



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

EU Consultation: Food safety – re-evaluation of approved food additives

European Association of Chemical Distributors (Fecc)

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www.fecc.org

Fecc acknowledges the consultation to amend Regulation (EU) No 257/2010 in setting up a programme for the re-evaluation of approved food additives. In this consultation we would like to raise the following points:

1. On data submission - Fecc welcomes the continued approach of the Commission and EFSA to examine data submitted by interested business operators, provided that it is in accordance with the following premises of the articles of this regulation:

Article 5 - That EFSA will allow a reasonable time period for data collection for food additives under safety re-evaluation, and its reaction and fate in food.

Article 6 - That EFSA continues to make the request for additional information well in advance for better alignment between EFSA, business operators, the Commission and other concerned parties.

2. On EFSA opinions and pre-submission advice - Fecc supports the Article 7a and 7b amendments and we encourage the Commission to take into account the following:

Article 7a - We support the 7a amendment that stakeholders may request EFSA to further collect data in order to complete safety assessment.

Article 7b - With regards to pre-submission advice, Fecc supports the 7b amendment that business operators may request that EFSA provides advice on the rules or recommendations.

3. On Commission recommendations post EFSA assessment - Fecc also requests the Commission to provide clear recommendations in terms of action points in the event that the EFSA safety assessment concludes no significant risks due to insufficient data. This is paramount in order to ensure that both safety and regulatory alignment is maintained, should EFSA be unable to confirm the safety of a food additive in its preliminary opinions.

4. On Commission compliance with the Union list of approved food additives - Fecc also requests the Commission, through the information gained from EFSA's advice, to provide a reasonable transition period for business operators in the event of the following scenarios:

- When a food additive must be removed in the Union list of approved food additives.
- When a non- food additive substance (enzyme, colourant, carrier) is classified as a food additive under the European Commission MEMO/11/783 definition of the term.
- When a food additive is already available on the market prior to an EFSA safety assessment, and provided that the safety assessment concludes no significant risks.

As the association that represents food and food ingredient distributors, most of which are SMEs, we believe that food safety and a sound, consistent regulatory framework go hand-in-hand. We would be happy to engage further with the Commission in the pursuit of sustainable, future-oriented solutions in this area.

To access the Fecc's response on the EU Commission's website, please [click here](#).