



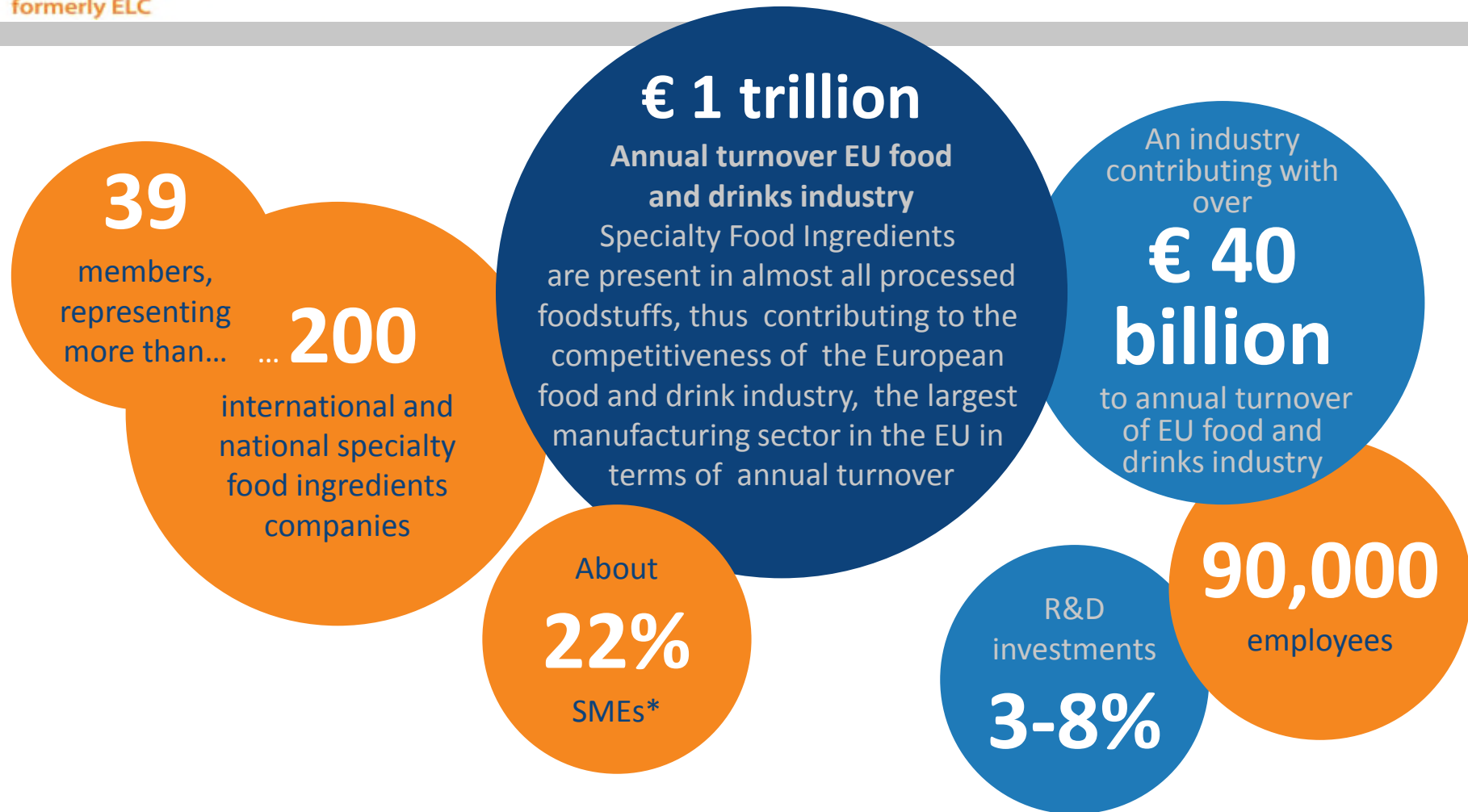
Re-evaluation of food additives

Manufacturers' perspective on the progress in the re-evaluation procedure

- Short presentation of EU Specialty Food Ingredients
- Re-evaluation procedure: what has improved / what could be improved further
- Conclusions

- **Short presentation of EU Specialty Food Ingredients**
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The association of Europe's leading specialty food ingredients manufacturers



* < 250 employees and TO < € 50 m.

