

EuropaBio Position Paper

EuropaBio welcomes the package of proposals for new legislation on food additives, flavourings and enzymes.

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EuropaBio, the European Association for the Bioindustries, welcomes the Commission's proposals for Regulations on Food Additives [COM (2006) 428 final], Food Enzymes [COM (2006) 425 final], Food Flavourings [COM (2006) 427 final] and a Common Authorisation Procedure [COM (2006) 423 final], which seek to streamline EU legislation with regard to the safety requirements for food improvement agents.

EuropaBio, and especially its Industrial Biotechnology Council, supports the positions taken by the Association of Manufacturers and Formulators of Enzyme Products (AMFEP)¹ and the Federation of European Food Additives, Food Enzymes and Food Cultures Industries (ELC)² in this field.

In particular, we strongly support the Commission's proposal to **introduce Comitology as the new authorisation procedure** for Food Additives, Food Enzymes and Food Flavourings. Comitology is widely accepted as the most effective procedure for adopting technical amendments to EU legislation. In fact, food additives legislation is currently the only area of food law where the approval for use of a substance requires the co-decision procedure. Updating the positive list of approved food additives can, at present, take several years due to the length of the co-decision procedure (this applies to both newly approved food additives and the withdrawal of authorisation of food additives).

Reducing the "time to market" is essential if we want to develop a sustainable and competitive industry in Europe. Therefore efforts should be made to reduce the number of months foreseen for the authorisation procedure, and sufficient resources should be available at EFSA to minimise the time needed for a scientific evaluation.

EuropaBio wishes to see further clarification of the provisions concerning the relationship between the proposed regulations and Regulation 1829/2003 on genetically modified food and feed. In particular, EuropaBio considers it important to avoid duplicative safety assessments and approval procedures for additives, enzymes and flavourings already included in the scope of applications and authorizations of Regulation 1829/2003.

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¹ http://www.amfep.org/common/documents/AMFEP_Statement_FIAPproposal_SEPTEMBER2006.pdf

² http://www.elc-eu.org/PDF/ELC_Amfep_CIAA_joint_position_on_comitology.pdf



About EuropaBio

EuropaBio, the European Association for Bioindustries, has 75 corporate and associate members operating worldwide and 24 national biotechnology associations representing some 1500 small and medium sized enterprises involved in research and development, testing, manufacturing and distribution of biotechnology products.

<http://www.europabio.org>

For further information about the Commission's proposals for new legislation on food additives, flavourings and enzymes:

http://ec.europa.eu/food/food/chemicalsafety/additives/prop_leg_en.htm