



European Food Safety Authority EFSA Strategy 2027

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Public consultation on the draft 2027 Strategy

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Strategic Foundation

Mission

Vision

Values

Who we are

Who we work with

How we work

Mission

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Vision

5000 character(s) maximum

Values

5000 character(s) maximum

The overarching EFSA mission to 'protect human life' would be further bolstered by another value addressing proactiveness. From our perspective, EFSA should make full use of its mandate in terms of scientific advice (article 40, EC178/2002) and communication and risk communication to the public (article 29). This would entail showing more leadership on current issues e.g. establishing thresholds for food allergens and reference doses for labelling of the unintended presence of allergens in food, as well as emerging risks on allergenicity, such as novel foods and the use of recognized food allergens as preservatives, pesticides and as Bio-based Food Contact Materials (BBFCMs) . Examples include the use of some protein contained in milk and eggs to produce packaging materials, edible films and coatings; the use of milk enzymes such as lactoperoxidase as pesticides. These and many more applications of food allergens require thorough, proactive research in order to better understand their dietary effects, including from an allergenicity point of view.

Under the value of Openness (Organisational description), we would like to see an explicit reference that the open dialogue with EFSA Stakeholders will be sustained across the work of the

Authority, and in both directions.

Who we are

5000 character(s) maximum

Who we work with

5000 character(s) maximum

The positive steps in engaging with stakeholders arising from the Transparency Regulation should be further expanded and embedded in all stages of the risk assessment procedure, ensuring the voice of interested stakeholders is represented.

Furthermore, EFSA should work closely with other regulatory authorities such as EMA and ECHA on cross-cutting issues that fall outside the remit of the authority, such as the use of food products in the manufacturing of medicines and the use of food allergens as preservatives, pesticides and in BBFCMs.

How we work

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EFSA should evolve into a hub of accessible, reliable and understandable information on food risk assessment in Europe. Further work on communications is needed, from translating highly technical procedures and opinions into lay language, to establishing the role of EFSA and its products within the broader constellation of bodies deciding on food in the EU.

Moreover, the role of EFSA as a driver of regulatory science in the area of food and in providing support to prevention policies such as labelling should be further stressed here.

EFSA'S Environment

- The big picture
- Evolving dialogue with society
- Food safety – integral to sustainable food systems
- Making the most of the food safety ecosystem
- Harnessing new trends in data, technology and science

The big picture

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The big picture should be explicit in the need to adhere to the principles of the One Health, and the Health-in-all-policies approach as building blocks of the EFSA strategy towards 2027. As patient representatives we would also appreciate a reference to the potential challenges posed by novel foods, green packagings (BBFCMs), consumer and marketing trends (i.e. gluten free), and the health risks arising from these and other shifting consumption patterns. From our perspective, EFSA is primarily looking at food authorisation and the food chain in the EU territory and as such, it is the public authority best placed to also alert and advice when food-related behaviours change as fast as we witness now.

Evolving dialogue with society

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EFSA considers all stakeholders equally and that is a noble principle. However, there should be a distinction between those stakeholder organisations whose membership are the ones subject to EFSA's scrutiny and those who are the subject of EFSA's protection from harm, such as organisations representing people, the civil society and patients, such as EFA who represents people with allergies.

While we welcome EFSA's Stakeholder Engagement Approach with civil society organisations, we encourage the authority to deepen and invest more in the relationship with non-profit civil society organisations representing citizens. EFSA should recognize and resource the advise and expertise given by stakeholders when invited to meetings and working groups. We propose the following addition: In "There must be transparent, widely available information for those interested in understanding EFSA's processes and accessible, **resourced and** independent mechanisms that allow for stakeholders to contribute to its work". Without expense coverage or even daily honoraria, important stakeholder such as EFA will be de facto excluded from some processes due to lack of capacity. Our network is mostly composed of volunteers.

Moreover, we encourage EFSA to follow the European Medicines Agency (EMA) patient and stakeholder engagement principles. The EMA has had active engagement with patients and consumers since its creation in 1995 – now with a working party for patients and consumers and for healthcare professionals. The EMA's experience of early engagement with such stakeholders has been proven to add significant value to its activities, support transparency and improve regulatory processes. Patient and consumer organisations also help to shape information, communication and public messaging to ensure it is optimal, function as effective interlocutors on patient concerns, and as dissemination hubs to their communities.

We believe deepening the stakeholder framework and yearly roundtable setting towards a sustainable stakeholder engagement platform similar to that of the EMA, would enhance the EFSA's public engagement, add to its credibility and help raise public awareness of EFSA as an expert body and a reference point for trustworthy information.

Food safety – integral to sustainable food systems

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EFA and its community of food allergy patients consider food safety of vital importance. One of the prerequisites of food safety is good knowledge and good food management practice across the food chain. While EFSA has considered food management beyond its scope, we encourage the authority to use a soft advisory approach to increase food management standards in the EU. We invite for example EFSA to develop guidelines, reports, or any other valuable tool that would improve food management across the EU, and to systematically engage in the scientific work of the Codex Alimentarius Commission and FAO/WHO in general, alongside the European Commission and the EU Member States delegations.

