

Minutes

67th MEETING OF THE EFSA ADVISORY FORUM Utrecht, The Netherlands, 6 February 2018

Chair: Bernhard Url

Members	
Austria	<i>Klemens Fuchs</i>
Belgium	<i>Benoit Horion</i>
Bulgaria	<i>Georgi Georgiev</i>
Croatia	<i>Andrea Gross-Boskovic</i>
Cyprus	<i>Stelios Yiannopoulos</i>
Czech Republic	<i>Jitka Goetzova</i>
Denmark	<i>Flemming Bager</i>
Estonia	<i>Martin Minjajev</i>
Finland	<i>Matti Aho</i>
France	<i>Charlotte Grastilleur</i>
Germany	<i>Andreas Hensel</i>
Greece	<i>Eirini Tsigarida</i>
Hungary	<i>Ákos Bernard Józwiak</i>
Iceland	<i>Jon Gislason</i>
Ireland	<i>Pamela Byrne</i>
Italy	<i>Alessandra Perrella</i>
Latvia	<i>Vadims Bartkevičs</i>
Lithuania	<i>Snieguole Sceponaviciene</i>
Luxembourg	<i>Nathalie Welschbillig</i>
Malta	<i>Ingrid Borg</i>
Netherlands	<i>Antoon Opperhuizen</i>
Norway	<i>Danica Grahek-Ogden</i>
Poland	<i>Jacek Postupolski</i>
Portugal	<i>Pedro Portugal Gaspar</i>
Slovenia	<i>Urška Blaznik</i>
Slovakia	<i>Petra Vankova</i>
Spain	<i>Ana Canals Caballero</i>
Sweden	<i>Cecilia Hulten</i>
United Kingdom	<i>Jesus Alvarez-Pinera</i>

Observers	
Albania	<i>Pamela Radovani</i>
Bosnia-Herzegovina	<i>Dzemil Hajric</i>
FYR of Macedonia	<i>Zoran Atanasov</i>
Montenegro	<i>Vesna Dakovic</i>
Serbia	<i>Tamara Boskovic</i>
Turkey	<i>Serap Hanci</i>
European Commission	<i>Peter Bokor</i>
European Commission	<i>Jeannie Vergnettes</i>
European Commission	<i>Luis Vivas Alegre</i>

EFSA Representatives	
AF Secretariat: <i>Jeffrey Moon; Julia Finger</i>	
<i>Ana Afonso (videoconference)</i>	<i>Stef Bronzwaer</i>
<i>Guilhem De Seze</i>	<i>Barbara Gallani</i>
<i>Mary Gilsean</i>	<i>Juliane Kleiner</i>
<i>George Kass</i>	<i>James Ramsay</i>
<i>Tobin Robinson</i>	<i>Sérgio Potier Rodeia</i>
<i>Hans Verhagen</i>	

Guest Speakers
Jean Charles Cavitte, DG AGRI
Tony Hardy, Chair of the EFSA Scientific Committee

Apologies: Romania, Switzerland and Luxembourg

1. WELCOME AND OPENING OF THE MEETING

Bernhard Url, Executive Director (ED) of the European Food Safety Authority (EFSA) and Chair of the meeting opened the 67th Advisory Forum (AF) meeting in Utrecht, the Netherlands, held as a one-day meeting preceding the Risk Assessment Research Assembly (RARA), taking place on 7 February.

He particularly welcomed Georgi Georgiev, representing Bulgaria and joining the meeting for the first time and guest speakers, Tony Hardy, Chair of the Scientific Committee, and Jean-Charles Cavitte from DG AGRI of the European Commission (EC).

Bernhard noted that the meeting will be the last for Jeannie Vergnettes from the EC, DG SANTE, thanking her for her contribution not only to the Forum, but to the General Food Law from its inception.

2. ADOPTION OF THE AGENDA

The draft meeting agenda was tabled for additional items. An additional item (Update on the EU FORA) was proposed under AOB by EFSA. The agenda was then adopted.

3. MATTERS ARISING

3.a Action Points from last meeting

A summary of the status of the Action Points from the last meeting was circulated prior to the meeting. Bernhard Url noted that the actions have either been completed or are in the process of being addressed, many of them on the agenda of the current meeting.

