EU specialty food ingredients

EU legislative developments with focus on food additives & Farm-to-Fork strategy

Maryse Hervé – TIA Europe conference, 24-25 October 2023, Munich

Content

- Introduction to EU Specialty Food Ingredients
- EU legislation on food additives – recent and on-going developments
- Farm to Fork strategy – a game changer?

Content

- **Introduction to EU Specialty Food Ingredients**
- EU legislation on food additives – recent and on-going developments
- Farm to Fork strategy – a game changer?

Our Contribution

Specialty food ingredients are present in almost all processed foodstuffs, thus contributing to the competitiveness of the European food and drink industry → EU food and drinks industry annual turnover: **€ 1 trillion,** making it the largest manufacturing sector in the EU in terms of annual turnover.

Specialty food ingredients have technological and/or functional benefits that are essential in providing today's consumer with a wide range of tasty, safe, healthy, affordable, qualitative and sustainably produced foods.

The industry contributes over **€ 40 billion** to annual turnover of EU food and drinks industry

The industry invests **3-8%** of turnover in R&D (depending on sector)

Position in the food value chain

Specialty Food Ingredients, essential to today's varied Food & Drink offer

Shopping Basket
(with and without specialty food ingredients)

Shopping Basket
(without specialty food ingredients)

Membership

45
members, representing more than…

… 200
international and national specialty food ingredients companies

About
22%
SMEs*

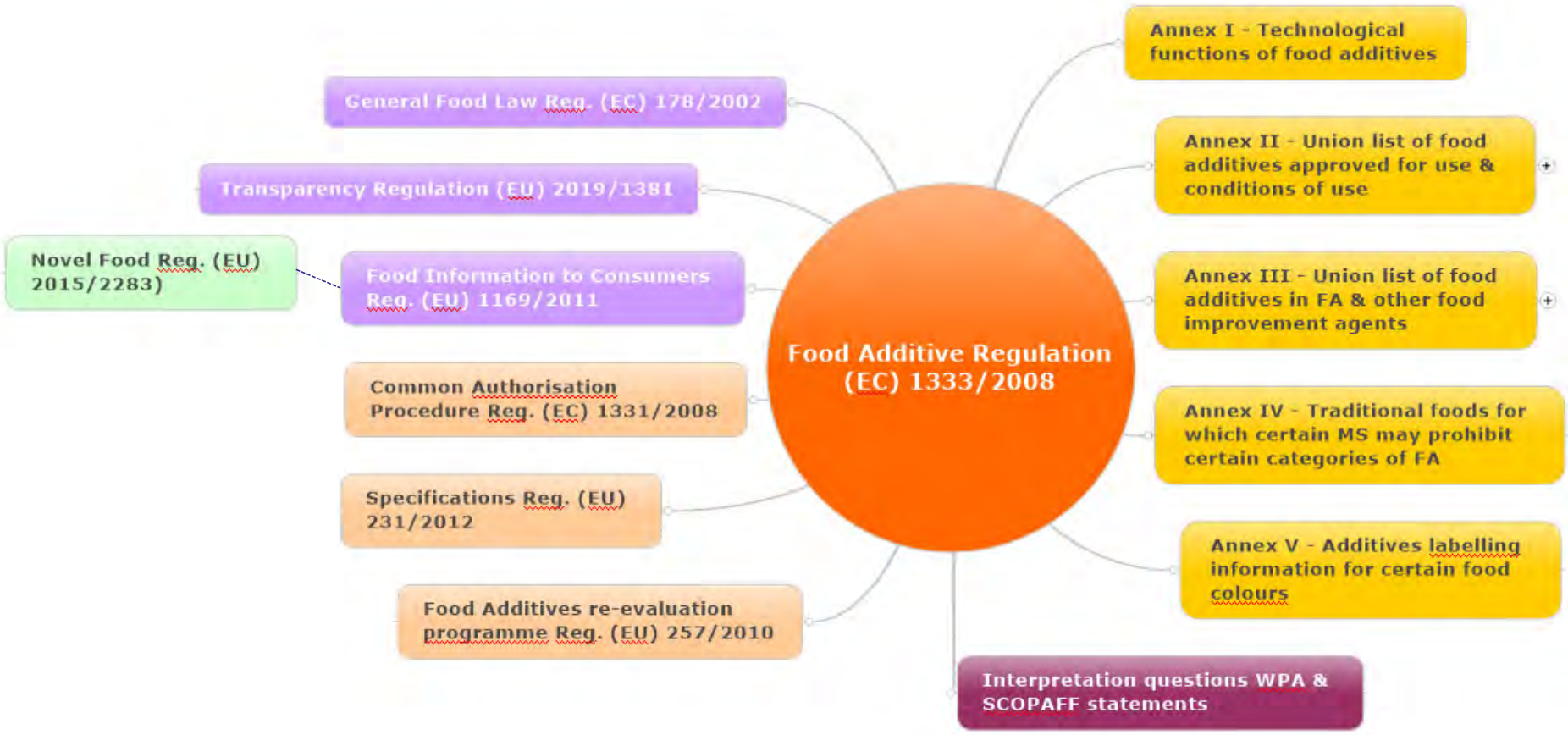
*< 250 employees and TO < € 50 m.
These are guesstimates 2013, based on internal data gathering amongst our diverse membership (CEFIC is a member of EU Specialty Food Ingredients but is excluded from calculations due to unclear representation of industrial chemicals vs specialty food ingredients).

Content

- Introduction to EU Specialty Food Ingredients
- **EU legislation on food additives – recent and on-going developments**
- Farm to Fork strategy – a game changer?

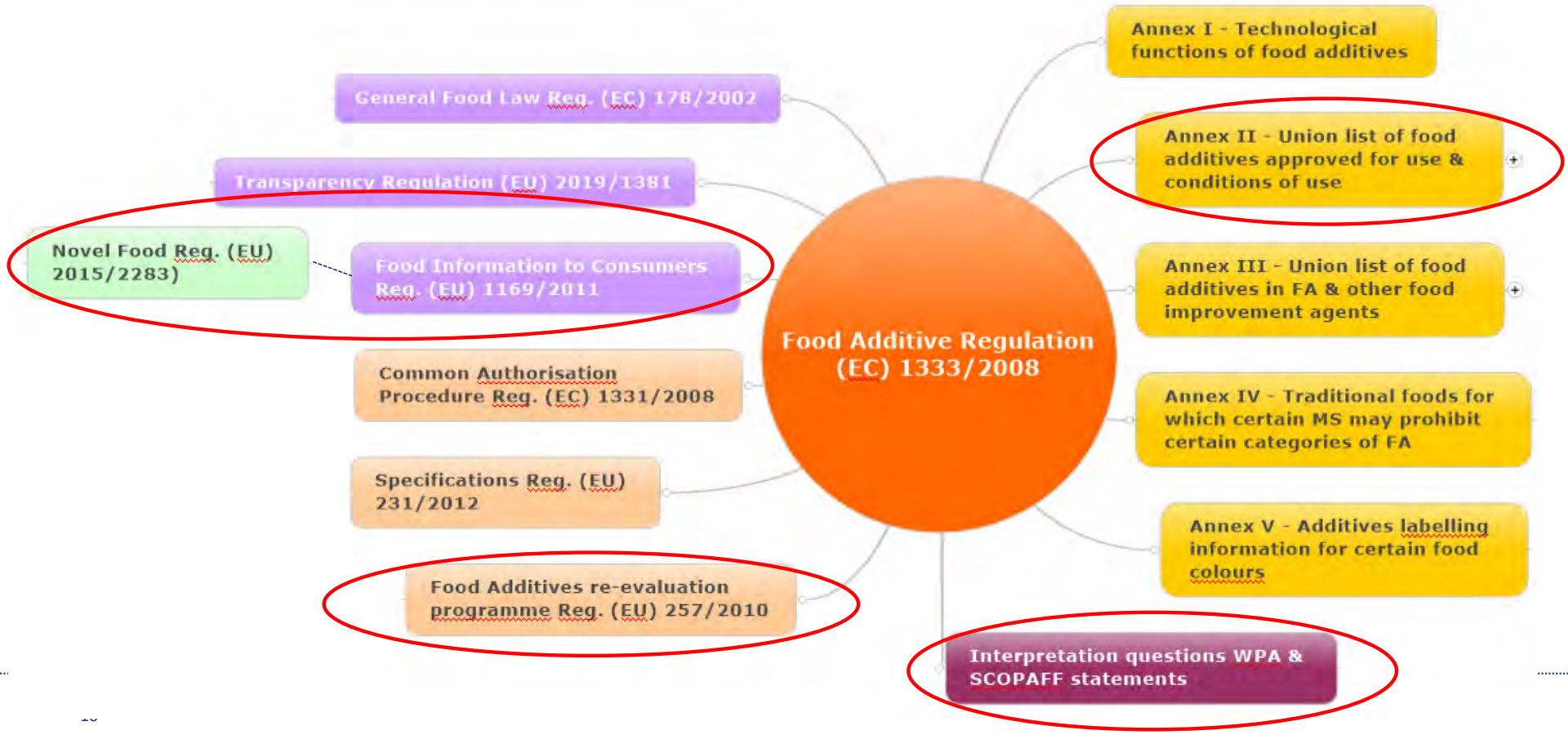
The EU legislative landscape for food additives