These are guesstimates 2013, based on internal data gathering amongst our diverse membership (CEFIC is a member of EU Specialty Food Ingredients but is excluded from calculations due to unclear representation of industrial chemicals vs specialty food ingredients).



What are specialty food ingredients? What are they good for?

Specialty food ingredients offer technological and/or functional benefits: they typically **preserve, texture, emulsify, color and improve the nutritional profile** of processed food

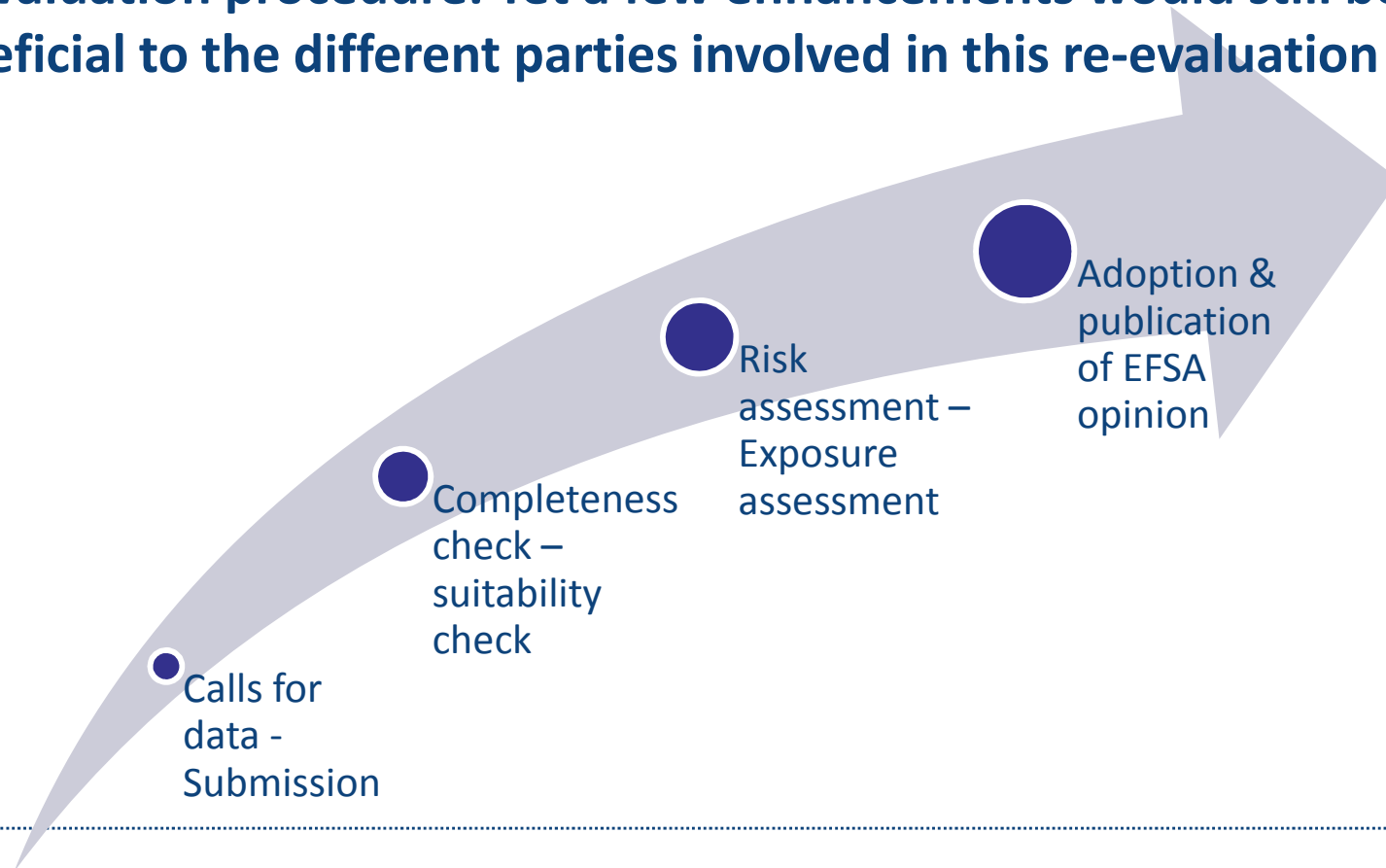


- ✓ Contribute to the **safety and convenience of foods**
- ✓ Contribute to the **sustainability of the food systems**
- ✓ Provide a **technical and market response to public health needs**
- ✓ Contribute to the **competitiveness of the European food and drink industry**

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EU Specialty Food Ingredients has a long record of valuable exchanges with EFSA about the re-evaluation of food additives.

→ The constructive dialogue has led to a progressive improvement of the re-evaluation procedure. Yet a few enhancements would still be beneficial to the different parties involved in this re-evaluation exercise.



What has improved	New opportunities for improvement	Benefit/objective
Publication of an annual tentative work programme	Publication of a tentative annual calendar of upcoming calls for data	Prompter answer to the call Better respect of deadline due to a correct anticipation
Call for interest prior to the call for data for potential coordination among interested respondents duly in place for scientific and technical calls for data.	Call for interest prior to the call for data for potential coordination among interested respondents for calls for usage levels and/or concentration data.	Better consistency in submitted data

What has improved	New opportunities for improvement	Benefit/objective
<p>Reasonable flexibility regarding deadlines for providing requested data (including additional data requested by the WG/Panel from interested parties during the risk assessment)</p>		
<p>Offer for individual on-line training on data submission via the refined additive usage template</p>		
<p>Regular meetings of the Discussion Group on Food Chemical Occurrence Data – valuable platform</p>	<p>2 meetings/year (instead of 1) of the Discussion Group on Food Chemical Occurrence Data</p>	<p>Stronger scientific collaboration</p>

What has improved	New opportunities for improvement	Benefit/Objective