3.b Correspondence

Bernhard Url informed that the short list of candidates for the renewal of Scientific Panels was circulated to members on 23 January. The appointment of members of the Panels and Scientific Committee is expected to be done at the meeting of the EFSA Management Board (MB) in March.

3.c ED visits

Since the last AF meeting, the ED has visited Italy on 14-15 December. Italy provided a summary of the occasion, explaining that both the Ministry of Health, institution of the Italian AF and the National Health Institute, institution of the Italian Focal Point (FP) was involved in the visit. Main topics discussed were MRA, African Swine Fever and Xylella. Scientific cooperation on national level was explained as well as different projects, in particular the Italian EURAA OneHealth cooperative project on AMR. The visit was followed by a conference on Mycotoxin, jointly organised of the Italian Ministry of Health, the Italian National Health Institute and EFSA.

4. COMMUNICATIONS

Barbara Gallani, Head of the EFSA Communication, Engagement and Cooperation (COMCO) Department, presented an update on activities in the area of EFSA communications, including outputs from the end of 2017 and media highlights as well as details on the EU Insights project for 2018 and the workplan of the Communications Expert Network (CEN). The 70th AF meeting in November in Vienna will be held jointly with the CEN. Barbara also highlighted the article of the ED in the science magazine "Nature" from 24 January relating to trust and science. The article has been circulated to the AF. Barbara concluded with an explanation of the reorganisation of the former Communications and External Relations (COMMS) Department, which will impact on staff dealing with the AF Secretariat. The meeting will be the last for Stef Bronzwaer and Jeff Moon in their current roles and the AF secretariat would be in the new Engagement and Cooperation (ENCO) Unit headed by James Ramsay (ad interim). Italy requested earlier circulation of documents under embargo in order to allow for effective consultation at national level. On a question from France about the approach towards stakeholders, Barbara explained that in 2016 a new approach was introduced for a pilot period of two years, which would be evaluated by the Management Board. France asked for clarification on the scope of possible future social science research. Barbara informed that after many discussions it was decided to establish an EFSA social science function, which is currently under development and could support the secretariat of a social science working group of the scientific committee (SC). The Netherlands remarked that an upcoming challenge will be the communication of uncertainties and a broader discussion about shared values. Barbara noted that this could be a topic for discussion at the joint meeting with the CEN Network in November.

James Ramsay, Acting Head of the Engagement and Cooperation Unit presented the outcome of the first EFSA Reputation Barometer. James explained the methodology of the study: 12 attributes of reputation have been asked to different stakeholder groups through an online survey followed by a number of interviews. An overview of reputation scores for each stakeholder group has been created. EFSA will focus on attributes scored

lowest: the efficiency in RA, meaning the time and way EFSA is producing its Scientific Opinions and EFSA's independence and objectivity. The pilot project will be followed by a detailed stakeholder mapping and a second barometer survey in 2019.

Greece remarked that efficiency in risk assessment could be perceived differently by the different stakeholder groups that participated in the barometer. Belgium added that efficiency is related to budget rules and regulatory limitations, which is not in control of EFSA. France pointed out that efficiency is understood as timelines, not necessarily linked to financial resources. Bernhard Url remarked that EFSA has the responsibility to increase efficiency as an organisation. Comparing input with output in times of shrinking resources lead to the conclusion that the RA process could be done faster, also by means of different methodologies.

Finland emphasised that the results of the reputation barometer describe the perception of different groups, some of them including Risk Managers. Detailed Stakeholder mapping has been done also in Finland years ago, but a simpler way to conduct the exercise would be favourable. However, main question remains on improvements to be made and the framework in which questions are made. Germany asked for internal consequences of the survey regarding governance and mechanisms, emphasising that planning of questions and audience have to be clearly defined before launching the survey. Priorities should be clearly set on the European Parliament (EP), the European Commission (EC) or the consumers. Bernhard explained that the survey focused on EU level. With the EC good relations can be built on, also with the EC but improvements have to be done with the Council, who is also responsible for budget and resources. Austria warned to be careful with interpretation of the results, giving the example of only 5 responses from consumer organisations, which questions the representability. James explained that sample size has been related to numbers on EU level, which in case of EU consumer organisations is only 15. The EC added that in this short time it is impossible to make a change in perceptions, however the overall system is stable. Norway concluded that the outcome of the barometer was not clearly negative, but could serve as a starting point for future surveys and comparison on results. Main focus should be communication to make the public aware what can be expected from EFSA.

