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THE NEW SUSTAINABILITY REGULATION: HOW TO INTEGRATE IT INTO FOOD SAFETY?

Key insights from the FoodSafety4EU Pre-Forum 2022

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BACKGROUND

The new legislative framework for sustainable food systems is expected to be adopted by the Commission by the end of 2023. Its goal is to accelerate and ease the transition by integrating sustainability into all food-related policies. **Looking at the new framework from the food safety angle**, the FoodSafety4EU platform hosted a **multi-actor dialogue** to discuss present and future challenges to be addressed to ensure a safe transition towards increased sustainability.

Strongly committed to be part of and support this transition, the FoodSafety4EU platform members and stakeholders jointly identified key leading challenges for a **multi-actor implementation of the new sustainability framework** principles and objectives.



LEADING CHALLENGES

- Metrification of sustainability performance
- Strategic implementation in a longer timeframe
- Adequate funding and financial instruments
- Legal operationalisation and organisational capacity (at EU and Member State level)
- Complementing risk analysis with sustainability analysis
- Feeding regulatory science providing policy supporting results
- Considering food environment aspects (access to food)
- Implementing systemic approach and multi actor approach
- Innovating communication and education engaging with youngs
- Societal challenges: sustainability is a society choice

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FOOD LAW

The framework law on Sustainable Food System should define principles, objectives, requirements, minimum standards, responsibilities or how the horizontal elements for sustainability analysis complement the existing risk analysis. This would require a longer implementation window: from Farm to Fork strategy to integration with the General Food Law. The **metrification of sustainability** should be the basis for any legal objectives, policy measures and actions.

INDUSTRY

EU's food safety is a shared responsibility, but it needs a logical and reasonable division. Main challenges arising from the **cross-over of regulations** are: excessive application of the precautionary principle; intensification of a hazard-based approach; the proliferation of national rules on food safety, leading to a patchwork; the existence of double regulation for certain chemicals; the decrease of impact assessments.

CONSUMERS

Consumers can play a key role in Sustainable Food System by reducing the food wasted, increasing vegetable protein intake, buying organic and locally grown food, increasing recycling. An adequate legal framework for a SFS should tackle overarching issues: fight food speculation, modulate incentives for bioenergy, internalise the negative externalities of food price, and ensure a level playing field among business models for food operators.

EU FOOD BANKS

36.2 million EU citizens cannot afford a quality meal every 2nd day. Ensuring food safety while fostering food donation is a priority for EU Food Banks, that advocate and support the implementation of hygiene practices to recover, collect, store, and redistribute food for charitable purposes while assuring food safety.

FS4EU YOUNGS

Young students raised important points for improvement of communication within a safe and Sustainable Food System: i) the need of well-designed social media campaigns to inform the public, ii) mandatory investment by food producing companies in their own communications and direct contact with food safety authorities, iii) rapid sharing of verified information.

FOOD SAFETY AUTHORITIES

Population growth will require getting the right trade-offs between sustainability, food security and food safety. These aspects must not be considered apart from food sovereignty and food equity. These overarching challenges are increasing the **complexity in risk analysis**. Feeding the **regulatory science** is of utmost importance to support the food safety authorities' mission.

AGRIFOOD SECTOR

New sustainability requirements are possible but need adequate support mechanisms. **Higher sustainability is a society choice**. If this transition is not managed strategically, farmers will go out of business and those who survive will concentrate the market share, externalisation of production to third countries, sustainability leakage, risk for food safety, because operators might be tempted to cut costs.

CIVIL SOCIETY

The new SFS framework law should ensure policy coherence, adopt a food environments approach, set time and legally binding targets, define strong accountability/performance mechanisms to monitor progress. Globally, 38% of edible food is lost/wasted. This could be reversed only if a comprehensive multi-stakeholder approach is implemented with ambitious targets, coherent implementation and rigid monitoring.

RESEARCH

i) Multidisciplinary collaboration is needed to fully exploit the huge potential of the stakeholders network in the food safety system; ii) combining research and communication innovation has the potential to change consumer habits; iii) systemic approach in the food safety system is essential and funding is critical.





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EXPLORING THE RELATIONSHIP BETWEEN RISK ASSESSORS AND RISK MANAGERS: CURRENT AND FUTURE PERSPECTIVES

FoodSafety4EU multi-actor dialogue

BACKGROUND

The EU General Food Law (GFL) Regulation (EC) 178/2002 establishes the principles of risk analysis in relation to food safety and its three inter-related components: risk assessment, risk management, and risk communication. Reflecting on citizens' perception of the risk assessment process, the new Transparency Regulation (Regulation (EU) 2019/1381) introduced new provisions on risk communication, the public disclosure of scientific data and information supporting requests for authorisations or for approvals of regulated products as well as other requests for scientific output, and the possibility for the Commission to request EFSA to commission scientific studies with the objective of verifying evidence used in its risk assessment process.

The proposal for a legislative framework for sustainable food systems, foreseen to be published in September 2023, aims to mainstream sustainability in all present and future EU policies and legislation impacting the food system. It will establish sustainability objectives and principles that should be consistent with the provisions and objective of the GFL.