Overview



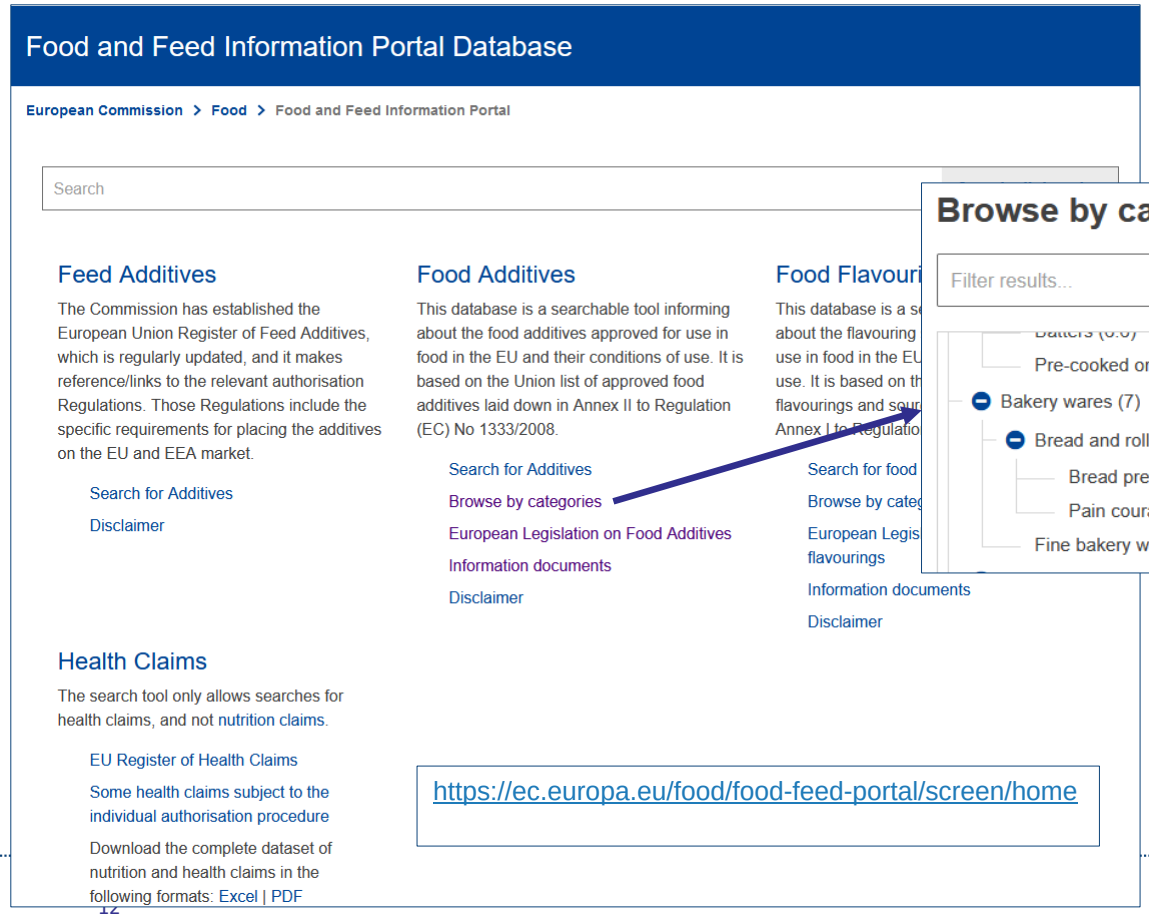
The EU legislative landscape for food additives

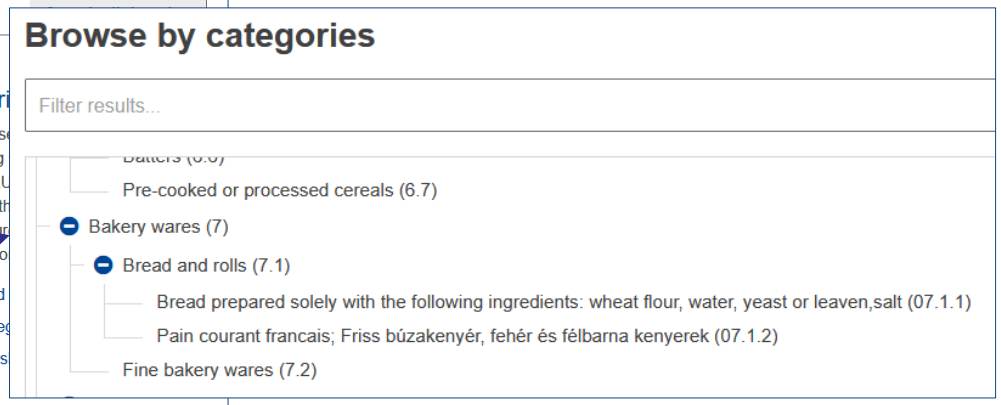
Today's focus



List of FA approved for use & conditions of use

List of FA approved for use & conditions of use
Current status (1)





https://ec.europa.eu/food/food-feed-portal/screen/home

List of FA approved for use & conditions of use
Current status (2)

2012
Industry consulted by COM on draft descriptors

VERSION 1
DOES NOT NECESSARILY REPRESENT THE OFFICIAL VIEWS OF THE COMMISSION

18 December 2013

Guidance document describing the food categories in Part E of Annex II to Regulation (EC) No 1333/2008 on Food Additives

VERSION 6
DOES NOT NECESSARILY REPRESENT THE OFFICIAL VIEWS OF THE COMMISSION

November 2022

Guidance document describing the food categories in Part E of Annex II to Regulation (EC) No 1333/2008 on Food Additives

List of FA approved for use & conditions of use
Current status (3)

No change since Version1

7.	**Bakery wares**
	This category covers products which are prepared mainly with cereal flour or cereals and may have undergone a treatment, e.g. baking, steaming, extrusion. Includes categories for bread and ordinary bakery wares (7.1) as well as sweet or salty fine bakery wares (7.2). Ready-made dough can be included in each subcategory.
7.1.	Bread and rolls
	This category covers all ordinary bakery wares like bread (e.g. wheat bread, rye bread, whole meal bread, multi grain bread, malt bread, pumpernickel bread), rolls (hamburger rolls, whole wheat rolls, milk rolls), bagels, pita bread, Mexican tortillas and steamed breads. This category includes bread-based products, e.g. croutons, bread stuffing, prepared dough (excluding pre-dusts, and doughs which are covered by category 6.6).

List of FA approved for use & conditions of use
Current status (4)

7.1.1.	Bread prepared solely with the following ingredients: wheat flour, water, yeast or leaven, salt
7.1.2.	*Pain courant français*; *Friss búzakenyér*, *Fehér és Félbarna kenyerek*
	Pain courant français: Bread prepared essentially with the following ingredients: bread-making flours (wheat flour, rye flour, meslin flour), water, yeast and/or leaven, salt. Other food ingredients can be added for a technological purpose in accordance with the national general principles. *Fehér kenyerek*: White bread, consisting of 100% of wheat-flour, produced with yeast or yeast substitute, manufactured through kneading, forming, rising and baking of the dough; *Félbarna kenyerek*: Semi-white bread, consisting of 85% semi-white wheat-flour and 15% light rye-flour, produced with yeast or yeast substitute, manufactured through kneading, forming, rising and baking of the dough.

List of FA approved for use & conditions of use
Current status (5)

7.2.	Fine bakery wares
	This category covers sweet, salty and savoury products such as cookies, cakes, muffins, doughnuts, biscuits, macarons (i.e. round products made typically with almonds, icing/powdered sugar and egg whites), rusks, cereal bars, pastries, pies, scones, cornets, wafers, crumpets, pancakes, gingerbread, éclairs, croissants, as well as unsweetened products such as crackers, crisp breads and bread substitutes, including prepared doughs* [or mixes for their preparation*]. It also includes sponge cakes, essoblaten and wafer paper and edible paper ('edible paper' does not refer to a paper but to a food placed on the market under the name 'edible paper' usually consisting of dried starch sheets or made of rice or potato starch of various thickness or texture and consumed as such). In this category a cracker is a dry biscuit (baked product based on cereal flour), e.g. soda crackers, rye crisps, matzo. Decoration, coatings and fillings for fine bakery wares are covered by the appropriate category based on the character of the decorations, coatings and fillings, e.g. by FC 05.4, 04.2.5. * the use levels apply to the final product

List of FA approved for use & conditions of use
Current status (6)

Bread and rolls (7.1)

This category covers all ordinary bakery wares like bread (e.g. wheat bread, rye bread, whole meal bread, multi grain bread, malt bread, pumpernickel bread), rolls (hamburger rolls, whole wheat rolls, milk rolls), bagels, pita bread, Mexican tortillas and steamed breads. This category includes bread-based products, e.g. croutons, bread stuffing, prepared dough (excluding pre-dusts, and doughswhich are covered by category 6.6).