5. RESEARCH

George Kass provided an update on the final call of the Horizon 2020 programme and its contribution to EFSA's priorities in the areas of Bee Health, Nanotechnologies and Data Collection, for which members received the respective background document. George emphasized the focussing on the future framework programme 9 (FP9) pointing out that EFSA will provide DG RESEARCH with explanations regarding its priorities. Ireland reminded that the current programme is still open for two years, which should be explored instead of directly jumping to FP9.

Stef Bronzwaer tabled a statement of EFSA and the Advisory Forum in support of Research, in preparation of the Risk Assessment Research Assembly (RARA) taking place and attended by members on the next day. The statement had been drafted by the AF Discussion Group on the EU Risk Assessment Agenda and circulated ahead of the meeting, thus members were asked to agree on its publication coinciding with the event. Stef explained the content of the statement and asked members to agree to publish it as a press statement on the EFSA website, and possibly on their own websites.

Comments from members were taken on board and the revised statement was agreed for publication with a press statement on the EFSA website on the same day.

Jean Charles Cavitte from the EC, DG AGRI provided an overview from the perspective of DG AGRI on research and innovation needs in addressing societal challenges. Jean Charles underlined that the key effort is to establish resilient and sustainable farming and food systems in the long term taking into account climate change and environment as well as

economic growth and jobs and food security. The strategy of DG AGRI builds upon five blocks: resource management, healthier plants and livestock, integrated ecological approaches from farm to landscape, new openings for rural growth and enhancing human and social capital. A number of cross-cutting issues, such as social engagement or socioeconomic research for EU policies have to be taken into account. Jean Charles gave an example for the implementation of the strategy and gave an outlook on the work programme for 2018-2020 and its topics. On remark from Denmark that food security is mentioned, but not food safety, Jean Charles clarified that food security is including food safety as becoming clear from the topics. Stef Bronzwaer acknowledged that often terminology is not so straightforward, resulting also in problems to find the right calls for application, which will also be discussed at the RARA the next day. Spain asked about the collaboration with DG SANTE and its influence on the next work programme. Jean Charles explained that during the draft programme groups of various DGs interested in the societal impact of the programme, are created, receiving the scoping paper and the draft work programme. For the final draft an interservice consultation takes place. In parallel, exchanges with DG SANTE on political support take place periodically. DG SANTE added that the current period leaves significant uncertainty regarding FP9. Bernhard Url concluded that the usability of data is an issue which has to be put to DG RESEARCH, as it is still difficult to use the data that was produced by EU research money.

- *Action Point 1: MS interested to publish the Joint Statement in support of Research on their own website.*

6. RISK ASSESSMENT

As a standing item, MS have notified EFSA on RA activities, which have been reviewed by EFSA Scientific Units. A summary of the latest EFSA mandates has been shared with the AF.

Hans Verhagen pointed out, that as part of EFSA's Transparency initiative, members have also been directed to the Public Consultation planner published on EFSA's web site, detailing upcoming consultations. He particularly highlighted the Scientific Committee guidance on harmonisation of human and ecological risk assessment of combined exposure to multiple chemicals, planned for June and the revised scientific opinion on the TTC, planned for September, adding that these consultations will be open longer than the usual 6 weeks period, due to summer holidays. Hans also emphasized a public consultation on nanotechnologies, precisely on mixture toxicology. Finland remarked that publications during summer time giving MS difficulties to answer. Hans acknowledged that the consultation could start before summer or face a longer period for commenting. Hans asked for details on the mandate in France on contaminants in honey, which France explained being mainly related to residues. Guilhem de Seze highlighted consultations in the area of Pesticides: Guidance documents on risk assessment for amphibians and reptiles planned for June 2018, Guidance on completing RA for active substances of plant protection products that have isomers and for transformation products of active substances that may have isomers, planned for January 2019 and a draft EFSA scientific report on the "FOCUS surface water repair action", also planned for January 2019. He also reminded about the public consultation on the protocol for assessment to establish a cut-off value for intake of "free" sugars that is not associated with adverse health effects, which closes on 4 March 2018. France informed about a joint project called Euromix, underlining that cooperation is aimed at, however the right format has to be identified.

