

SPANISH OPINION ON THE DRAFT SCIENTIFIC OPINION ON DIOXINS AND PCBs

26 September 2018

First of all, Spain would like to thank EFSA for making the draft of the scientific opinion on dioxins and PCBs available for comments to the Member States. After carefully reading the scientific opinion, we understand the great effort that the EFSA's CONTAM Panel has made in the compilation and analysis of the necessary documentation for the elaboration of the mentioned document which is based on the results of samples from 24 EUMS analyzed during the years 2010-2016.

We acknowledge the significant decrease in the TWI for exposure to these substances falling from a TWI of 14 pg WHO-TEQ / kg bw for PCDD/Fs and DL-PCBs to 2 pg TEQ/kg bw per week (seven times less). Besides, we consider that the current scenario with a considerable exceedance of the new TWI for the EU population implies the discussion on the revision of the risk management measures in order to protect our consumers. In terms of consumer perception, the shorter timeframe between the publications of this scientific opinion and the implementation of the revised measures, the better for the consumer's health protection.

In spite of this, in the document EFSA has identified several uncertainties associated with the evaluation process (with a moderate impact in the case of dioxins and high in PCBs) which we think should be further investigated in order to reach more substantiated conclusions. More work has to be done by EFSA to minimize these uncertainties. Consequently we can support the recommendations made by EFSA in the document.

In this regard, we would like to focus on some of these recommendations. EFSA makes reference to the fact that there is a need to update the risk-benefit assessment of fish consumption. We strongly agree with this idea coming from the European Authority. Since fish and seafood products are identified in the opinion as the main contributor of the exposure to these contaminants, we are concerned about the immediate consequences that the publication of this opinion could have. Launching this paper as it is drafted could generate a considerable impact by identifying only one risk associated to the fish but not including a reference to the advantages/benefits for the health linked to this consumption. Furthermore, we would also like to draw your attention to the strong socio-economic impact that could be derived from the publication of this opinion in its current stage. It will have a direct impact on consumer diets with a decrease on the consumption of fishery products whose benefits are undoubtedly proven. It will also affect the European Fishing Sector, which is one of the most important economic activities in Spain and many families' source of economic income. We believe that these aspects should also be taken into account in the debate together with other considerations such as recommendations on intake, risk populations, etc.

In conclusion, we believe that this opinion must necessarily be accompanied by an updated risk-benefit report to facilitate the risk management in the Member States and to be able to make suitable consumption recommendations in order to minimize exposure of our population to these substances.