Additives linked to this subcategory:

E no.	Additive Name	Maximum limit restrictions / exceptions
Group I	Group I, Additives	ML = quantum satis except E 425 ML = 10000 mg/kg E 620 to E 625, ML = 10000 mg/kg individually or in combination, expressed as glutamic acid E 626 to E 635, ML = 500 mg/kg individually or in combination, expressed as guanylic acid. except products in 7.1.1 and 7.1.2
E 150a-d	Caramels	quantum satis only malt bread
E 200 - 202	Sorbic acid - potassium sorbate (SA)	ML = 2000 mg/kg, only prepacked sliced bread and rye-bread, partially baked, prepacked bakery wares intended for retail sale and energy-reduced bread intended for retail sale
E 280 - 283	Propionic acid - propionates	ML = 1000 mg/kg, only prepacked bread ML = 2000 mg/kg, only energy-reduced bread, partially baked prepacked bread, prepacked rolls, tortilla and pitta, prepacked polsebrod, boller and dansk flutes ML = 3000 mg/kg, only prepacked sliced bread and rye bread
E 338 - 341, E 343 and E 450 - 452	Phosphoric acid - phosphates - di - tri- and polyphosphates	ML = 20000 mg/kg, only soda bread
E 450	Diphosphates	ML = 12000 mg/kg, only refrigerated, prepacked yeast based doughs used as basis for pizzas, quiches, tarts and similar products
E 481 - 482	Sodium and Calcium stearoyl-2-lactylates	ML = 3000 mg/kg, except products in 7.1.1 and 7.1.2
E 483	Stearyl tartrate	ML = 4000 mg/kg, except products in 7.1.1 and 7.1.2
E 450 (ix)	Magnesium dihydrogen diphosphate	ML = 15000 mg/kg, only pizza dough (frozen or chilled) and *tortilla*

List of FA approved for use & conditions of use
Current status (7)

Bread prepared solely with the following ingredients: wheat flour, water, yeast or leaven,salt (07.1.1)

Bread prepared solely with the following ingredients: wheat flour, water, yeast or leaven, salt

Additives linked to this subcategory:

E no.	Additive Name	Maximum limit restrictions / exceptions
E 260	Acetic acid	quantum satis
E 261	Potassium acetates	quantum satis Period of application: From 6 February 2013.'
E 262	Sodium acetates	quantum satis
E 263	Calcium acetate	quantum satis
E 270	Lactic acid	quantum satis
E 300	Ascorbic acid	quantum satis
E 301	Sodium ascorbate	quantum satis
E 302	Calcium ascorbate	quantum satis
E 304	Fatty acid esters of ascorbic acid	quantum satis
E 322	Lecithins	quantum satis
E 325	Sodium lactate	quantum satis
E 326	Potassium lactate	quantum satis
E 327	Calcium lactate	quantum satis
E 471	Mono-and diglycerides of fatty acids	quantum satis
E 472a	Acetic acid esters of mono- and diglycerides of fatty acids	quantum satis
E 472d	Tartaric acid esters of mono- and diglycerides of fatty acids	quantum satis
E 472e	Mono and diacetyl tartaric acid esters of mono- and diglycerides of fatty acids	quantum satis
E 472f	Mixed acetic and tartaric acid esters of mono- and diglycerides of fatty acids	quantum satis

List of FA approved for use & conditions of use
Current status (8)

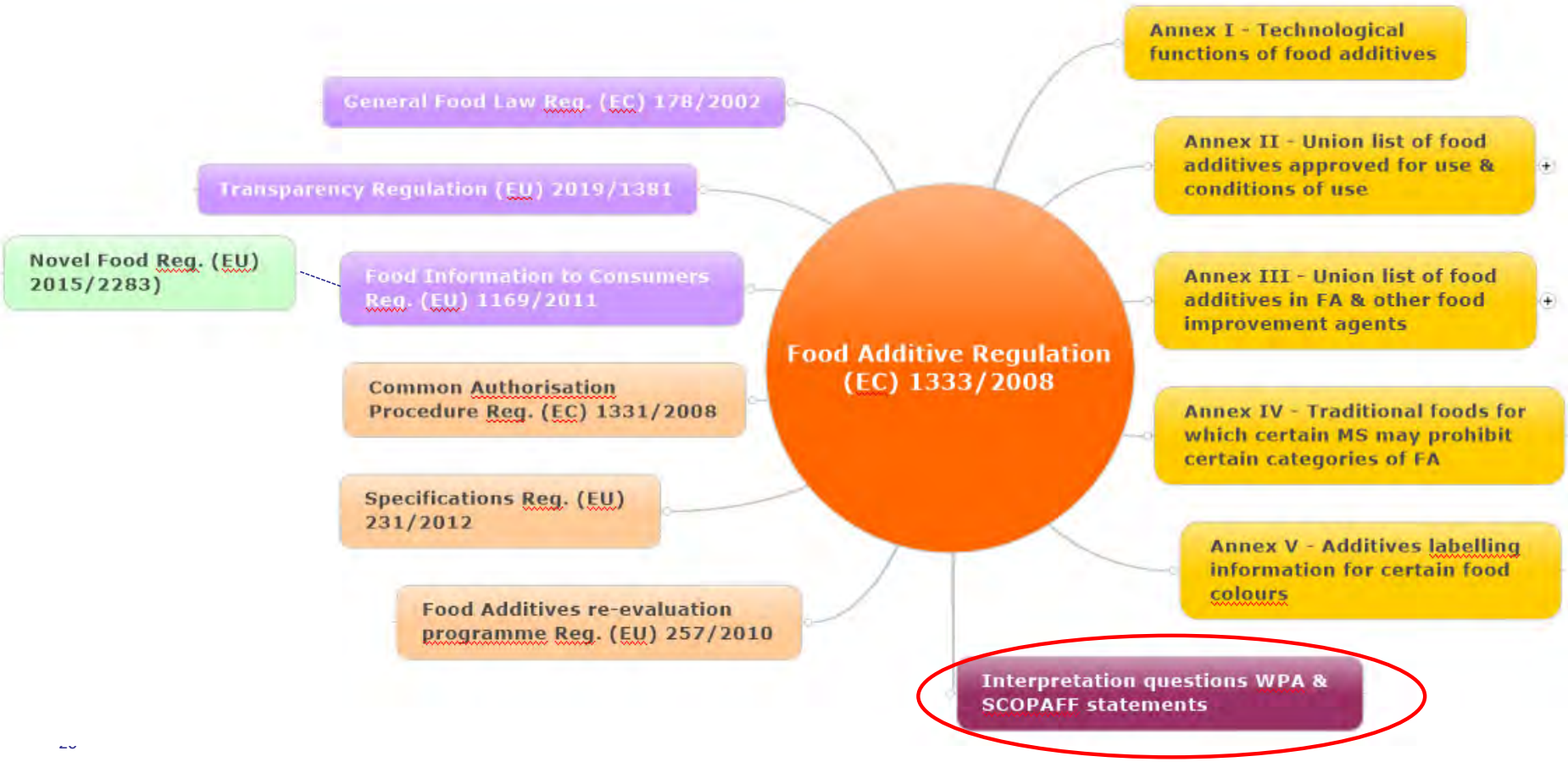
Bread prepared solely with the following ingredients: wheat flour, water, yeast or leaven,salt (07.1.1)

Bread prepared solely with the following ingredients: wheat flour, water, yeast or leaven, salt

Additives linked to this subcategory:

E no.	Additive Name	Maximum limit restrictions / exceptions
E 260	Acetic acid	quantum satis
E 261	Potassium acetates	quantum satis Period of application: From 6 February 2013.'
E 262	Sodium acetates	quantum satis
E 263	Calcium acetate	quantum satis
E 270	Lactic acid	quantum satis
E 300	Ascorbic acid	quantum satis
E 301	Sodium ascorbate	quantum satis
E 302	Calcium ascorbate	quantum satis
E 304	Fatty acid esters of ascorbic acid	quantum satis
E 322	Lecithins	quantum satis
E 325	Sodium lactate	quantum satis
E 326	Potassium lactate	quantum satis
E 327	Calcium lactate	quantum satis
E 471	Mono-and diglycerides of fatty acids	quantum satis
E 472a	Acetic acid esters of mono- and diglycerides of fatty acids	quantum satis
E 472d	Tartaric acid esters of mono- and diglycerides of fatty acids	quantum satis
E 472e	Mono and diacetyl tartaric acid esters of mono- and diglycerides of fatty acids	quantum satis
E 472f	Mixed acetic and tartaric acid esters of mono- and diglycerides of fatty acids	quantum satis

Interpretation questions & SCOPAFF statements



Interpretation questions

WP of governmental experts on Food Additives – 21-22/06/2018 & 06/09/18

Phosphates in tortilla

WGA 18 03 concluded that tortilla does not fall under 'soda bread' and that therefore the number of phosphates allowed in 'soda bread' may not be used in tortilla. As a follow-up, a request for the use of phosphates in tortillas was discussed during this meeting. Since the EFSA is still reevaluating phosphates, the requested use is included in the calculation. The request will only be pursued after the reassessment (expected by the end of this year).