<p>Calls for use levels - Additive usage template</p>	<p>Calls for use levels that also include requests for analytical data shall ask to specify the analytical methodologies used and whether they have been validated for the purpose. Data providers shall also be required to indicate whether the analytical results reflect the natural occurrence of certain components, or whether they have analysed the added amounts. When needed & appropriate, conversion factors shall be specified in the call for use levels.</p>	<p>Better accuracy of data provided</p>

Completeness – Suitability check phase (1)

What has improved	New opportunities for improvement	Benefit/Objective
	Process to be put in place to inform data providers whether the submitted data is appropriate and/or complete (in public calls & further calls for additional information to the data providers)	Early identification of what may be missing, to allow corrective action – Higher efficiency

What has improved	New opportunities for improvement	Benefit/Objective
	<p><u>Extension to data providers of the catalogue of services to applicants:</u> clarification telco/call in case EFSA needs to clarify any outstanding issues on the data submission or when the request for missing information by EFSA <u>during the completeness check</u> is not clear to the data provider.</p>	Improved clarity

What has improved	New opportunities for improvement	Benefit/Objective
	<p><u>Extension to data providers of the catalogue of services to applicants:</u> clarification telco/call at the request from the data provider when the request for additional information by EFSA <u>during the scientific assessment</u> is not clear – Clarification of the scientific rationale of individual questions, ensure understanding of the questions to be answered. Participation of WG experts to telco may be useful depending on the scientific nature of the question.</p>	<p>Improved clarity</p>

What has improved	New opportunities for improvement	Benefit/Objective
	<p><u>Extension to data providers of the catalogue of services to applicants:</u> Applicants hearing – used for the 1st time and only once by ANS WG on re-evaluation in June 2017 (SiO₂) → Call for a consistent use of applicant’s hearings across the Panels & WGs</p>	<p>Efficiency of exchanges, better understanding of expectations, SAVING TIME</p>
<p>Quicker availability of WGs and Panel minutes (15 working days)</p>	<p>15 working days not always observed</p>	<p>Better follow up of the status of the adoption</p>

