



The EU Commission proposal on transparency and sustainability of the EU risk assessment in the food chain¹

EuropaBio Position Summary – Please read the full position paper [here](#).

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To build trust in food safety, let's promote science

We fully support the Commission's objective to increase trust and confidence in the EU's procedure for risk assessment in the food chain, by making it more transparent and sustainable. The EU's risk assessment system is robust, but looking ahead, we agree that it should become more efficient, consistent, and transparent to help ensure consumer confidence and the system's viability in the long term. Much can be learned from other risk assessment systems in the EU and around the world.

Comprehensive transparency should not be limited to regulatory studies, but include more transparency in EFSA's processes and a step change in communication. Let the science speak loud and clear! The focus of this initiative should be on informing the wider public about real versus perceived health threats, and on tackling disinformation and misperceptions, so that consumers can rest assured that their food is safe. Europe's citizens deserve to know the truth: modern food and agriculture have brought unprecedented levels of food safety to Europe, and food security to the world.

Certain elements of the Commission proposal such as improved risk communication can help to achieve the stated objectives of increasing transparency and sustainability. We also strongly support the idea of making certain procedural aspects of EFSA more like in the European Medicines Agency (EMA), including the introduction of pre-submission activities. On the other hand, the proposed processes for publishing regulatory studies and conducting verification studies require clarification to ensure that they meet the aim of enhancing trust without having a counter-productive impact on the decision-making process and on competitiveness. Given that the risk assessment system is critical for food safety, innovation and all regulated industries, it is regrettable that the Commission has decided not to produce an impact assessment.

¹ Proposal for a regulation on the transparency and sustainability of the EU risk assessment in the food chain ([COM\(2018\) 179](#))

1. Build on EFSA's robust risk assessment

The current risk assessment system provides a very high level of public safety, with adequate checks to ensure the quality and reproducibility of the data submitted by applicant companies. We support measures to strengthen the reliability and objectivity of studies, such as complementary audits and controls. To ensure the highest scientific standards also in the future, it is important for the EFSA to attract and retain expertise. We welcome the proposed extension of the term for the Panel members from three to five years.

2. Increase transparency of internal processes

We would like the internal rules of procedure for risk assessment at EFSA to be more transparent, as well as the voting of Member States on authorising products which EFSA confirms to be safe. We support the disclosure to the public of information supporting applications for product authorisations, where this does not undermine the integrity of the decision making process and the legitimate protection of company interests. The timing and modalities of disclosure should be appropriate not to jeopardise innovation in the EU and the competitiveness of companies selling their products in and outside of the EU because of a lack of protection of their legitimate interests. We emphasise that disclosure of technical information, on its own, is unlikely to improve public understanding of science and trust in the risk assessment process. Improved risk communication that provides the necessary context to the technical information is therefore essential for building trust (see point 4).

3. Adopt good practices from EMA for more efficiency

More should be done to improve efficiency of the risk assessment process, because "lengthy authorisation procedures in some sectors (...) slow down the market entry process"². We strongly encourage additional streamlining of the different risk assessment practices across EFSA and compared to the other EU risk assessment bodies. We support the proposed provisions that are inspired by the existing good practices in the European Medicines Agency (EMA). EMAs' excellence is globally recognised, combining the highest scientific quality with efficient and predictable administrative procedures. The introduction of pre-submission advice for the applicant is an important step in this right direction, and we hope that the proposed reform of the EFSA Management Board will motivate Member States to take more responsibility and defend a streamlined EFSA and its scientific outputs.

4. Improve communication and tackle misinformation

We strongly recommend a step change in communication, addressing the broad public in an easily understandable way. Unfortunately, despite ensuring high levels of public safety, the current system does not seem to be well communicated or understood by the public. We welcome the provisions reinforcing risk communication, and are looking forward to supporting the envisioned 'general plan for risk communication', provided that it ensures that risk assessors and risk managers communicate with one voice. We regret that the Commission has not proposed any actions to combat the spread and sources of misinformation that severely undermine science-based risk assessment and the credibility of EFSA.

² Fitness check of the General Food Law https://ec.europa.eu/food/safety/general_food_law/fitness_check_en