WP of governmental experts on Food Additives – 11-12/11/21

- **Self-rising flour in tortillas**
  In a specific tortilla, 3% self-rising flour is used in addition to regular flour. One Member State wondered whether this self-rising flour itself had a role in the tortilla or whether it was a way of adding phosphates to the tortilla dough. Phosphates are not allowed in tortillas. The majority of Member States view it as an illegal use of phosphates.

WP of governmental experts on Food Additives – 13/09/23

WGA 23/04/04 Use of sorbates in tortillas

SCOPAFF statements

SCOPAFF

Article 19

Interpretation decisions

Where necessary, it may be decided in accordance with the regulatory procedure referred to in Article 28(2) whether or not:

(a) a particular food belongs to a category of food referred to in Annex II; or

(b) a food additive listed in Annexes II and III and permitted at 'quantum satis' is used in accordance with the criteria referred to in Article 11(2); or

(c) a given substance meets the definition of food additive in Article 3.

* Standing Committee on Plants, Animals, Food and Feed

SCOPAFF statements
Example in relation to status as FA (1)

SCOPAFF opinion on clarification as regards the status of buffered vinegar (17/11/20):

- *Buffered vinegar is considered neither as a substance normally consumed as a food in itself, nor as a characteristic ingredient of food.*
- *The use of "buffered vinegar" where it delivers a technological effect in the foods to which it is added represents an intentional use as a food additive.*

→ Regulation (EU) 2023/2086 permitting buffered vinegar as a new FA (preservative & acidity regulator) E 267

EU specialty food ingredients

SCOPAFF statements
Example in relation to status as FA (2)

SCOPAFF opinion on clarification as regards the status of some rice derived products (30/11/21):

- *Powders obtained from the non-edible parts of rice such as hulls/husks which perform a technological effect in foods are considered neither as a substance normally consumed as a food in itself, nor as a characteristic ingredient of food.*
- *The intentional addition of rice husk or hull powder to food for a technological purpose, e.g. to act as an anticaking agent or carrier in foods, is deemed to meet the definition of a food additive*

→

Applications for authorisation of 2 new food additives:

- Based on rice bran
- Based on rice hulls

(received by EFSA 17/06/22)

SCOPAFF statements

Example in relation to technical effect in the final product

Labelling of substances having a technical function in the production of bakery ware.

The Regulation (EC) No 1333/2008 on food additives authorises the use of several additives as flour treatment agents. These are substances, other than emulsifiers, which are added to the flour to improve its baking quality. Those comprise phosphoric

acid and phosphates (E 338 – 452), ascorbic acid and ascorbates (E 300 – 301) and L-cysteine (E 920). These additives, although authorised in food category 6.2.1 Flours, do not have a function in the flour, but during the preparation of the dough. They contribute to the stability of the dough, the structure of the crumb and the volume of the bread, which will be remaining characteristics of the bread. The composition of the dough and the composition of the bread are the same.

Those substances are used for a technological purpose in the manufacturing and processing of bakery wares, in which they are present as such or as a by-product, and of which the effect remains in the final product. Therefore they are considered to be used as food additives.

In accordance with the Regulation (EU) No 1169/2011 on the provision of food information to consumers, they have to be included in the list of ingredients. The exemption rules on labelling foreseen by Article 20 of that regulation do not apply in this case.

The majority of the Member States generally agreed with this point of view, however some Member States requested that such issues should be considered case by case.
A Member State did not agree that the use of this additive should be labelled.

SCOPAFF statements
Example in relation to food categorisation

Categorisation of 'macaron' in the food category system of Annex II to Regulation (EC) No 1333/2008.

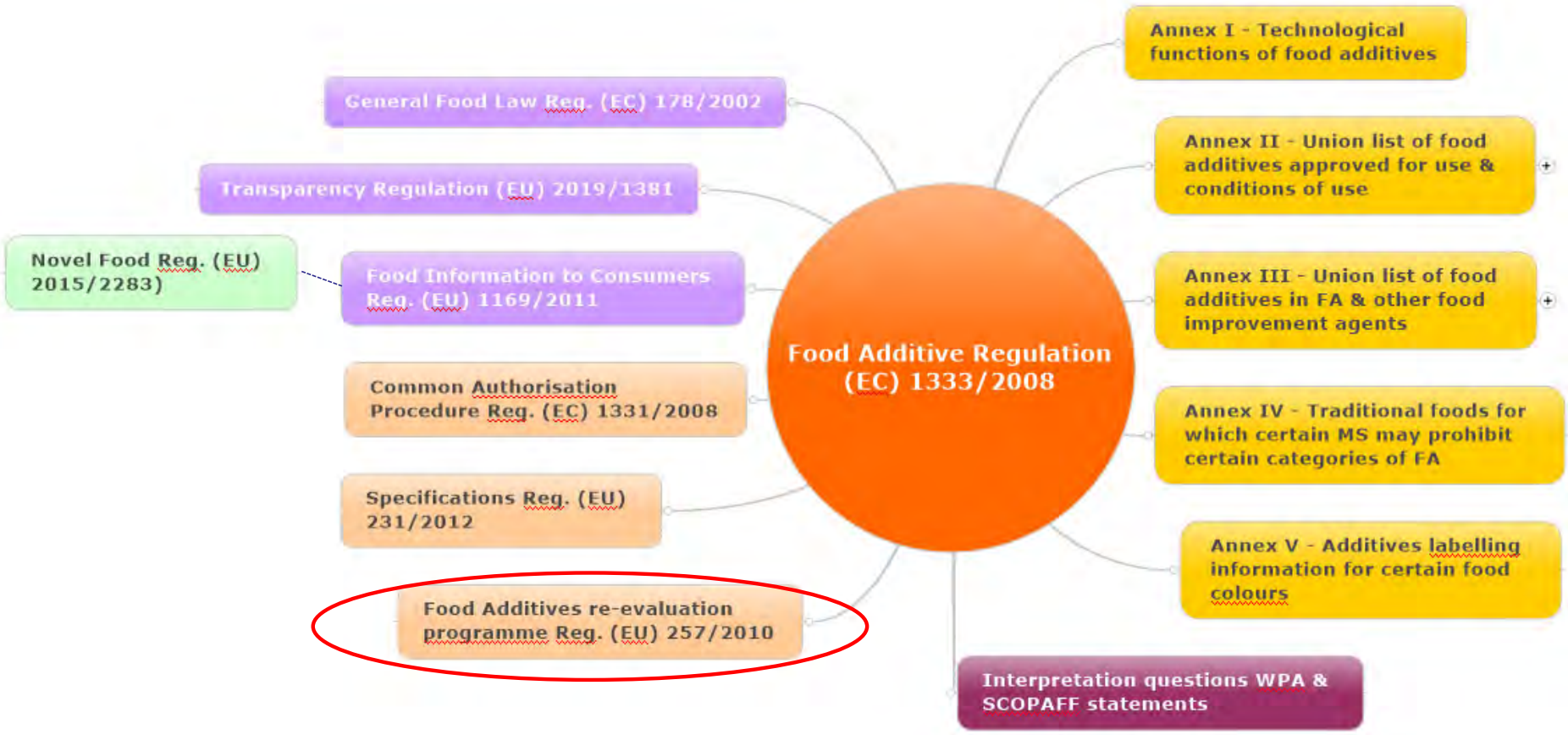
A macaron (macaroon) has typically a round shape and its surface is smooth or cracked. The macaron is typically made with almonds, sugar and egg whites. The macaron may also be placed on the market with a filling akin to a "sandwich form" where two macarons are connected with such filling.

Based on the Member States' request, the appropriate categorisation of macaron and the possible filling in the food category system of Annex II to Regulation (EC) No 1333/2008 was discussed at the Working party of Governmental Experts on Additives on 6 September 2018.

