

CONSULTATION ON THE FOOD ADDITIVES/ FOOD FLAVOURINGS DATA MODELS

IDATA team

KNOWLEDGE EXCHANGE ON DATA COLLECTION WITH INDUSTRY

New collaborative group composed by industrial companies/representatives and other associations to facilitate the **exchange of information and knowledge** related to different **data collections** such as food additives, food flavourings, and chemical contaminants.

WELCOME

 Food Additives and Food Flavourings Monitoring

- If you are still having issues to access the group in Teams, please contact servicedesk@efsa.europa.eu



CONSULTATION ON THE FOOD ADDITIVES/FOOD FLAVOURINGS DATA MODELS

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Food Additives and Food Flavourings Monitoring

- Consultation on the **Use-Level** and **Negative Presence** (“**Not present on label**”) DM was sent:
 - **via Teams** (20/11/2023)
 - **via email** (08/12/2023)
- **Six - three weeks** to provide comments
- Shared documents:
 - The two draft Guidance
 - Excel files for comments



COMMENTS RECEIVED

- **44 comments** received:
 - 25 Use-level DM (22 Guidance + 3 Excel)
 - 19 Negative presence **“Not present on label”** DM (12 Guidance + 7 Excel)
- From **Der Backzutatenverband e. V.** (Germany), **European Flavour Association (EFFA)**, **European Snacks Association (ESA)**, **FoodDrinkEurope**, **International Organization of the Flavor Industry (IOFI)**, and **North Carolina State University (USA)**



USE-LEVEL DATA MODEL - COMMENTS

- **Use levels guidance targets Industry and MS**
- **Report use levels data (single recipe)** → Use typical use-level element
(minLevel = typicalLevel = maxLevel)
- **Clarifications in some definitions** (e. g. niche product for widelyConsumed)
- **MPLs pre-assignment** (to be implemented in the future)
- **Identification code and record identification code** (assigned by the DP)
- **Restriction/exception** (EC No 1334/2008 will be included)
- **Mandatory to optional if needed** (e. g. year and country of sampling)



USE-LEVEL DATA MODEL - COMMENTS

➤ Presence/Used (onLabel)

This data element indicates whether the FA/FF is used in the reported product

CONCLUS catalogue options:

- 1) Yes, present on the label
- 2) No, not present on the label
- 3) Natural occurrence (mainly analytical data)
- 4) Nutrients

LABELLING:

- Food additives (legal requirement)
- Food flavourings (NO legal requirement)



USE-LEVEL DATA MODEL – PRESENCE/USED (ONLABEL)

CONCLUS catalogue options:

Food additives
(legal labelling)

- 1) Yes, present on the label → **FA indicated on the label**
- 2) No, not present on the label → **FA nonuse in particular food within a food category**
(e. g., citric acid is used in the soft drinks category, but it is not used in a specific soft drink)
- 3) Natural occurrence (mainly analytical data)
- 4) Nutrients

Other options to be included?? Transfer additives, source of nutrients, packaging gases 7



USE-LEVEL DATA MODEL – PRESENCE/USED (ONLABEL)

Food flavourings (NOT legal labelling)

CONCLUS catalogue options:

- 1) Yes, present on the label → **specific FF compound indicated on the label (NOT just “flavourings” on the label)**
- 2) No, not present on the label → **FF nonuse in particular food within a food category**
(e. g., vanilla is used in the soft drinks category, but it is not used in a specific soft drink)
- 3) Natural occurrence (mainly analytical data)
- 4) Nutrients



PRESENCE DATA

Importance of reporting presence data together with use levels data

USE LEVELS Data Model (food category)			
	Food additive	Use result (typical level)	Presence on Label (onLabel)
Product 1	Aspartame	40	Yes, present on the label
	Citric acid	15	Yes, present on the label
Product 2	Aspartame	52	Yes, present on the label
	Citric acid	0	No, not present on the label

Specific products that don't contain the same FA/FF as the ones in the same food category (e.g. soft drinks)



PRESENCE DATA ALONE

- **Positive presence data alone** are not accepted because these data are not be useful for exposure assessment (always linked to an analytical result/use levels)
- However, **negative presence data alone** can be useful to refine dietary exposure:
 - To identify the FA/FF nonuse in particular food within a food category

NEGATIVE PRESENCE (NOT PRESENT ON LABEL) data model: to give the DP the possibility to provide negative presence data alone

This model was detached from the use levels data model due to technical reasons (business rules)



EFSA ASSESSMENT PROCEDURE

- Assessment of all your comments by EFSA
- Guidance will be drafted considering Industry and MS comments
- Draft guidance will be published on Teams by the end of February
(two weeks for final comments)
- Final data models by the 1st of April 2024 → **2025 Pilot data collection**



There is always room for discussion
and improvement



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