In a dialogue with high-level experts from science, policy and society with expertise in risk assessment, management and communication, the following question was discussed:

How will the relationship between risk assessors (RA) and risk managers (RM) evolve in view of new Food Safety scenarios in Europe?

LEADING CHALLENGES

A separation between risk assessors and risk managers in the EU remains essential to ensure the objectivity, scientific integrity, and credibility of the conclusions of the risk assessment process.

The transition towards a circular economy and sustainable food systems may bring changes in risk analysis approaches if sustainability criteria needs to be weighted in. Here, the risk manager might have a bigger role to play.

Moving towards a more holistic approach to sustainability, it is crucial to ensure balance and proportionality among the three pillars of sustainability including food safety and food security. Methods and approaches to integrate sustainability assessments will therefore be required.



On June 7, 2023, the FoodSafety4EU hosted a multi-actor dialogue between high level experts from risk assessment, industry, research and food law. They shared their views, also bringing into the discussion recent experiences from two Horizon EUROPE funded sister projects focusing on emerging risk assessment challenges (FoodSafeR and HoliFood).

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Current relationships between risk assessors and risk managers

In the EU, risk assessors (RA) and risk managers (RM) are institutionally separated. While **the dialogue between them is essential, the separation is essential too** since it is the basis for providing an objective and trustworthy risk assessment. The GFL emphasises the vital role of risk communication in explaining risk assessment findings as well as risk management decisions.

Equally important is the communication between RA and RM. RM formulates questions of potential food safety risks to be addressed by RA and it **is critical how the question is formulated** for the correct framing and interpretation of the question at stake.

A recent survey (held in the course of the ENCOMRAN project, funded by EFSA) confirmed that the involved actors do acknowledge the legal separation between risk assessment and risk management, which improves the overall quality of the risk analysis process, however, they both ask for **more frequent interaction and informed communication**.

Changes needed in the relationships between RA and RM to enable risk analysis of food safety issues in view of the EU Green Deal and sustainability initiatives

When looking at the sustainability of food systems and the challenges linked to the circularity of resources, emerging needs should be addressed with novel approaches. An interesting example comes from urban food systems: urban farming is a very promising aspect, but it might bring safety risks, e.g. (re)introduction of heavy metals in the food chain. Similarly, the increased resistance to azole fungicides might be correlated to increased environmental exposure to these substances.

As there is no single agency that can address the emerging complexity of our food systems, it is necessary **to boost interagency cooperation**. Addressing this trend, the recent ONE conference and the relevant debate organized by EFSA and sister agencies (ECHA, ECDC, EEA, EMA, EC-JRC) in 2022 called for a more holistic approach (**ONE Health**) to deal with human, animal, and environmental health.

Overall, **there is no urgent need to change the way RA and RM interact**. Food safety RA may need to take sustainability criteria into account when dealing with circular production systems. **A broader knowledge base may be needed for RM**, who will be required to weigh in other aspects proportionally: integrating the results of a food safety risk assessment into a wider sustainability analysis is expected to be a major challenge.

How to deal with the expected connection between the General Food Law and the New Sustainability Regulation

The General Food Law sets a coherent framework and shall be still considered the foundation of the food policies. The new Sustainable Food System Framework is expected to incorporate or refer to GFL principles, including the various aspects of risk analysis. Combining risk/benefit assessment could be a way to incorporate sustainability criteria.

When defining pathways for integration, it should be taken into account that for industries/food business operators as well as food safety authorities it would be challenging to address double regulation.

To achieve sustainable food systems, **it is crucial to ensure proportionality among sustainability aspects, including food safety**. Finding the right balance among the three sustainability pillars remains a priority. Novel approaches/methodologies to make this balance possible are needed.

While risk assessors will continue to provide science-based advice, risk managers are expected to face a challenge in balancing the impacts on different areas, ensuring coherence between EU food-related legislation and policies, and making sure that risk management measures are realistic without compromising consumer health.





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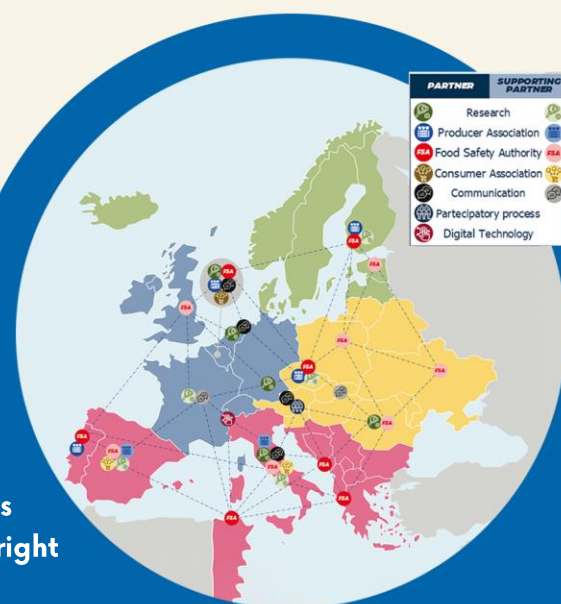
FUNDING OF EUROPEAN FOOD SAFETY RESEARCH: EXPLORATION OF BARRIERS & MITIGATION STRATEGIES BY IN-DEPTH CONSULTATIONS