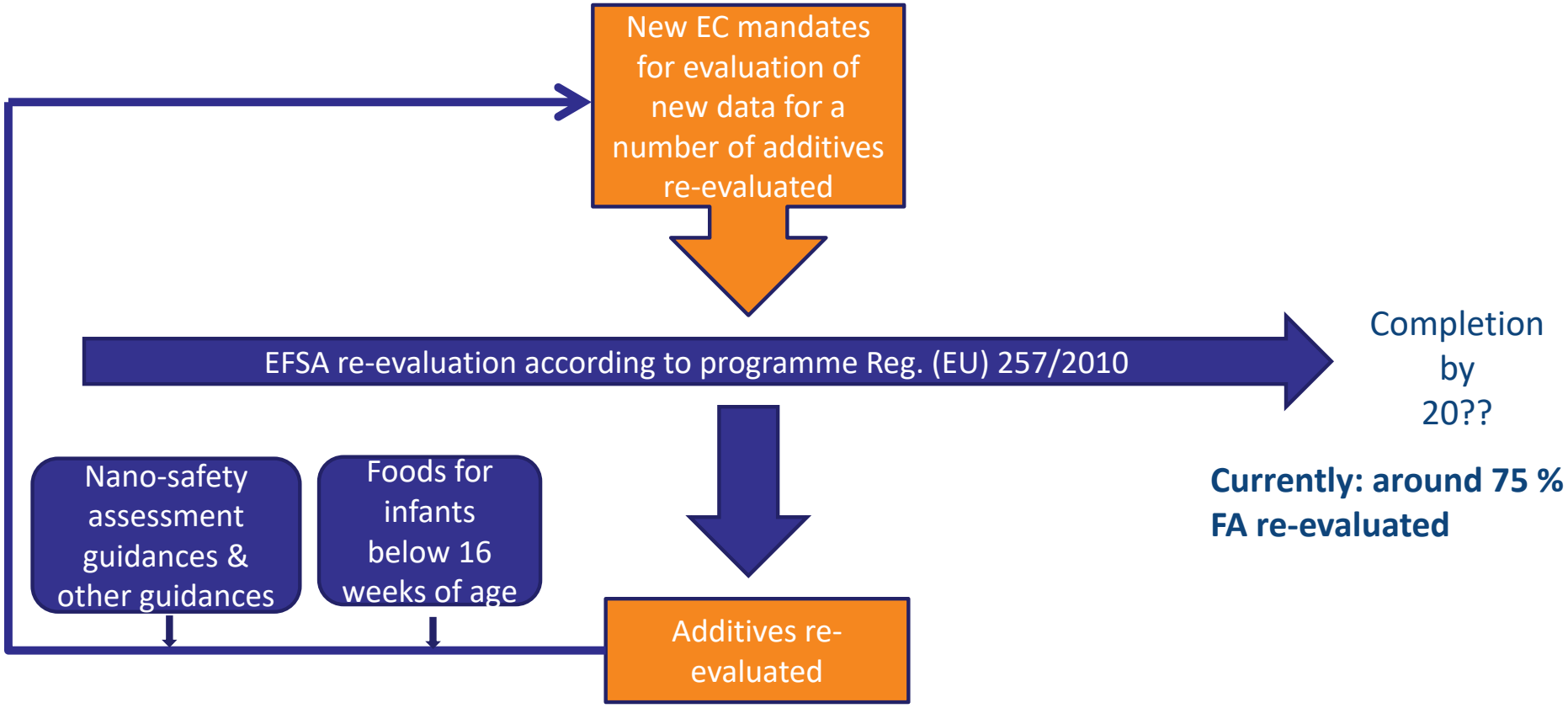
The Committee concluded unanimously the following :

- A macaron without filling shall fall within the food category '*07.2 Fine bakery ware'* and food additives may be used under the conditions set out by Regulation (EC) No 1333/2008 for this category.
- If a macaron is placed on the market with a filling akin to a "sandwich form", it shall be considered as a compound food. The filling shall fall within the appropriate category, such as, for example the food category '*05.4 Decorations, coatings and fillings, except fruit based fillings covered by category 4.2.4'* Food additives may be used under the conditions set out by Regulation (EC) No 1333/2008 for the appropriate category.

Food additives re-evaluation



Food additives re-evaluation
A never-ending exercise?



Currently: around 75 % FA re-evaluated

EU specialty food ingredients

Food additives re-evaluation
On-going original call for data

Additive	Comments
FA in gaseous form Carbon dioxide, helium, nitrogen, nitrous oxide, butane, isobutane, oxygen, hydrogen	Launch of targeted call for data in 2023: • Call for occurrence data* (27/03/23-30/06/23) • **Targeted call (28/06/23 – 31/12/23)**

efsa

* As part of general call for FA occurrence data

*Source: FAFPlenary meeting 9-10/11/22

Food additives re-evaluation

On-going supplementary calls for data (no opinion published yet)

Additive	Comments
Gluconic acid-gluconates (E 574-579)	• Call for scientific data in 2012! • Call for usage level and/or concentration data in 2016 • Call for occurrence data* (27/03/23-30/06/23) • **Targeted call (28/06/23 – 31/12/23)**
Ribonucleotides (E626-635)	• Call for scientific data in 2010! • Call for usage level and/or concentration data in 2016 • Call for occurrence data* (27/03/23-30/06/23) • **Targeted call (28/06/23 – 31/12/23)**

* As part of general call for FA occurrence data

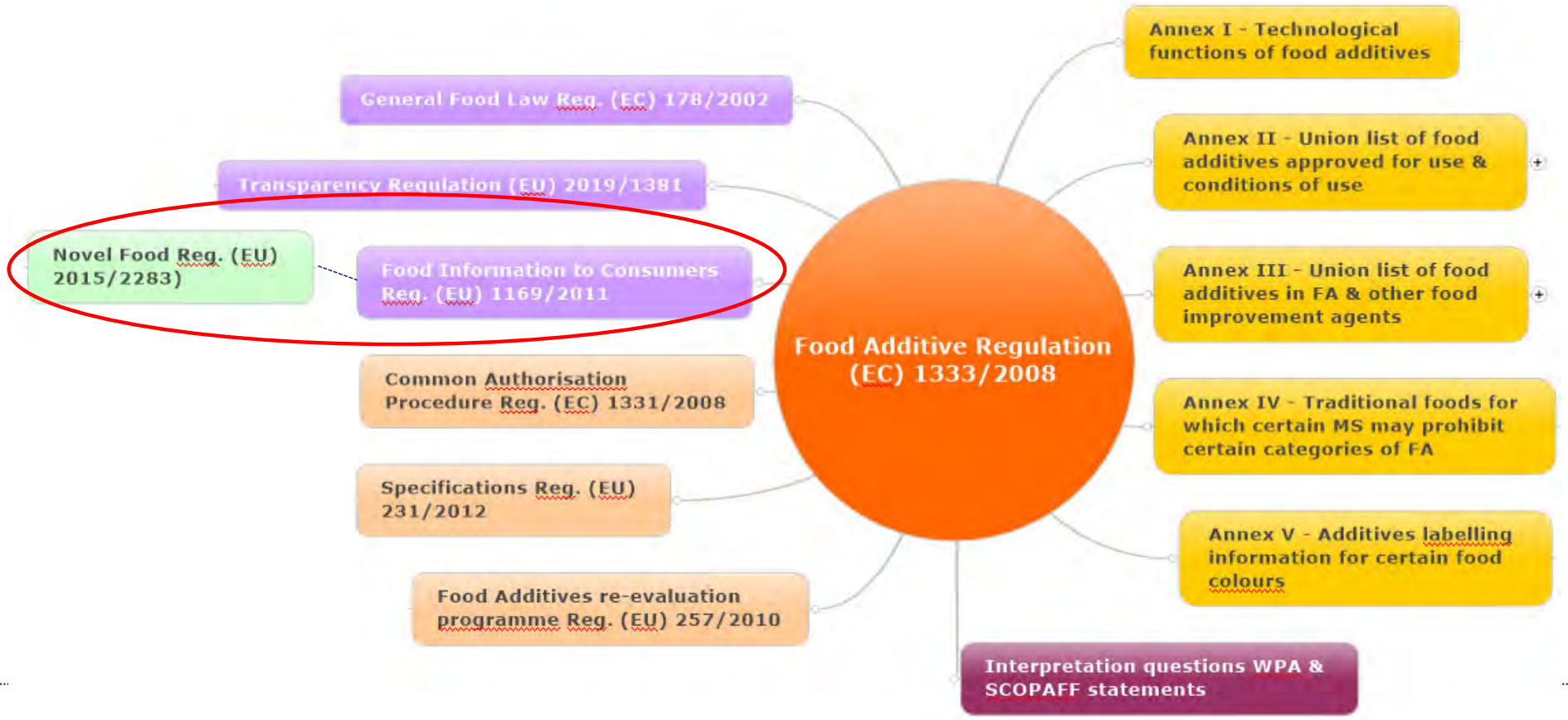
Food additives re-evaluation

COM follow-up calls for data (1st opinion already published)

Additive	Comments
Phosphoric acid-phosphates (E 338-341, E 343, E 450-452)	• Public call for technical data (05/07/23-05/03/24) • Nano-Tr guidance, specifications, analytical methods in foods & beverages, **data on uses/use levels (Annexes II & III of FAR)**
Celluloses (E 460-465, E 468, E 469)	• Public call for technical data (29/08/23 – 29/11/23) • Heavy metals

* As part of general call for FA occurrence data

Labelling


General Food Law Reg. (EC) 178/2002
Transparency Regulation (EU) 2019/1381
Novel Food Reg. (EU) 2015/2283)
Food Information to Consumers Reg. (EU) 1169/2011
Common Authorisation Procedure Reg. (EC) 1331/2008
Specifications Reg. (EU) 231/2012
Food Additives re-evaluation programme Reg. (EU) 257/2010
Food Additive Regulation (EC) 1333/2008
Annex I - Technological functions of food additives
Annex II - Union list of food additives approved for use & conditions of use
Annex III - Union list of food additives in FA & other food improvement agents
Annex IV - Traditional foods for which certain MS may prohibit certain categories of FA
Annex V - Additives labelling information for certain food colours
Interpretation questions WPA & SCOPAFF statements

Labelling of nano-ingredients
Revised ENM definition (1)

FIC

- All ingredients present in the form of ENMs shall be clearly indicated in the list of ingredients
- The names of such ingredients shall be followed by the word "nano" in brackets
- The definition of ENM is established in the Novel Food Regulation

Novel Food

- Food consisting of nanomaterials are novel
- 'Engineered nanomaterial' means any intentionally produced material that has one or more dimensions of the order of 100 nm or less or that is composed of discrete functional parts, either internally or at the surface, many of which have one or more dimensions of the order of 100 nm or less, including structures, agglomerates or aggregates, which may have a size above the order of 100 nm but retain properties that are characteristic of the nanoscale. Properties that are characteristic of the nanoscale include: (i) those related to the large specific surface area of the materials considered; and/or (ii) specific physico-chemical properties that are different from those of the non-nanoform of the same material.

