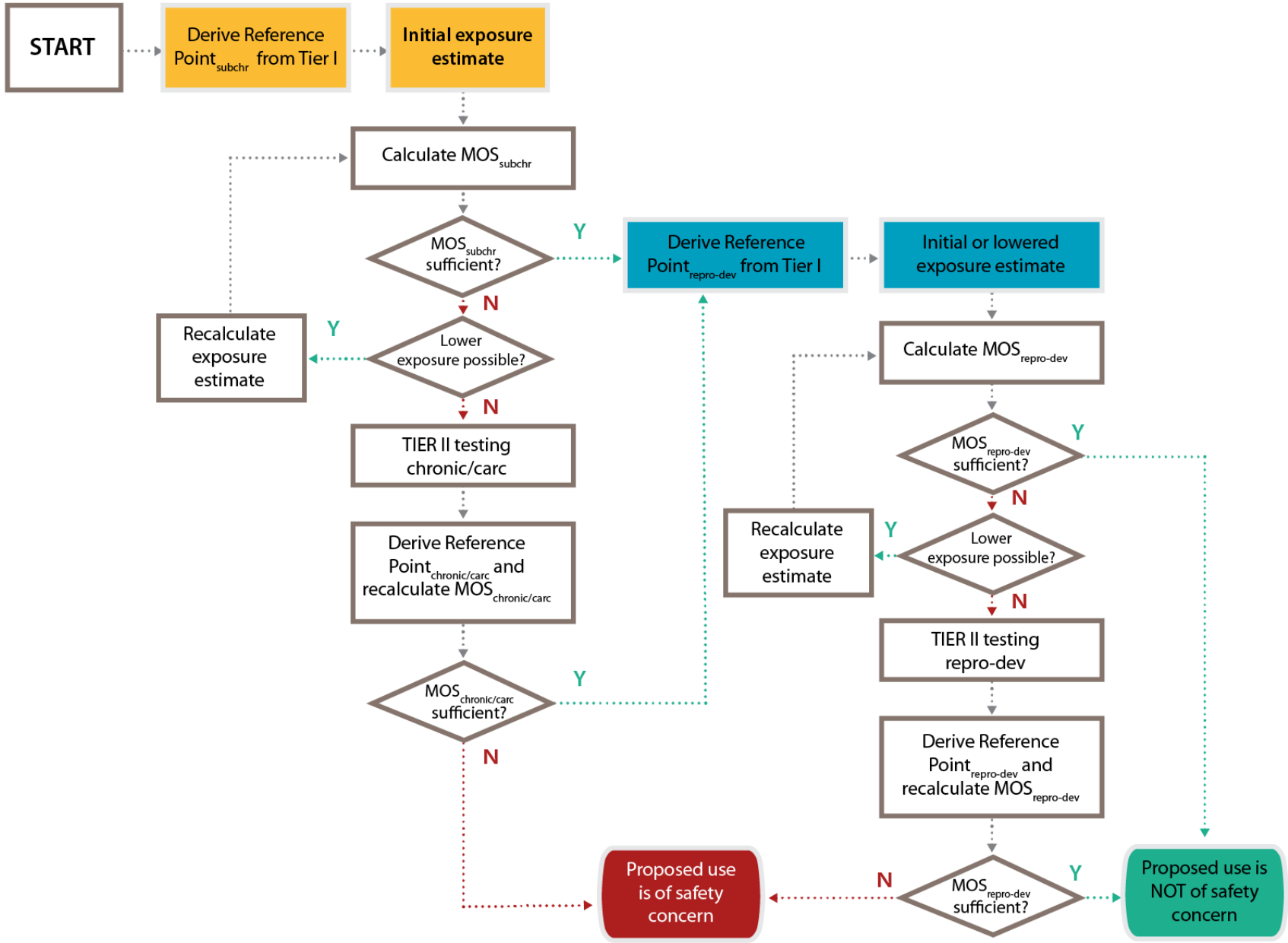
Magnitude of MOS sub-chronic:

MOS < 100
→ primary product raises a safety concern at the proposed use levels

100 < MOS < 300 → request a combined chronic toxicity/carcinogenicity study (OECD TG 453)

MOS > 300 → no safety concerns at the proposed use levels

Decision scheme for Tier II toxicity testing



Environmental safety (1)

- A **full environmental risk assessment (ERA)** is **not required by default** for primary products, considering that:
  - they are produced by pyrolysis of defined types of woods, i.e. naturally occurring source materials
  - their production is performed under controlled conditions and involving in most cases the extraction into an aqueous phase. Constituents with high lipophilicity will, therefore, be absent or present in very low concentrations
  - their constituents are expected to be extensively metabolized by the human body after consumption and/or readily biodegraded in a sewage-water treatment (STP) prior to their release into the environment
- There may be primary products for which **these considerations may not be applicable**, e.g. those obtained by manufacturing processes resulting in an increased proportion of the water insoluble high-density phase of condensed smoke (**primary tar fraction**).

Environmental safety (2)

- In this case, the applicant should investigate whether the primary products contain constituents that are not extensively metabolised and/or readily biodegradable and **should provide evidence to demonstrate absence of concern for the environment.**
- The **testing strategy** and risk assessment schemes already described for substances with a similar emission pattern and/or exposure routes such as **biocides** (ECHA, 2017) or **medicinal products** for human use (EMA, 2019) could be followed.
- *In silico* methods, such as **(Q)SARs** (ECHA, 2008) **could also be considered** provided they are relevant, reliable and adequate for the purpose and are documented in an appropriate manner.

