

Euro Coop Position on the Presence of Acrylamide in Foods

November 2016

Introduction

Acrylamide is a chemical compound that can be found in starchy foods, e.g. French fries, bread and popcorn, as a result of the heat treatment needed to bake or fry these foods. In 2015, the levels EFSA published a “Scientific Opinion on acrylamide in food”¹ which concludes that although data from human studies did not allow for the establishment of dose-response assessments, animal data show that, depending on the exposure to acrylamide, there may be **concerns for carcinogenicity**.

Health and safety concerns regarding the consumption of acrylamide were known to lawmakers and food producers prior to EFSA’s Scientific Opinion. Specifically, the European Commission adopted several recommendations on both the monitoring of acrylamide levels in foods as well as on investigations into the levels of acrylamide in food².

In 2016, **the European Commission proposed a draft Commission Regulation** on the application of codes of good practice to reduce the presence of acrylamide in food. Importantly, this draft Regulation stipulates that measures are necessary to reduce the formation of acrylamide in foods, and that these measures are contained in so called **Codes of Practice** which have been put together by sector organisation in the food industry, by bakery associations, the hospitality industry, and the eating out sector. This draft regulation also puts forward **indicative values** of acrylamide in foods which should be used as an upper benchmark.

Member States will likely be asked **to vote on this legislative proposal** on the 25th of November, day on which the Standing Committee on Plants, Animals, Food and Feed will discuss matters related to the toxicological safety of the food chain.

Euro Coop’s concerns and remarks

Generally, Euro Coop’s members are concerned about acrylamide levels in foods and have been for several years now. This is why **regular controls are carried out to assure that the presence of acrylamide is as low as possible**. Indeed, given that the potentially harmful effects of acrylamide consumption are known, limiting European consumers’ consumption of acrylamide is paramount.

¹ EFSA Journal, 2015. *Scientific opinion on acrylamide in food*. Available [here](#).

² The most recent recommendation on the monitoring of acrylamide levels in food is [Commission Recommendation 2010/307/EU](#), while the most recent recommendation on investigations into the levels of acrylamide in food is [Commission Recommendation 2013/647/EU](#).

Specifically, chemical risk assessment (including acrylamide) is covered in the HACCP and best practices procedures are applied in food production.

Euro Coop acknowledges and welcomes efforts from the European Commission and the food industry devolved into investing and monitoring the levels of acrylamide in foods. Euro Coop also welcomes that the European Commission is proposing a Commission Regulation on the matter. Particularly, Euro Coop is pleased that **adopting a Regulation** will lead to **EU wide harmonisation** regarding the allowed presence of acrylamide in foods, as it will improve trade both within the EU as well as outside of the EU.

However, **Euro Coop does not *per se*** see how consumers will benefit from the European Commission' draft legislative text given that it proposes indicative values that often allow for a much higher presence of acrylamide in foods compared to the actual amount of acrylamide found in foods. Therefore, **Euro Coop would like to express some concerns about certain elements of the draft legislative text** as proposed by the European Commission. These are summarised below:

❖ **A risk-based approach favoured over the use of codes of practices made by sector organisations**

We find this limited. Codes of practice should not solely be the outcome of the work carried out by sector organisations. For the sake of having a balanced input of data, **work carried out by national and international food safety bodies** should also be considered. Information from these bodies should be taken into account even if the bulk of data is less important compared to the one collected by sector organisations.

A **risk-based approach** is key in this context. As such, the codes of practices proposed in the draft legislative text should be used as one of the ways in which Food Business Operators can achieve the desired levels of acrylamide in foods, but **should not** be presented as the one and only way. **The non-negotiable point is that regular monitoring activities assure that these minimal levels are indeed achieved.**

❖ **On control, monitoring activities and enforcement**

The annex of the draft legislative text should include some specification as to whether the **frequency of control and monitoring activities** that are to be carried out by a Food Business Operator should be on the basis of the product or perhaps of the company as a whole. Indeed, Coop Denmark puts forward the instance of a company producing French fries in 50 different flavours, sliced in a different way, with and without skin. The annex states that controls should be carried out for every specific potato-based product. However, in the case mentioned before, such frequent controls may be an unnecessary burden on the company. As such, this legislative text could lay down **prescriptive monitoring frequencies** required in the initial stage of controlling acrylamide levels, while in subsequent stages food business operators may decide on frequency of controls, assuming of course that acrylamide levels are kept to a minimum.

As mentioned in the draft legislative text, **adequate monitoring** of these legal limits is just as important as their establishment. **Enforcement is as important.** This means that competent authorities should set aside the adequate resources to evaluate the monitoring carried out by food business operators and to enforce additional measures if needed.

❖ Consumer education

As a general recommendation, based on the 5th co-operative principle “Education, training and information”, Euro Coop would welcome **raising awareness among consumers about the dangers of high consumption of acrylamide**, as well as about **how home-cooking can be a straightforward way to reduce acrylamide consumption**.

Conclusion

Given the health-harmful effects that acrylamide may have, reducing European citizens’ consumption of this compound is paramount. Therefore, measures should be taken at EU-wide level to reduce the presence of acrylamide to a minimum in foods.

Although Euro Coop welcomes European Commission efforts on the matter, Euro Coop does not fully agree with the use of the codes of practices proposed in the draft legislative text given that they have solely been drafted by sector organisations, and given that **a risk-based approach is overall preferable**. Euro Coop deems it fundamental that **work carried out by national and international food safety bodies** should also be considered. In addition, Euro Coop calls for **adequate enforcement** and **raising awareness about acrylamide among consumers**.

About Euro Coop

Euro Coop is the voice of the co-operative retailers in Europe. Our associations brings together the national associations of consumer co-operatives in **19 European countries**, which represent **4,500 local/regional cooperatives, employing 500,000 citizens** across Europe and operating **36,000 stores** which serve **32 million consumer-members** daily. Euro Coop’s members together are Europe’s second strongest retail force – accounting for € 76 billion in annual turnover from sales.

Euro Coop’s Secretariat in Brussels represents the interests of its members before the European Institutions and facilitates the inter-member exchange between the national associations. More information is available at www.eurocoop.coop.

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