



COMMISSION WHITE PAPER ON FOOD SAFETY

FVE COMMENTS

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FVE welcomes the intention of the European Commission to develop a European Food Safety policy to strengthen consumer safety and supports the proposal to establish a European Food Authority (EFA).

FVE recognizes the need for independent, excellent and transparent scientific work and scientific risk assessment in the field of food safety and agrees that a specific body needs to be established in the European Union for that purpose.

FVE however stresses that the value of such a body should not be overestimated and that the main focus should be on ensuring that Member States have the necessary human and financial resources to ensure the implementation of the existing European legislation.

FVE therefore considers that the proposed EFA would be one element to guarantee a high level of food safety but that it would not be the most important one.

FVE believes instead that only appropriate control systems, especially at the level of the primary production, as well as the implementation of a 'stable to table' approach to food safety with traceability and two-way communication throughout the food chain, can guarantee a high level of consumer safety.

Tasks of the EFA

FVE supports the principle that the EFA should be responsible for risk assessment and risk communication of food related public health concerns and that the European Commission should take responsibility for risk management.

FVE is convinced that risk communication is an essential part of any food safety policy and can only stress the importance of consumer education. FVE would therefore support a proactive role of the EFA in that respect, a role, which should even go beyond risk communication and should for instance, include consumer education on hygiene rules and food safety.

FVE always supported the principle of a 'stable to table' approach to food safety and therefore welcomes the inclusion of animal health and welfare amongst the tasks of the EFA, as animal health and welfare have a direct impact on both the quality and the safety of food.

Sections

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FVE noted that the scientific evaluation of dossiers submitted by the industry for Community authorisation of feed additives, novel foods or GMOs is not included in the tasks of the EFA.

FVE is concerned that this scientific evaluation should remain in the competence of Committees under the responsibility of the Commission services, as it would otherwise result in:

- a duplication of resources as the very same experts might be called upon by the EFA to carry out a general risk assessment and by the Commission services to review an application received for a specific product; and would entail a
- risk of diverging opinions between the EFA and the Commission committees, that could undermine the authority of the EFA and the confidence of consumers in the excellence of its work.

FVE therefore recommends that the scientific evaluation for product approval should be handed over to the EFA.

FVE fully supports the view that the EFA should be the Community central point for food safety monitoring and surveillance programmes. Such programmes should include the monitoring of food-borne diseases, of zoonosis and of environmental contaminants, such as residues of drugs and pesticides, heavy metals and radioactivity, which may have an impact on food safety.

FVE agrees that the EFA should operate the Rapid Alert System.

FVE recommends that the respective roles of the EFA, of the European Commission and of Member States in crisis management and crisis communication be clarified. This point is indeed not covered in the Commission white paper although there would be an obvious need for a close co-operation between the EFA and Member States in the case of a crisis, especially regarding communication.

Membership of Scientific Committees

FVE considers that the membership of the Scientific Committees should be as flexible as possible to allow for the introduction of evidence and opinion from the most qualified experts on particular subjects.

Also, FVE believes that membership of the committees should not be confined to academics or to a selected group, who are expected to demonstrate expertise on a wide range of subjects.

FVE therefore sees it as essential for the EFA to build close working relationships with European interest groups allowing two way communication and in addition that *stakeholders are able to contribute to the overall development of the portfolio expertise*, as recommended in the report by Professors Pascal, James and Kemper on 'The future of scientific advice in the EU'.

FVE supports the view that the EFA should *establish means for the rapid identification of experts*.

FVE fully agrees that independence, excellence and transparency must be the guiding principles of the Authority, of its Scientific Committees and of the scientific experts involved.

FVE however considers that the observation of these principles must be open to public scrutiny but that a transparency policy can not limit itself to the internet release of agendas, minutes and opinions of committees.

FVE therefore fully endorses the recommendation of the report by Professors Pascal, James and Kemper on 'The future of scientific advice in the EU' that *not only should stakeholders be involved in the Board but they should also be able to attend meetings of the Scientific Committee members as observers.*

Networking with national food agencies and scientific bodies

FVE recommends that the relationships between the EFA and national food agencies be defined unambiguously, if the EFA is to establish itself as the authoritative point of reference for consumers, the food industry, Member States authorities and on the wider world stage.

FVE considers that in this respect, risk assessments, which have a Community dimension or which may affect Community interests, should be automatically referred to the EFA.

Interface with Commission Services

FVE agrees that the FVO and the Joint Research Center should remain outside the proposed EFA but work closely with it.

Role of the EFA in international bodies such as CODEX, OIE

FVE recommends that the EFA should be mandated to co-ordinate the scientific input of the European Union in international organizations such as CODEX or OIE.

EFA resources

FVE considers that the EFA should be publicly funded. However, if the EFA is involved in product approval, part of the EFA budget should be raised from full-recovery fees to be paid by the food industry when applying for the approval of their products.