Labelling of nano-ingredients
Revised ENM definition (2)

- The definition of ENM in the Novel Food Regulation is under revision
- The new definition will continue to impact indirectly the labelling of all nano-ingredients
- Labelling and safety of potential nano-food additives are addressed separately:
  - Safety: Art. 12 of the Food Additive Regulation

Article 12

Changes in the production process or starting materials of a food additive already included in a Community list

When a food additive is already included in a Community list and there is a significant change in its production methods or in the starting materials used, or there is a change in particle size, for example through nanotechnology, the food additive prepared by those new methods or materials shall be considered as a different additive and a new entry in the Community lists or a change in the specifications shall be required before it can be placed on the market.

  - Labelling: FIC & FA Regulation
- Clarification of the interplay?

Revision of FIC
Vegetarian/vegan (1)

Current legal situation

- No EU food labelling legislation for the use of the terms of “vegetarian” or “vegan” yet.
- Article 36.3 of Regulation (EU) 1169/2011 on the provision of food information to consumers lays down that the European Commission shall adopt an implementing act on the application of the requirements to voluntary information related to the suitability of a food for vegetarians or vegans.
- November 2021 – At its Advisory Group meeting, DG SANTE announces that **the vegetarian/vegan labelling is currently on hold and that it is NOT an immediate priority** (prioritisation of revision of FIC Regulation on date marking, FOP labelling & nutrient profiles (claims); origin labelling; alcoholic beverages)

Revision of FIC
Vegetarian/vegan (2)

Animal studies requirements concerning products suitable for vegan diet

Upon request from their customers of the food and drink industry, suppliers of specialty food ingredients may issue statements implying that their company has not conducted animal studies for the pre-market approval of the said ingredients.

In the case of generic ingredients, i.e. not related to specific authorisation holders, such statements shall be assessed against the nature of the studies required from the first applicant who got the original authorisation:

Actually, whilst factually correct[1], **a statement by a producer other than the first applicant, implying that their company has not conducted any animal studies for the approval of the ingredient may be misleading, as these studies might have been carried out by the original applicant to obtain the generic authorisation.**

Animal studies should be conducted for the purpose of the authorisation of specialty food ingredients only in those cases where they are necessary. EU Specialty Food Ingredients does not consider that animal studies conducted when strictly required by specific legislation or accompanying guidance documents disqualify products from being suitable for vegan diet.

Nevertheless, where, for the purpose of establishing compliance with "vegan" status, a confirmation that no animal studies were conducted for approval of regulated food ingredients/ related health claims is requested from specialty food ingredients suppliers, the following has to be taken into account when assessing the truthiness of such a statement:

- **Authorisations** of ingredients such as, **and non-exhaustively**, food additives, novel food ingredients or their related Art. 13.1 function health claims **are generic**: once the authorisation is granted to the first applicant, it is valid for any other producer. Unlike the original applicant, this latter does not need to submit an application dossier for evaluation of the safety of said ingredient / the validity of the Art. 13.1 function health claim.
- **Authorisation** of a regulated ingredient generally implies an assessment of its safety, which may well **require animal testing**. Hence the producer who obtained the original approval may not be able to confirm that no animal testing has been carried out.

[1] EU Specialty Food Ingredients' do not see grounds for executing liability for incorrectness of such statement.

Federation of European Specialty Food Ingredients Industries
Avenue de Tervuren 13 A - b7 – 1040 Brussels
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https://www.specialtyfoodingredients.eu/wp-content/uploads/migration/Final_statement_animal_studies_requirements_concerning_products_suitable_for_vegan_diet.pdf

EU specialty food ingredients

Revision of FIC
"Free from" claims (1)

MEP Aldo Patriciello (EPP, Italy) - 2022

Subject: Misleading consumer information because of 'free from' labels

The plan to revise EU rules on the information provided to consumers towards the end of 2022 aims to ensure better labelling information to help consumers make healthier and more sustainable food choices. The widespread use of 'free from' on package labelling on an increasing range and number of products has long been observed in products placed on the EU market. While such 'free from' labels should inform consumers about the absence of an ingredient for environmental or health reasons, e.g. parabens, more and more 'free from' labelling is driven by marketing motives based on public perceptions about ingredients, e.g. salt, sugar or palm oil, regardless of the properties of their substitutes. Given this, ***does the Commission also intend to address the misleading use of labels such as the 'free from' label****, which is often used to imply that the product is better from an environmental or health point of view because of the absence of an ingredient, even if there is no evidence of such comparative benefits?*

European Parliament

Revision of FIC
"Free from" claims (2)

COM reply to MEP Aldo Patriciello

Subject: Misleading consumer information because of 'free from' labels

Pursuant to Regulation (EC) No 1924/2006 on nutrition and health claims made on foods (the Claims Regulation), nutrition claims state, suggest or imply that a food has particular beneficial nutritional properties.

The Claims Regulation provides the list of the nutrition claims that can be made on foods, including 'Free from' claims, and the conditions applying to each of them.

Statements referring to a specific ingredient are not always linked to a particular beneficial nutritional property of a food. Where this is the case, Article 7 of Regulation (EU) No 1169/2011 on food information to consumers (the FIC Regulation) already provides that food information must not be misleading particularly by suggesting that a food possesses special characteristics when in fact all similar food possess such characteristics.

This might be the case in particular, when information on food is specifically emphasising the presence or absence of certain ingredients and/or nutrients. ***National competent authorities are responsible for the appropriate implementation and enforcement of the relevant EU rules and in this role shall assess the relevant statements on a case-by-case basis .***

Against this background, the Commission does not consider necessary to revise the FIC rules applicable to 'Free from' claims in the context of the ongoing revision of the FIC Regulation, which will focus on the labelling initiatives announced in the Farm to Fork Strategy.

European Commission

EU specialty food ingredients

Revision of FIC
"Natural" claims (1)

European Parliament: AGRI/ENVI report on the farm to fork strategy proposed by the European Commission includes the following in para 95:

*"... healthy products, including food, may contain natural or synthetic ingredients which have different impacts on the environment and the health of consumers; [*the report*] Calls for the* ***introduction of mandatory labelling schemes for healthy products****, indicating whether an* ***ingredient is of synthetic origin*** *when obtained by a chemical synthesis, especially in cases where natural* ***equivalents exist****".*

Result of the campaign "*We value true natural*" by Safe Food Advocacy

safe
Safe Food Advocacy Europe

European Parliament

Revision of FIC
"Natural" claims – debunking the myths (2)

FACT

All food ingredients, including those that have been synthesized chemically:

- must be safe, i.e., not injurious to health and fit for human consumption,
- may possess particular health benefits that are recognised through relevant health claims.

https://www.specialtyfoodingredients.eu/wp-content/uploads/media/2217SFISFI-Synthetic_Food_Ingredients-Paper-Aug2022-v1.pdf

Revision of FIC
"Natural" claims (3)

SAFE Food Advocacy Europe – Position paper (29/04/22)
"WeValueTrueNatural" campaign and green claims: how to ensure consumers are not misled by unsubstantiated claims

"... Critics say the proposed labelling is overly focused on carbon emissions, ignoring crucial factors such as recyclability and biodegradability. ***It is a fact that products made of natural ingredients are fully biodegradable unlike their synthetic counterpart****, being this an information that should be transmitted to consumers while purchasing."*

Fact or Myth?

EU specialty food ingredients

Revision of FIC

"Natural" claims – debunking the myths (4)

Bias that "synthetic" food ingredients are less sustainably produced than other food ingredients, in particular "natural" ingredients, is purely subjective: whilst the environmental impact of food ingredients may differ, this is not necessarily in relation to the use of chemical synthesis vs. a process by which a raw material is converted into an ingredient. Many factors shall be taken into consideration, e.g., sustainable sourcing in relation to biodiversity and the risk of natural resources' depletion, water and energy consumption and other relevant factors.

Moreover, a statement such as "products made of natural ingredients are fully biodegradable unlike their synthetic counterparts" is highly questionable: it does not take into account that biodegradation, i.e., the break down by biological agents such as bacteria and/or fungi, is not applicable to minerals used as food ingredients like the food additive E 551 (silicon dioxide).

Furthermore, synthetic amorphous silicon dioxide, which is industrially produced from raw material sand through either precipitation methods or flame processes, is not distinguishable from naturally occurring amorphous silica e.g., in plants and integrates again into the natural cycle of silica: at the end, it sediments as sand and forms rocks.