On a more specific note, we wish to highlight that EFSA has a crucial role to play when assessing the allergenicity of products. Without this work, the provision of accurate information to consumers would not be effective. We therefore call on the authority to explicitly mention in this section the different processes that EFSA undertakes to evaluate the safety of food. We would highly welcome a reference to the systematic inclusion of allergenicity assessments on all food applications, including novel foods, that EFSA conducts before a food product enters the European market. In addition, we think that EFSA has an important role to play in initiating the research, and therefore the evidence base for the definition of reference doses for the unintended allergen presence in food.

Finally, we would highly value an EFSA vision on working with medical societies and professional unions representing healthcare professionals and researchers, as they should be more consulted than they currently are on health issues deriving from food consumption.

Making the most of the food safety ecosystem

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We invite EFSA to make a reference to the need for non-clinical expertise to deliver its mission, such as communications profiles to translate science into regulatory options for policy-makers, and to convey complex data to the general lay population. In this end, EFSA could also take stock of the pool of official stakeholders to fully benefit from the food safety ecosystem, by embracing on a more systematic way the perspective and expertise from interested parties, including the patient/consumer perspective.

Harnessing new trends in data, technology and science

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We cannot agree more with the enormous potential to advance food science that is opening thanks to the development of artificial intelligence, and as an organization representing people with a food-related disease, we welcome any progress that EFSA can do in the direction of allergy prevention, and systems improving food allergy care in the full respect of the current legislation on data protection.

EFSA's 2027 Strategic Objectives: Strategic Objective 1

Strategic Objective 1 - Deliver trustworthy scientific advice and communication of risks from farm to fork.

Expected Outcome 1.1

Expected Outcome 1.2

Strategic Objective 1 - Deliver trustworthy scientific advice and communication of risks from farm to fork.

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An open and lively engagement with civil society can greatly benefit EFSA's reputation in terms of both the output (scientific advice) and the dissemination (risk communication) of its work and in terms of transparency as well. Scientific advice on food safety should take note latest studies and available evidence, and information on risks should be provided with clarity and authority, on the basis of a preventative approach.

Work with civil society and Member States should be tightened to ensure that risk communication reaches all parts of the society in a clear and comprehensive way.

Expected Outcome 1.1

5000 character(s) maximum

EFSA should create an accessible platform that allows stakeholders to easily navigate and share information relating to their expertise. It should also be a place for stakeholders to contact and approach EFSA with questions, to receive quick and up to date scientific information as well as the space for stakeholders to give input throughout. EFSA can work to create a space of

exchanging information while also allowing the outcomes, when final, to be shared with the public by EFSA and stakeholders.

Expected Outcome 1.2

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EFSA should also ensure to regularly update stakeholders on news from EFSA relating to their interests and expertise, as well as create comprehensible risk communication materials for stakeholders to be able to share public information with their networks, for improved transparency on food safety. This should be evidence based and up to date, while also using easy to understand language. EFSA should provide guidelines of how to use and provide supplementary information in case there are follow-up questions or request for more information.

Expected Operational Results 1.1.1

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Engage, along with stakeholders, in an exercise to identify emerging risks and compile all available information on health risks that can be used in future risk assessment activities.

Expected Operational Results 1.1.2

5000 character(s) maximum

Expected Operational Results 1.2.1

5000 character(s) maximum


Enlarge the scope of involvement of civil society through the development of tailored communication material and inclusion of real human perspectives into new promotional tools and platforms.

Expected Operational Results 1.2.2

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Work closer with Member States and civil society to make communication on health risks from food more accessible and understandable, including through the use of social media, dedicated events/webinars and campaigning.

EFSA's 2027 Strategic Objectives: Strategic Objective 2

 Objective 2 - Ensure preparedness for future risk analysis needs Strategic

Expected Outcome 2.1

Strategic Objective 2 - Ensure preparedness for future risk analysis needs

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As the food landscape is in a state of continuous change, EFSA should build capacities that will make it adaptable and future-proof. The authority should always keep an open eye to accumulating evidence related to emerging risks, while developing methodologies to address them timely and effectively. Some examples include establishing thresholds for food allergens and reference doses for labelling of the unintended presence of allergens in food, the novel foods such as insects, chia seeds, exotic fruits, food allergens proteins used to produce packaging materials, edible films and coatings; as well as foods linked to new types of processing e.g. ultra-processed foods etc. EFSA should engage in thorough horizon-scanning identifying potential risks and readily act as health watchdog indicating these risks -including allergenic- that arise from the consumption of these food products.

Strategic Objective 2 - Expected Outcome 2.1

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Expected Operational Results 2.1.1

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Work horizontally with other EU agencies and Commission services to ensure a common risk-averse approach on food-related issues

Expected Operational Results 2.1.2

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Compile evidence on emerging risks e.g. novel foods as they arise in the international bibliography.

Expected Operational Results 2.1.3

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Expected Operational Results 2.1.4


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Add a mention to achieving the WHO non-communicable disease framework.

Expected Operational Results 2.1.5

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EFSA's 2027 Strategic Objectives: Strategic Objective 3

 Strategic Objective 3 - Empower people and ensure organisational agility

 Expected Outcome 3.1

Objective 3 - Empower people and ensure organisational agilityStrategic

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EFA fully supports an empowered EFSA as it is tightly linked with EFSA's claim to scientific excellence and leadership.

Expected Outcome 3.1

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Expected Operational Results 3.1.1

5000 character(s) maximum

Expected Operational Results 3.1.2

5000 character(s) maximum

Expected Operational Results 3.1.3

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Expected Operational Results 3.1.4

5000 character(s) maximum

Other comments

5000 character(s) maximum

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