Key insights from the FoodSafety4EU Food Safety Operational Lab 2 (FSOLab 2)

BACKGROUND

With its large Framework Programs for Research and Innovation, the European Union (EU) represents the largest funder for food safety research to date. This is complemented by autonomous national funding bodies in individual EU Member States, mostly operating independently from each other and the European Food Safety Authority (EFSA). In consequence, the European research area currently exhibits considerable opacity and fragmentation in food safety research funding and organizational structures, which impede

Consequently, the ambition of the multi-actor FSOLab 2 was to increase transparency in the funding of food safety research and to analyse strengths and limitations of current funding systems, methods, and processes applied by different funding bodies in Europe, followed up with targeted



IDENTIFIED BARRIERS & RECOMMENDATIONS

- **Harmonization of food safety regulations & standards across EU Member States to maximize the valorization of research funding**
- **Setting common research priorities for food safety**
- **Enhancing traceability in the distribution of financial resources**
- **Establishment of food safety as a funding discipline in its own right**
- **Allocate food safety a priority state**
- **Improving transparency in the allocation of funding to distinct scientific disciplines**
- **Raising private investment in food safety research**
- **Prioritizing long-term developments and societal challenges for funding**

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HARMONIZATION

Harmonization of food safety regulations and standards is crucial for achieving better alignment of food safety research funding in all European Member States and Associated Countries. This helps to improve the efficiency of food safety research efforts and ensures uniformly high food safety standards in all countries. Harmonization can play a vital role in safeguarding the health of consumers and maintaining their confidence in the safety of food systems.

SETTING COMMON RESEARCH PRIORITIES

A lack of common research priorities can lead to fragmented research efforts and reduce the impact of research financing. The setting of common research priorities can contribute to maximizing the impact of food safety research funding, reducing duplication of efforts and ensuring that the results of food safety research are effectively applied to food systems in shorter time. A shared Strategic Research and Innovation Agenda (SRIA) supported by all collaborating countries is a key factor in successfully aligning transnational research strategies and activities.

ENHANCING TRACEABILITY

There is a demand for closer integration and networking of funding bodies at the regional and national level, in order to jointly coordinate and harmonize activities more effectively. Besides, trans-border networking activities should be established and/or reinforced, and the formation of strategic working alliances as an amalgamation of different funding bodies sponsoring specific research areas, such as for food safety, should be envisaged.

FOOD SAFETY AS FUNDING DISCIPLINE

It would be a big step forward, if food safety became recognized as an independent discipline/category in funding & tender opportunities, rather than being subsumed into other research areas. It might be worth exploring the possibility of establishing specific national funding programmes dedicated to food safety, as a complement to the activities of EFSA, and thus to further advance food safety research.

PRIORITY STATE

Concerted and coordinated efforts must be made by all countries, both within and beyond the EU, to increase financial resources and funding for food safety measures, ideally on a long-term basis complemented by follow-on financing of innovative and successful projects. Such efforts could help to bridge existing knowledge gaps, just as to prevent, detect, and mitigate emerging and existing food-related risks and threats to human health. At a macro-level, newly acquired scientific evidence can inform policy makers and state bodies to make informed decisions and introduce new or amended policies and regulations.

IMPROVING TRANSPARENCY

The existing fragmentation and information gap hinders a broad insight into the distribution of funding among scientific disciplines not assigned by governmental entities and impedes any thorough analysis. Overlapping funding programmes from different funding agencies issued at same times can diminish the effective use of already limited financial resources, inadvertently creating competition among researchers. Competition can be a driving force for scientific progress and innovation, but excessive competition can hinder collaborative efforts and breakthroughs.

PRIVATE INVESTMENT

The implementation of public-private partnerships has already demonstrated its effectiveness and should be considered further. Dedicated platforms already bring together various public and private sector actors, which allows facilitating information and knowledge exchange, fostering mutual relationships and trust, and ultimately encourage financial support for research.

PRIORITIZING DEVELOPMENTS

Funding programs for scientific research should have some degree of stability and foresight, taking into account future needs and developments, instead of being dictated by short-term political interests. Investing in food safety research not only enhances society's resilience to crises and prevent economic losses for businesses, but also increases consumer trust and confidence in the safety of foods they consume.

LONG-TERM

LONG-TERM FUNDING

Extending the duration of research projects to a long-term funding period of 5-10 years could enhance the effectiveness and impact of research, and thus generate both a greater profundity and a wider scope of effect. A longer funding horizon would require an increase in funding to cover additional expenses.

NETWORK OF COLLABORATION

Coordinated efforts are necessary to address the issue of administrative burden in national ministries and research funding entities for reviewing and processing research applications. To address this challenge, a potential solution is to establish alliances at national or regional levels by pooling resources and jointly developing more effective infrastructures for managing funding calls.