- *Action Point 2: MS interested to cooperate on mixture express interest.*

7. CURRENT ACTIVITIES OF THE SCIENTIFIC COMMITTEE

Tony Hardy, Chair of the EFSA Scientific Committee (SC), informed the AF on the current work programme and its priorities. Tony explained the responsibilities of the SC in its role. In its wider remit the SC spends much time on RA methodology with three key elements:

weight of evidence, biological relevance and uncertainty analysis. The meaning of these terms should be clearer defined and supported by guidance documents.

EFSA guidance documents should be differentiated by types of guidance and life-cycle of guidance documents.

Tobin Robinson provided members with an update on the work programme of the EFSA Scientific Committee and Emerging Risk (SCER) Unit. Tobin focussed on current activities in the area of emerging risks and explained processes, networks of EU agencies and international organisations. Barbara Gallani added the importance of guidance documents, as clear explanations of processes help to communicate in case of public criticism. On question from Spain on collaboration in the area of emerging risks, Tobin expressed interest in projects of MS. DG SANTE asked for the international dimension of the activities mentioned. Tobin explained that EFSA's sister agencies are involved throughout all activities. EFSA is also reaching out to international partners and aims at expanding its network. Bernhard Url added that in 2017 in Beijing a liaison group on methodology in RA has started as an international forum. Tony Hardy underlined the importance of public consultation as part of the process.

8. EVALUATION OF THE GENERAL FOOD LAW (REFIT)

EC, DG SANTE, informed the plenary on the outcome of the evaluation of the general food law (so-called REFIT exercise) and on the reply of the Commission to the recent European Citizens' Initiative on glyphosate where Commission committed to present a legislative initiative on the transparency and sustainability of the EU RA model in the food chain. The REFIT exercise had been concluded by end 2017 and DG SANTE has published the respective report and documentation in January 2018. The reply to the ECI was also published in January 2018. The EC explained both the background to the initiative and the main findings. Issues that arose from the REFIT exercise and the reply to the ECI include the transparency of the EU food safety system in particular in relation to the industry studies used by EFSA in the assessment of regulated products, the sustainability of the EU risk assessment system and risk communications. A Roadmap was launched by end December 2017 for public consultation, which outlines upcoming plans for the introduction by May 2018 of a new legislative proposal to amend Regulation 178, particularly in relation to the issues of transparency, sustainability, governance of the scientific process and risk communication. A questionnaire for public consultation targeted to the areas of revision was launched in January for an 8 weeks period. The questionnaire is open for feedback until 20 March and MS are invited reply and disseminate to stakeholders. Spain welcomed the initiative, as the sustainability of the EU food safety system has been discussed for many years. Regarding the questionnaire, a draft proposal to the AF before May would be welcomed. France questioned political support on the issue of releasing data used in risk assessment and the possibility to have a global risk assessment integrating the sustainability issue. It mentioned the constraints that EFSA faces to produce specific opinions in crisis situations. Finland drew attention to an article written by the Head of Agencies (HoA) in 2012, outlining the lack of clear rules for dialogue and public consultation in relation to risk management (RM) decisions. Hungary, referring to the same paper, underlined that part of the broader issues under discussion derive from risk management lacking methodologies for incorporating issues beyond science in decision making. Denmark commented that RM decisions also have to be seen to be open and transparent. Belgium remarked that an analysis of the wider problem is needed: one issue is that the public shows discontent towards EFSA because of decisions taken by the EC and MS in the area of regulated products. During a round-table event in Belgium in 2010 when it held the EU Presidency, one of the key findings was that science was used as an excuse and often even taken hostage for political purposes, and the situation remains the same today. There is now a democratic debate on the role of science as the arbitrator and Belgium questioned whether the initiative would solve this problem. The EC underlined

that the overall concept of the EU food law and EFSA is not challenged by the legislative initiative being prepared, but certain rules could be refined, for example with regards to public access to data used to assess the safety of regulated products. In this respect, the initiative is designed to make necessary adjustments to the existing situation rather than result in a complete overhaul. With regards to risk communications, this aspect is relevant for EFSA, the EC and MS together. Germany recalled that considerable work from a scientific point of view has been achieved by EFSA over the last 15 years and some analysis should be done on what other factors have changed in the meantime that have led to changes in public opinion. Without giving EFSA new responsibilities to carry out its own research or bringing it within a more political set-up, the options for change are limited. Bernhard Url emphasized that public perception is important and has to be addressed in the EC initiative. Sustainability of expertise is important, including collaboration from Member States. Furthermore, consideration could be given to empowering EFSA to deliver more comprehensive RAs including a form of risk/benefit analysis to improve options for RMs. Finland welcomed this idea.

