

ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES

APPROACH FOR OPENNESS IN THE ACNFP'S ASSESSMENT OF TRADITIONAL FOOD NOTIFICATIONS.

Issue

At the last meeting of the ACNFP considered the question of the openness of the assessment of traditional foods notifications. A proposed approach has been identified by the Secretariat. The Committee's input is requested so that this can be refined with a view to putting this into practice for future traditional food applications.

Background

The UK as a Member State has the opportunity under the Novel Foods Regulation (2015/2283 EU) to respond within a four-month period to notifications for traditional foods from third countries. Submission of reasoned safety objections by any one Member State would result in a further application being required of the applicant to address the concerns raised. If no safety objections are raised the food is authorised and added to the Union List of novel foods. The advice of the ACNFP is used by the Food Standards Agency to inform the decision on whether safety objections should be made for the food under assessment.

Following on from the discussion with members at the last meeting of the ACNFP, the Secretariat has been exploring how to put into place a system for making public and consulting on the proposed advice from the ACNFP to the FSA on traditional foods notifications. This is to maintain the Committee's principle for openness and transparency and to provide an opportunity to highlight new information for consideration by the Food Standards Agency in responding to the notification.

A proposed approach has been developed and the views of the Committee are welcomed to ensure that it is in line with the Committee's ethos and assessment approach.

The proposal is being discussed with our information management experts and communications colleagues to ensure that it is in line with wider Food Standards Agency policy on these issues.

The proposal

In line with the previous discussions with the Committee on openness it is suggested that following the Committee's discussion of a traditional food notification the Secretariat will prepare a short summary of the advice of the Committee. The draft would be cleared with the Committee by correspondence and signed off by Chair's action, prior to issuing a consultation.

The summary would be placed on the ACNFP website for a 10-day consultation period. The consultation would invite comment on additional issues that the Committee should be aware of as well as any information or reflections that stakeholders could provide to address the three pillars of the novel food assessment of safety, ensuring consumers are not misled or put at a nutritional disadvantage.

The period of 10 days was selected to be consistent with the consultation under the old regulations for the opinion of the Committee. It would also ensure the ACNFP advice remains timely given the short period for input into the wider consideration of these foods.

The responses to the consultation and any changes to the summary would be sent to the Chair for final agreement. The summary would be in addition to the minutes that would be subject to agreement at the next ACNFP meeting.

Example summary

An example of the type of summary using the Haskaps dossier from the last meeting has been prepared below to provide a basis for discussion.

*At the 133rd meeting of the Advisory Committee on Novel Foods and Processes (ACNFP) the traditional food from a third country notification dossier for Haskaps or honeyberries (*Lonicera Caerulea*) was considered. These are small blue fruits, traditionally consumed in Japan. The applicant intends to sell the berries as whole fresh fruit or as whole fruit frozen. The summary of the application can be viewed on the [Commission website](#).*

The advice of the Committee to the Food Standards Agency is summarised below. Please note the Committee did not consider any potential health benefits from consuming the food as the focus of the novel food assessment is in relation to ensuring the food is safe, not misleading and not putting consumers at a nutritional disadvantage.

The Committee raised concerns that the dossier had not provided full information in line with the EFSA guidance for traditional food notifications, which made a full assessment of the potential risks difficult. While no specific causes for concern were identified it was unfortunate that a fuller literature review had not been performed. This could have provided further information to support the assessment and provide reassurance that the relevant food safety risks had been identified and managed.

It was suggested that further information on the composition for multiple batches of the fruit would have been useful to support a robust specification. This was felt to be important to take into account variation in composition of the fruit when grown in different geographical locations such as Europe, Hokkido or in North America.

The Committee commented that a potential risk for this product would be pesticide residues. It was noted that this had been considered by the applicant

and that there were levels set for pesticide residues for Haskaps which are similar to other fruits like blueberries.

The Committee noted that a shelf life for the product has been proposed but there is no explanation on how this was estimated. The 18-month shelf life would be consistent with a frozen product but the evidence to support this could have been clearer.

An in-depth discussion was held on the potential for an allergenicity risk associated with the fruit. Members suggested that previous allergies to the fruit were not identified from literature. The potential for cross reactivity for those with other fruit allergies was considered and it was noted that the food was not highly related to other known fruit allergens. The potential for allergic reactions could not be ruled out but was not considered an issue that needed to be investigated before marketing in this case.

The Committee concluded that there were concerns that the information provided in the dossier was not complete and this should be flagged to support the improvement of future traditional food notification dossiers. No significant concerns were identified that would suggest that the product would not meet the criteria for authorisation under the Novel Food Regulation.

Committee Action Required

- To consider the proposal for consulting on the ACNFP's advice on traditional foods.
- To comment on whether the approach meets the Committee's needs and is appropriately balancing the commitment to openness while meeting their wider responsibilities for data protection.

**Secretariat
June 2018**