



# EU Consultation: Streamlining Scientific Assessments

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[www.fecc.org](http://www.fecc.org)

Fecc acknowledges the consultation for the upcoming initiative on streamlining scientific assessments ([link](#)). At the same time, we would like to raise the following points in this consultation:

**1. Risk assessment should be maintained at the corresponding level of expertise for each agency.** Many of the products assessed are subject to a pre-market authorisation that implies the assessment of their safety for human consumption by the EFSA. Some of these ingredients are also used for non-food purposes and may undergo various streams of safety assessment by other EU agencies like EMA and ECHA. While various EU and national agencies play an integral role to advise and provide input, risk assessment should, however, remain for food and feed ingredients should remain in the remit of EFSA, owing to the scope and expertise of the authority in oral exposure assessment and guidance documents that consider the specifics of oral ingestion and the related end points etc.

**2. Manpower and the financial means of Member States should be consistent.** Pursuant to Commission [Regulation \(EC\) No 1881/2006](#), Member States are requested to examine samples and provide necessary data that could lead to a comprehensive risk assessment. Despite the European scope of the risk assessment, means to support such data collection is still largely maintained at a Member State level, which may lead to national authorities providing data with too much variability. Fecc sees this initiative on streamlining scientific assessments as an opportunity for the Commission to support the integral role that national authorities and European Reference Laboratories do to ensure the conclusions taken from these studies and guidance documents are as robust as possible.

**3. The role of the industry in this initiative must be clearly defined and supported.** Fecc advocates for a long-term supply chain and business model that is resilient, most especially with the current political atmosphere post-COVID, post-Brexit and supply chain disruptions due to the Russian war in Ukraine. Community support must embrace a broader sector of the industry to ensure that safe and sustainable products are valued. Due to overlapping requirements, the expense to producers and distributors is a major concern for the European wholesale sector. Fecc requests the Commission to consider the effects of these overlaps on the level playing field for industry, for SMEs, with the target to clear them to reduce complexity in line with the Commission's Better Regulation agenda.

As the association representing chemical, food and active pharmaceutical ingredients distributors, most of which are SMEs, we believe that product safety and a sound regulatory framework go hand-in-hand. We would be happy to engage further with the Commission to pursue sustainable, future-oriented solutions in this area.

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