9. MAPPING OF HUNGARIAN RDI FINANCING DONE FOR STANDING COMMITTEE ON AGRICULTURAL RESEARCH (SCAR) FOOD SYSTEMS SWG

Hungary informed about a project to map MS agricultural research funding mechanisms. Both qualitative and quantitative mapping is planned for the next planning period and should give input to the programme Food 2030. In the first semester of 2017 three countries started a pilot on this mapping: Hungary, Finland and Belgium. Hungary presented the method of both qualitative and quantitative mapping and the results and their evaluation. The exercise has been conducted for the first time, thus no parameters could be consulted. Despite the hurdles to be overcome, the mapping opens future possibilities and advantages for funds for research and for influencing future calls. Germany welcomed the approach, confirming to join the group of MS. As the system strongly depends on indicators, it might be good to merge the mapping with output indicators. Hungary explained that the SCAR had chosen the type of data to be collected. The focus is now shifting to innovation and collaboration of industry and academia but not on scientific outputs. Ireland underlined that the Food 2030 categories have to be looked into this for mapping. Investment goes mainly to public-private partnerships, thus there is a need to look at funding models. Stef Bronzwaer suggested to include FPs in the exercise, if possible upon circulation of a report or results. Hungary explained that no report has been issued, but once the results have been published they will be shared.

- *Action Point 3: Hungary to share results of mapping of RDI financing once published.*

10. FOCAL POINT AGREEMENTS 2019-2022

Sérgio Potier Rodeia provided an overview of the process for reviewing the current FP agreements, as the cycle will close at the end of 2018. The FP network accomplishes 10 years of existence in 2018 and Sérgio highlighted the activities and importance of the network in promoting scientific cooperation. He also outlined the review process for preparing new FP Agreements for the next cycle 2019-2022: an internal EFSA FP Task Force will be set up during February 2018 and present an update of its work at the FP meeting in April. Draft Agreements are expected to be ready by September 2018. After consultation at the 69th AF meeting, they will be approved by EFSA management during November and implemented in December 2018. The review focuses on prioritising the main FP tasks to ensure their relevance for coming years and increase the efficiency of their implementation.

France asked if FPs will be consulted during July and September. Germany asked for a strategic approach to the FP work, as FPs could act as contact points for both scientific issues and crisis situations. Sérgio explained that FPs will also be informed about the

review plan at the upcoming FP meeting in two days. Furthermore they will be consulted on a regular basis until July, including at the 35th FP meeting. Sérgio also confirmed that the information flow regarding crisis situations has been raised in the past as an area where FPs could provide support. This will be taken into consideration during the review process. Spain remarked that FPs are meant to promote scientific cooperation and that care should be taken not to duplicate the tasks of the existing contact points dealing with crisis or emergency situations.

11. EMERGING RISKS MAPPING OF ACTIVITIES IN MS

The identification of emerging risks is a priority topic on the EURAA and the AF has contributed with advice in a breakout session organised during the 62th Advisory forum meeting (8-9/12/16, Parma). A thematic grant topic on the area of methodological development was initiated April 2017 with conclusion expected April 2020. EFSA's Emerging Risks Unit conducted an online survey to map the MS activities for Emerging Risks identification in food and feed. Tobin Robinson presented the outcome of the survey and the next steps. The survey will be reported in the 2017 annual activity report on Emerging Risk activities of EFSA and the survey results will serve as a reference for the DEMETER Project (Determination and Metrics of Emerging Risks). A written publication will also be prepared. Tobin explained the objectives of the DEMETER project as being: The development of new tools for automatic data retrieval and validation from multiple sources for emerging risks identification; the integration of data and methodologies from social sciences into the emerging risk identification process on a farm to fork approach and the setup of a collaborative emerging risk platform to further strengthen EU emerging risks capacity. The mapping of activities in MS aims at gaining a better understanding of the systems in place at MS RA authorities. This is fundamental to avoid unnecessary duplication of efforts and for developing a common information system where all MS, even those with fewer resources, can contribute and benefit.