8. Uncertainty

Uncertainty

- In line with the SC Guidance on Uncertainty Analysis (EFSA SC, 2018), each step of the risk assessment performed by EFSA should clearly and unambiguously document which **sources of uncertainty** have been identified and **evaluate their impact** on certainty in the assessment conclusion.
- **Applicants do not need to describe or assess uncertainties** themselves. After submission of the data, uncertainty analysis will be part of the risk assessment done by EFSA.
- **Appendix F** of the guidance includes a list of **standard uncertainties** affecting the assessment of smoke flavourings and how these are treated in the **standardised procedure**, i.e. the procedure that specifies every step of assessment for a specified class of products and is accepted by assessors and decision-makers as providing an appropriate basis for decision-making.
- Appendix F includes criteria to aid EFSA in determining whether **non-standard uncertainties** are present, i.e. additional uncertainties that go beyond the standard uncertainties covered by the standardised procedure.
- Presence of **non-standard uncertainties** in the risk assessment is a trigger for more detailed uncertainty analysis.

Standard sources of uncertainty – examples (1)

Location of standard uncertainty	Treatment in standardised procedure	Criteria to be a standard uncertainty
Chemical composition (1.2.3)	Require the applicant to apply **appropriate methods to sample and to analyse** the volatile and non-volatile parts of the primary product.	Methods are appropriate and comply with the requested performance and quality criteria. A detailed description of the methods applied is included in the dossier.
Unidentified fraction (1.2.3.4)	Require the applicant to demonstrate that **efforts have been made to reduce the unidentified fraction**.	Unidentified fraction is below the limit requested in Regulation (EC) No 627/2006 and, regardless of these limits, sufficient analytical efforts to reduce the fraction of unidentified components have been demonstrated.
Reproducibility of the production (1.2.3.6)	Require the applicant to provide analytical data on **at least five batches**, including a description of how they were selected and ensure that the batches analysed cover the range of different proportions of source materials intended to be used. EFSA will estimate batch-to-batch variability with statistical methods.	The batches are from different production runs. If applicable, for each batch, the proportions of woods are indicated and the batches analysed cover the range of source materials. Batch-to-batch variability per identified compound is acceptable.

Standard sources of uncertainty – examples (2)

Location of standard uncertainty	Treatment in standardised procedure	Criteria to be a standard uncertainty
Proposed use levels (2.1)	EFSA will perform the risk assessment based on the information submitted by the applicant on proposed maximum and (expected) typical use levels. No uncertainty is taken into account in these levels, other than ensuring that **the definitions of typical and maximum use levels are unambiguous** to avoid different interpretations.	Definitions of use levels are judged as unambiguous by EFSA.
Food consumption data for the foods in which the primary product is (proposed to be) used (2.2)	EFSA will estimate the exposure based on the food consumption data in the **EFSA Comprehensive European Food Consumption Database** and **will consider indications of low reliability in the estimates**.	Documentation that there was no indication of low reliability in the exposure estimates due to limitations in the food consumption data.

Standard sources of uncertainty – examples (3)

Location of standard uncertainty	Treatment in standardised procedure	Criteria to be a standard uncertainty
Genotoxicity testing of individual components or of the fraction of unidentified components (3.2)	Require the applicant to **perform the genotoxicity testing of the individual components** according to the relevant OECD TGs for genotoxicity assays. Require the applicant to **perform genotoxicity testing of the whole mixture containing the unidentified part** (only if the identified components are of no concern for genotoxicity and if separation of the fraction of unidentified components for experimental testing is not feasible).	Genotoxicity testing performed in line with the criteria reported in relevant OECD TGs for genotoxicity testing. Absence of any issues indicating non-standard uncertainties affecting interpretation of the results.
Lack of experimental data on genotoxicity of individual components (3.2.1)	Require the applicant to apply ***in silico* assessment on the individual components for which the experimental data on genotoxicity are missing**, when the conditions described in Section 3.2.1 of this guidance are met.	The conditions for the acceptability of the applied (Q)SAR methods are met as described in Section 3.2.1.

Standard sources of uncertainty – examples (4)

Location of standard uncertainty	Treatment in standardised procedure	Criteria to be a standard uncertainty
Type of toxicity study (3.3.3)	**Add uncertainty factors** to adjust the requirement for an adequate MOS according to the type of toxicity data available.	See Section 3.3.3
Representativeness of the batch selected for toxicity testing (3.1)	EFSA will evaluate whether the **tested batch is representative of the material of commerce** based on its description, its compositional data and the criteria for its selection.	No indication that batch(es) used in toxicity testing are not representative of the material of commerce.
Data on environmental safety (3.4)	**No default requirement for environmental risk assessment**, provided that the manufacturing process employed does not indicate that the primary product may contain constituents that are not extensively metabolised and/or readily biodegradable.	Assessment of the manufacturing process of the primary product does not indicate a potential for the presence of constituents that are not extensively metabolised and/or readily biodegradable.

Final remarks

Public consultation

- The **public consultation** on the draft scientific guidance for the preparation of applications on smoke flavouring primary products is available at the following LINK
- Please use the online form to submit your comments
- Deadline: **Monday 16th November 2020**

Technical report on the outcome of public consultation

- **Questions that could not be answered** today during the technical hearing will be addressed **in writing** after the event, in the **technical report on the outcome of the public consultation** on the draft scientific guidance to be published **by March 2021**.