FACT

Like the production of any other food ingredients, the production of "synthetic" food ingredients has an environmental impact. However, chemical synthesis does not necessarily lead to an environmental impact higher than other production processes. This shall be measured according to established methodologies.

https://www.specialtyfoodingredients.eu/wp-content/uploads/media/2217SFISFI-Synthetic_Food_Ingredients-Paper-Aug2022-v1.pdf

Revision of FIC
"Natural" vs. "artificial" additives

- **Natural and artificial additives**

This item involves an open discussion on a possible distinction between 'natural' and 'artificial' additives. Member States concluded that EU legislation on food additives makes no distinction between 'natural' and 'artificial' food additives. For the time being, the term 'natural' will not be included in the food additives legislation either. As regards the use of claims such as 'without artificial food additives', it was concluded that food businesses may make such claims on a voluntary basis, provided that they comply with the requirements under Article 36 of Regulation (EU) No 1169/2011, i.e., that they are not misleading, ambiguous or confusing to consumers. It emphasises that the primary responsibility for enforcing legislation is with Member States. The assessment of compliance is made by the competent authorities in the Member States on a case-by-case basis.

There is also a proposal to define the term 'natural' for food products in EU food legislation (Regulation (EC) No 1924/2006).

Conveying knowledge about SFI
Responsible B2B communication

WHAT IS A RESPONSIBLE B2B COMMUNICATION ABOUT SPECIALTY FOOD INGREDIENTS?

B2B communication includes non-exhaustively messages conveyed in specialised press including digital media, commercial brochures, websites, social networks, exhibition materials and displays, webinars, conference speeches etc. intended to professionals of the food and food ingredients sectors.

Responsible B2B Communication:

- Is based on up-to-date evidence
- Provides clear and fair information
- Builds on intrinsic benefits of the ingredient
- Refrains from misleading comparisons with other ingredients
- Does not play with unsubstantiated fears from consumers or hypothetical negative claims

Responsible communication will be honest, fair and focused on benefits and characteristics of a given ingredient. It will be based on science and will provide substantiated claims and information. This will enable food and drink manufacturers and, ultimately, consumers, to access reliable information on specialty food ingredients in order to make informed choices.

https://www.specialtyfoodingredients.eu/wp-content/uploads/migration/EU_Specialty_Food_Ingredients_Guidance_on_Responsible_B2B_Communication.pdf

Content

- Introduction to EU Specialty Food Ingredients
- EU legislation on food additives – recent and on-going developments
- **Farm to Fork strategy – a game changer?**

Sustainability is not just a word

Contribution of our sector to the Farm to Fork strategy

N° 13	N° 14	N° 15 & N°16	N°26	N°1 & N°23
• Initiative to improve the **corporate governance framework**, including a requirement for the food industry to integrate sustainability into corporate strategies	• Develop an EU code and monitoring framework for **responsible business and marketing conduct** in the food supply chain	• Launch initiatives to stimulate **reformulation** of processed food, including the setting of **maximum levels for certain nutrients** • Set **nutrient profiles**	• Proposal for **EU-targets for food waste reduction** (2023)	• Proposal for a **legislative framework for sustainable food systems** (2023) • Proposal for a **sustainable food labelling framework** (2023)

Sustainability is not just a word

Contribution of our sector to the Farm to Fork strategy

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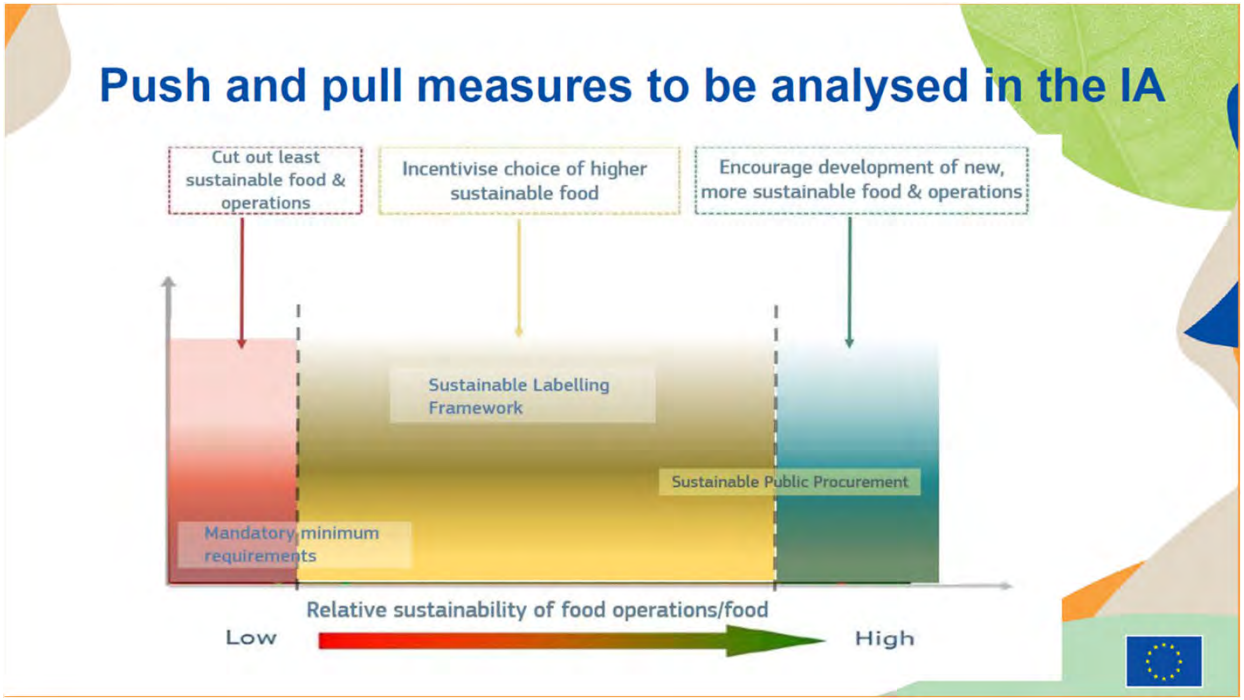
Sustainability is not just a word
Focus on FSFS & sustainable food labelling framework

N°1 & N°23

- Proposal for a **legislative framework for sustainable food systems** (2023)
- Proposal for a **sustainable food labelling framework** (2023)

?



Sustainability enablers
Ingredients sustainably produced

Sustainability is not just a word

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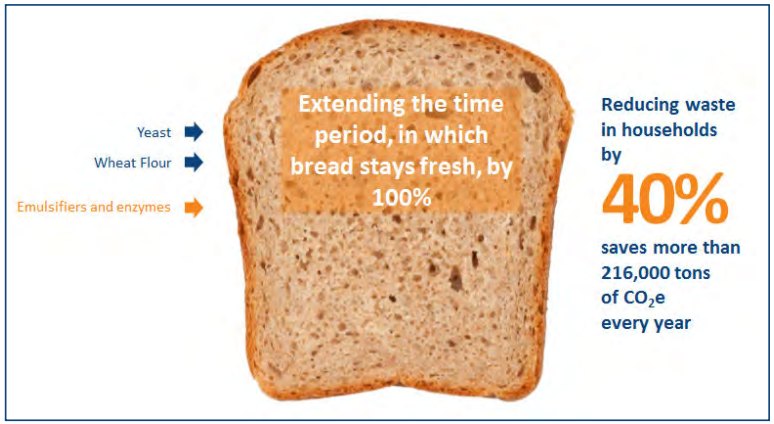
Sustainability is not just a word
Focus on food waste

N°26

- Proposal for **EU-targets for food waste reduction** (2023)



Based on LCA screenings from a member company

Sustainability is not just a word

Contribution of our sector to the Farm to Fork Strategy

N° 13	N° 14	N° 15 & N°16	N°26	N°1 & N°23
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Sustainability is not just a word
Focus on reformulation

N° 15 & N°16

- Launch initiatives to stimulate **reformulation** of processed food, including the setting of **maximum levels for certain nutrients**
- Set **nutrient profiles**

Less sugars, less fats, less calories
- Reduction of obesity
- Prevention and control of diabetes
- Increase healthiness and nutritional value

Sugar and fat-reduced products that provide:
- A good flavour
- The right texture
- An indulgence factor

HEALTHIER AND MORE SUSTAINABLE DIETS

European citizens are demanding varied and flexible diets

By providing innovative ingredient solutions, our industry can contribute to a huge variety of enjoyable food & drink products.
- Developing ingredients to respond to individual and flexible dietary choices
- Working to substitute ingredients and/or sources of ingredients that are at risk or less sustainable
- Contributing to an equal distribution and access to sustainable food

challenge

Reference

Positive control
Full sugar

Test 1

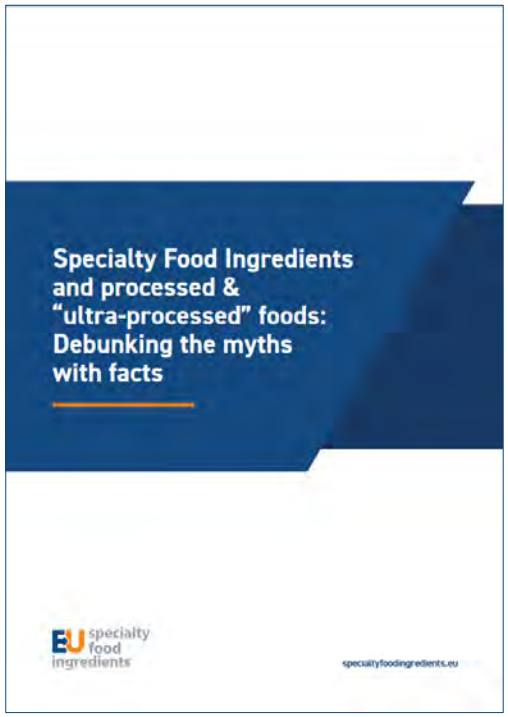
Negative control
30% sugar reduced
Taking out sugar : muffin collapses

solution

Test 2

30% sugar reduced with rice starch and oligofructose

Sustainability is not just a word
The "UPF" controversy



GOOD TO KNOW

Food processing is used to:

- produce food **more efficiently**, i.e., more with less resources (raw materials, energy) and waste;
- make some foods **edible**;
- increase **storage** stability, i.e., **shelf life** of food (e.g., by preventing or inhibiting microbial spoilage and biochemical reactions, e.g., browning);
- enhance **palatability** of food, by e.g., improving smell, taste, appearance, and texture;
- maintain and/or **improve nutritional value** of food (e.g., by removing anti-nutrients, improving digestibility and absorption of nutrients), or by enhancing nutritional value through fortification/enrichment;
- increase **food safety** by reducing unwanted compounds (like allergens or acrylamide) from food.