12. FSA'S FUTURE FOOD SURVEILLANCE SYSTEM

The UK present details of the FSA's future food surveillance system. The FSA has started developing a data-based model to provide intelligence on potential risks that can be further investigated when necessary. The aim is to become more predictive by identifying early signals of risks by analysing multiple data sources. By March 2019 a core service with surveillance capacity should be operational that supports the wider ambition that food is what it is declared to be. This should help to understand risks in safety, authenticity and assurance and identify gaps. It should also drive decision making and prioritisation across FSA and beyond by using evidence-based analytics. An internal and an external network has been created to support the initiative.

13. INTEGRATION OF DATA FROM TOTAL DIET STUDIES IN DIETARY EXPOSURE ASSESSMENTS

Germany gave a presentation on the integration of data from total diet studies in dietary exposure assessments, underlining the need and benefits of a Working Group on total diet studies to identify when to use TDS, how to use TDS and its benefits for RA. Asked by France on the aim, Germany explained that the need for a harmonized approach of MS, as currently different countries come to different results because of different methodologies in TDS, and suggested to set up a discussion group. Hans Verhagen expressed support for the idea. Spain suggested creating the discussion group under the frame of a Scientific Network instead of creating an AF Discussion Group. Bernhard Url agreed to choose a different format than an AFDG.

- *Action Point 4: EFSA to consider DG on total diet studies under Scientific Network on Chemical Occurrence Data*

14. DATA COLLECTION WITH MS – THE WAY FORWARD

Mary Gilson introduced by videoconference the discussion regarding data collection of EFSA with the MS. At the 65th AF meeting Hungary gave a presentation on the possibility to extend and harmonise data collection among MSs using the SSD2 standard followed by feedback from the Heads of National Agencies meeting held in November during the 66th AF meeting. Mary proposed to create a task force on data related issues, composed by AF members and co-ordinated by EFSA. The task force could also address, besides the application of SSD2, the wider issue of food safety data standardisation. Members of the task force could define terms of reference and clear goals which would be presented at the next AF meeting in June. Hungary welcomed the initiative. Austria, Croatia, France, Denmark, Hungary and Norway (tbc) expressed interest to join the task force. Mary proposed to invite DG SANTE as part of the WG. Spain explained that some MS are struggling with SSD2, and asked for more information from EFSA on the pilot on Framework Partnership Agreement on data quality. Mary explained that the pilot is still running, with some delay. Results will be presented to the AF later this year. EFSA is always available to give training to MS on data reporting.

15. EXTERNAL EVALUATION INTERIM REPORT

Juliane Kleiner provided an overview of the main outcomes of the external EFSA evaluation outlining the next steps and timelines. The final report is expected by 29 June 2018. A more detailed discussion is expected at the next AF meeting in June. Juliane explained improvements needed regarding the quality of the report and details on the results in some key questions of the survey. The survey had been distributed to 5351 stakeholders of which a total of 1613 answers have been received.

16. AOB

Renewal of ToR of the Scientific Network on Food Consumption Data:

The ToR of the Network on Food Consumption Data collection had been tabled at the last AF meeting, but following concerns on the proposed changes were reviewed further. Hans Verhagen presented the reviewed ToR confirming that the network has been consulted on the changes. The AF endorsed the ToR.

EU FORA Update

Stef Bronzwaer gave a brief overview on the calls for the EU FORA that closed on 31 January 2018. Both hosting site applications will be evaluated by the evaluation committee and fellow applications by end March. In April the 'matching process' will take place through which each of the 15 highest ranked work programmes will receive two fellow applications for their selection.

Other announcements

Czech Republic invited members to a conference on Novel Foods asking to propose speakers. An official invitation will follow.

Montenegro invited the AF to organise an AF meeting in Montenegro.

Bulgaria welcomed the AF to the next AF meeting in Sofia.

CLOSURE OF THE MEETING

Bernhard closed the meeting with thanks to the presenters, guest speakers and EFSA colleagues who supported the meeting.

SUMMARY OF ACTION POINTS

Action Number	Action
1	MS interested to publish the Joint Statement in support of Research on their own website.
2	MS interested to cooperate on mixture express interest.
3	Hungary to share results of mapping of RDI financing once published.
4	EFSA to consider DG on total diet studies under Scientific Network on Chemical Occurrence Data.

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