



Technical Stakeholder Event: Re-evaluation of  
authorised food additives- focus on sweeteners

3 December 2019

# Feedback from the public consultation on the draft protocol for dietary exposure

**WG Sweeteners sub-group Exposure**

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# Public consultation on the 'exposure protocol' on sweeteners

- From 10 October to 22 November 2019
- Comments received from 10 different sources : industry/associations and public sector (national authority, researcher)
- [FIP.PublicConsul.EUS.002@efsa.europa.eu](mailto:FIP.PublicConsul.EUS.002@efsa.europa.eu)

## Public consultation on the draft protocol for the exposure assessment as part of the safety assessment of sweeteners under the food additives re-evaluation programme

Deadline: 22 November 2019

[Document](#) (284.84 KB)

[Privacy statement](#) (208.3 KB)

[Appendixes](#) (7.89 MB)

EFSA's Panel on Food Additives and Flavourings (FAF Panel) has launched an open consultation on the draft "Protocol for the exposure assessment as part of the safety assessment of sweeteners under the food additives re-evaluation programme" conducted in the framework of Regulation (EC) No 257/2010. This consultation is intended to gain inputs from the interested parties and the scientific community on the proposed approach to assess the exposure to sweeteners that are being reevaluated by EFSA in the context of the re-evaluation programme of food additives. Interested parties are invited to submit written comments.

Please use the [electronic template](#) provided by 22nd November 2019. Please refer to the line and page numbers. To submit additional data or files to support your comments, there is an upload function available in the tool (a maximum of 1 Mb file size). Otherwise, you can also write to the following email address:

[FIP.PublicConsul.EUS.002@efsa.europa.eu](mailto:FIP.PublicConsul.EUS.002@efsa.europa.eu)

Please note that comments will not be considered if they:

- are submitted after the closing date of the public consultation
- are presented in any form other than that provided for in the instructions and template
- are not related to the contents of the document
- contain complaints against institutions, personal accusations, irrelevant or offensive statements or material

### Subject area

- [Food additive re-evaluations](#)
- [Food additives](#)
- [Food ingredients and packaging](#)
- [Sweeteners](#)

- Mintel GNPD data
- Facet issues
- Food supplements
- Niche products
- Method of grouping food additives for their evaluation

- Overall recommendation to use Mintel GNPD in order to refine the exposure assessment
- Agreement that Mintel GNPD only be used to evaluate possible over/underestimation and does not impact the exposure
- Call for Appendix B to be redrafted for each specific sweetener since all sweeteners do not have same MoA.

- Overall recommendation to use Mintel GNPD in order to refine the exposure assessment
- Agreement that Mintel GNPD only be used to evaluate possible over/underestimation and does not impact the exposure
- *Mintel GNPD will be used as qualitative tool*
- Call for Appendix B to be redrafted for each specific sweetener since all sweeteners do not have same MoA.
- *Number of foods containing sweetener according to Mintel GNPD will be provided for each opinion*

- “if it is assumed that a positive facet for sweeteners indicates the presence of any sweetener, then errors will result because various sweeteners have different usage patterns”
- Concern that use of facet might underestimate use of sweeteners for function other than sweetening agent (e.g. flavour enhancer-Neotame)
- Facets do not discriminate between low cal and bulk sweeteners, which are used and consumed differently
- *This might be the case. Any over/under estimation should be acknowledged in the uncertainty section within each opinion. The use as flavour enhancer should be considered in the regulatory scenario.*

- “Use of certain facets is limited to some countries, does this imply that for all countries these facets will not be used? Or will those facets be part of a sensitivity analyses studying the impact of (not) using certain facets?”
- Facets may not clearly identify all FCs which sweeteners are permitted in
- *Food consumption surveys not reporting foods with facets will be flagged in the estimated results. The scenario mentioned in the uncertainty section should show the impact if not using facets.*
- Clarification of facets “light-diet”, “part-nature”
- Clarification of energy drinks always containing facts when 7/17 countries reported facet.
- *Few information from the facets for this food category, while Mintel GNPD indicate a relatively high % of energy drinks labelled with any sweetener*

- A generalisation of content and level across food supplement is not possible, nor appropriate
- *Forms (liquid, solid) of FS as recorded in food surveys should be investigated*
- Only specific food supplement types would contain sweeteners and the GNPD % cannot be assumed to represent all food supplements.
- *Mintel information used as qualitative check; facets for this food category rather not used in food surveys*



- Recommended daily amount on labels is a far more meaningful parameter to consider
- Strong recommendation to reclassify food supplements based on the expected range of daily intake (depending on its form e.g. tablets 1-5g, powders 5-20g)
  - *Need for collection of such information while food consumption surveys are available*
  - *This would not consider intake from different forms of food supplements*

- Request for a guidance on what constitutes a niche product
  - *Defined by industry; e.g. used by a specific population group, or in a specific geographical area*
- Use of sweeteners in food categories low frequency of occurrence in GNPD should be considered as niche products for this assessment (e.g. meal replacement drinks and total diet replacements)
  - *Niche products considered*

- Request for clarification on why substances are grouped as such, as it does not follow common practise in other EFSA panels. Grouping can be based on having same MoA, same target organ, or same phenomenon
  - *The grouping of additives depends on their toxicological pattern*
- Besides the chronic exposure, please provide for an acute exposure assessment related to laxative effects of polyols and discuss possible cumulative effects of different polyols.
  - *This is also depending on the hazard characterisation*
  - *If needed, an acute exposure assessment could be performed*

- Overall, clarifications are needed:
  - What is Mintel GNPD, how it will be used
  - Facets are used to select the foods containing a sweetener (except for some food categories)
  - Which scenario, how

Thank you for your comments and your attention

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