Processing should not be used as a reference point to determine the healthiness of the diet.

A FINAL WORD

It is regrettable that specialty food ingredients are held hostage to controversies about "processed" or "ultra-processed" foods, which go beyond them. It may be recalled that processing is not an adequate reference point when it comes to assessing the healthiness of a food and that it can help provide safer and more nutritious foods.

Specialty food ingredients are there for a reason: delivering nutritional, technological and health benefits, they play a key role in the creation of safe, nutritious, tasty, convenient, affordable and sustainable food and drink products. Their safety is ensured by thorough evaluations by food safety agencies. The world is facing multiple issues, from feeding a growing population in a sustainable way to tackling public health concerns, as well as meeting individual nutritional needs and dietary choices. A continued and open-minded focus on science-driven innovation is necessary in order to find solutions to the challenges of today and tomorrow.

https://www.specialtyfoodingredients.eu/wp-content/uploads/media/Processed_Foods-Paper.pdf

EU specialty food ingredients

Sustainability is not just a word
Focus on the Code of Conduct

N° 13	N° 14	N° 15 & N°16	N°26	N°1 & N°23
• Initiative to improve the **corporate governance framework**, including a requirement for the food industry to integrate sustainability into corporate strategies	• Develop an EU code and monitoring framework for **responsible business and marketing conduct** in the food supply chain	• Launch initiatives to stimulate **reformulation** of processed food, including the setting of **maximum levels for certain nutrients** • Set **nutrient profiles**	• Proposal for **EU-targets for food waste reduction** (2023)	• Proposal for a **legislative framework for sustainable food systems** (2023) • Proposal for a **sustainable food labelling framework** (2023)

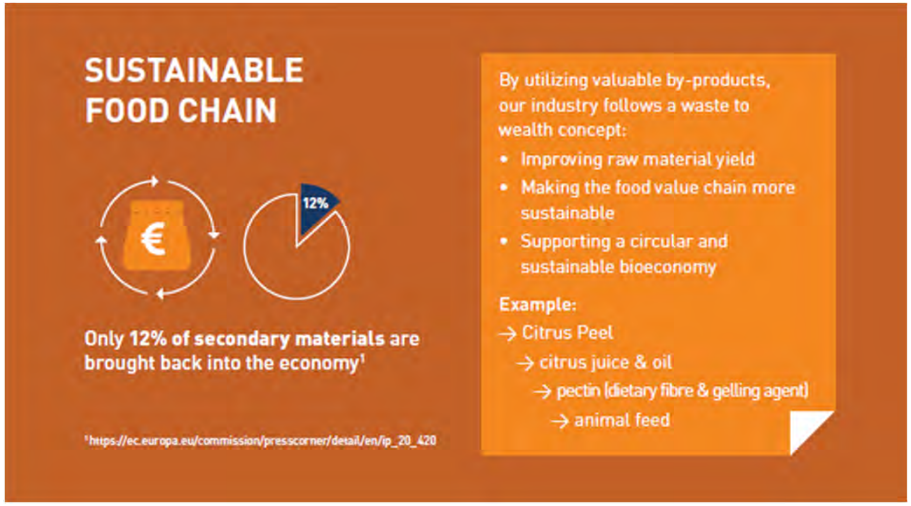
Sustainability is not just a word

Contribution of our sector to the Farm to Fork strategy

N° 14

- Develop an EU code and monitoring framework for **responsible business and marketing conduct** in the food supply chain

Actions that signatories can voluntarily commit to undertake to tangibly improve and communicate their sustainability performance.



Our commitments

✓ Signatory of the Code in July 2021

List of signatories 2023:
https://food.ec.europa.eu/horizontal-topics/farm-fork-strategy/sustainable-food-processing/code-conduct_en

✓ Association's commitment to promote the Code

✓ Member company's commitments to contribute reaching to the aspirational objectives & targets of the Code

https://food.ec.europa.eu/system/files/2022-04/f2f_sfpd_coc_report_2022_eu-sfi.pdf

Sustainability is not just a word
Focus on corporate governance

N° 13	N° 14	N° 15 & N°16	N°26	N°1 & N°23
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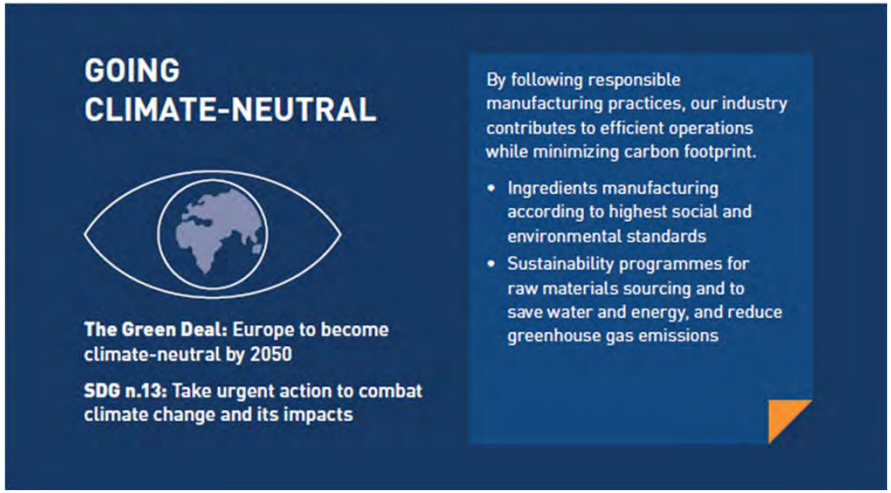
Sustainability is not just a word

Contribution of our sector to the Farm to Fork strategy

N° 13

- Initiative to improve the **corporate governance framework**, including a requirement for the food industry to integrate sustainability into corporate strategies



Our commitments

- ✓ Co-operate closely with all actors in the value chain, in particular farmers and the food industry
- ✓ Accelerate our industry's path towards minimized climate impact
- ✓ **Innovate sustainably, so that new products and solutions offered to consumers contribute to healthier and more sustainable diets**

Sustainability is not just a word
It translates into sustainable innovation

PROCESSING SUSTAINABLY:

Sustainability starts at home. Ingredient manufacturers constantly strive for processing solutions that optimise both their own production processes and enable others in the food chain to apply more sustainable processes.

SUSTAINABLE SOURCING:

Growing concerns about the long-term viability of certain natural resources has stimulated food ingredient manufacturers to revisit current practices and explore alternatives.

HEALTHIER ALTERNATIVES:

Reformulating products to reduce sugar, salt and fat content is increasingly a priority for the food industry. The food ingredient industry has responded with a range of alternatives that provide functional solutions for the food industry while supporting ambitions for a switch to healthier and more sustainable diets.

WASTE SOLUTIONS:

Food waste is widely acknowledged to be a significant obstacle to an optimally sustainable food system. Food waste occurs at many stages in the food chain. Food ingredients offers some solutions for reducing consumer food waste.

https://www.specialtyfoodingredients.eu/ingredients-and-benefits/sustainable-innovation/

THANK YOU

www.specialtyfoodingredients.eu
info@specialtyfoodingredients.eu

To know more about specialty food ingredients

Everything you always wanted to know about... food additives
Everything you always wanted to know about... health ingredients
Specialty food ingredients: additives in the safety spotlight
How specialty food ingredients help meet specific dietary needs
Specialty food ingredients: sustainable solutions for the food systems
Specialty Food Ingredients: innovating to meet consumer needs
"Synthetic food ingredients": debunking the myths with facts
Specialty food ingredients and processed & "ultra-processed" foods: debunking the myths with facts
Did you know? Facts about processed and ultra-processed food

Animated videos:
What are specialty food ingredients?
How can I be sure that food additives are safe?
Should I be afraid of processed food?
Can specialty food ingredients add health benefits to our food?
How can food reformulation help achieve healthier diets?
Are there food ingredients solutions to meet individual dietary needs?
What is the contribution of specialty food ingredients to sustainable food systems?
Can specialty food ingredients help reduce food waste?