What has improved	New opportunities for improvement	Benefit / Objective
	<p>Informative reporting of ANS WG meetings. Information about the status of the re-evaluation of a given additive is very poor: minutes of the ANS WG only allow checking if a given additive was discussed and if the discussion will continue at WG level or if the draft opinion is ready to go at Panel level for discussion and/or adoption. It does not provide any information on the reason why e.g. the discussion at WG level may be interrupted over several meetings, or when it will resume.</p>	<p>Anticipation of potential issues → proactivity in providing information, efficiency</p>

What has improved	New opportunities for improvement	Benefit/Objective
<p><u>Exposure assessment</u> Use of Mintel database in addition to EFSA Comprehensive Food Consumption Database</p> <p>Refined intake assessments, using several scenarii (incl. loyal & non loyal brand scenario)</p>	<p>Concept of “occurrence” to be taken into account in the scenarii, in order to avoid in the future that an additive that is allowed to be used in a certain food category, is by default considered to be present in the entire food category. Mintel is one such (probably the best for the moment) tool.</p> <p>Data from other relevant statistical sources should continue to be accepted too.</p>	<p>Accuracy of exposure assessment</p>

What has improved	New opportunities for improvement	Benefit/Objective
<p>Agreement of the interested party is duly checked where confidentiality claims were made, prior to the publication of the opinion where confirmation of format is needed.</p>	<p>To develop (publish?) criteria to determine how the data provided to EFSA is made available to third parties</p>	<p>To increase confidence about handling confidential parts of dossiers To help avoiding the multiplication of preventive submission of dossiers claiming 100 % confidentiality</p>

What has improved	New opportunities for improvement	Benefit/Objective
<p>Before its adoption, the sections of the draft opinion in which information submitted by data providers is reflected may be shared with the data providers so as any errors or omission in data be reported and corrected before the opinion is formally adopted.</p>	<p>Before its adoption, the draft opinion or the sections in which information submitted by data providers is reflected should be shared systematically with the data providers so as any errors or omission in data be reported and corrected before the opinion is formally adopted.</p>	<p>Accuracy</p>

What has improved	New opportunities for improvement	Benefit/Objective
	<p><u>Extension to data providers of the catalogue of services to applicants:</u> Notification e-mail to the data provider on the adoption of the opinion</p>	<p>Better anticipation</p>
<p>Pre-notification of adopted opinion shared with the data provider before the publication on the EFSA website - Under embargo period extended to 36 hours</p>	<p>Longer under embargo period needed, in particular when the data provider is a trade association (need time to reach out to the members & gather their feedback)</p>	<p>Better preparedness in case communication is needed</p>

What has improved	New opportunities for improvement	Benefit/Objective
<p>Better differentiation of risk assessment / risk management in wording used in Opinion' s recommendations: from «<i>the Panel recommended that xxx should be done</i> » to « <i>the Panel recommended that the European Commission considers xxx</i> »</p>		

Adoption & publication of opinions (5)

What has improved	New opportunities for improvement	Benefit/Objective
	<p><u>Extension to data providers of the catalogue of services to applicants:</u> Post-adoption teleconference at the request of a data provider to better understand the scientific rationale of the opinion</p>	<p>Improved understanding</p>
	<p>Right to appeal</p>	<p>Fairness</p>

What has improved	New opportunities for improvement	Benefit/Objective
<p>Communications around a published opinion – example of good fact sheet: nitrates/nitrites</p>	<p>Unclear criteria for decision to issue a web story, fact sheet etc.</p> <p>The data provider should be informed in advance that the opinion will be accompanied by a web story and should receive it for information together with the opinion under embargo.</p>	<p>Better preparedness in case communication is needed</p>

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- The fact that the re-evaluation programme is due to finish by end 2020 with the re-evaluation of sweeteners should not prevent our suggestions to be considered and possibly put in place: it is never too late for the process to be improved!
- Several suggestions go beyond the sole frame of the re-evaluation and can apply to applications, new exposure assessments etc. A key measure is certainly a real use of the mechanism of applicants' hearing by the ANS WGs.

Thank you for organising this workshop!

www.specialtyfoodingredients.eu

info@specialtyfoodingredients.eu