Transparency and Sustainability of the EU risk assessment model in the food chain

Feedback to the European Commission Initiative

Document addressed to the European Commission by SAFE – Safe Food Advocacy Europe ASBL

Introduction

The following feedback paper was drafted by SAFE – Safe Food Advocacy Europe.

SAFE is a non-for-profit independent organisation based in Brussels whose main objective is to **ensure that the consumers' health and concerns remain at the core of the EU's food legislation**. SAFE monitors the EU's food legislation process and cooperates with EU legislators, and with various stakeholders, to draft comprehensive food regulations.

The work of SAFE is supported by its members, which are consumers', food health, obesity and overweight-affected patients', vegan and vegetarian associations, as well as individual members such as independent research scientists, doctors (including oncologists) and nutritionists, spread across Europe (9 EU Member States). To date our membership collectively represents the voice of over 1.050.000 European consumers.

SAFE's missions are:

- **to strengthen the voice of civil society in the EU debate concerning the future of EU food regulation**, thereby reinforcing participatory democracy in the EU. Since its creation, SAFE considerably developed its lobbying and advocacy activities, by taking part in several WG of the DG SANTE such as the Advisory Group for the Food Chain and Animal and Plant Health. SAFE also participated in several meetings and events organised by EFSA and has become an official EFSA stakeholder;
- **to increase public awareness and information on food health and safety issues**, by the means of training programmes and seminars, to allow ordinary citizens to make informed decisions on the food they eat. SAFE regularly organises conferences on EU food law by gathering independent experts, European Commission's officials, NGOs and Foundations, as well as in-school training courses on how to read food labels for sugars and food additives;

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- **to identify priority areas for research and raise funds for independent research on food components with direct consequences on consumers' health**, and on which SAFE builds its advocacy and information material, such as:
    - the information materials aimed at consumers on excessive sugar consumption, food colourings and acrylamide;
    - the feedback on the delegated regulation on total diet replacement for weight control;
    - the position paper on the Declaration of iodized salts' ingredients and iodized salt's exemption;
    - the position paper on the endocrine disruptors and on the Draft Commission acts setting out scientific criteria for their determination in the context of the EU legislation on plant protection products and biocidal products;
    - the position paper on the Draft Regulation on acrylamide in food;
    - the reply to the Commission initiative on Food Contact Materials (FCMs).

1. What are the issues discussed in the European Commission Initiative?

The initiative proposed by the European Commission, titled "*Transparency and Sustainability of the EU risk assessment model in the food chain*", aims at solving the concerns arising when assessing the safety and the security of food and feed products in the European Union. To do so, it is necessary to review the General Food Law Regulation (GFLR)[1], which was adopted in 2002. The GFLR, which already went through a "Fitness Check"[2], created a comprehensive harmonised legal framework, in which EU institutions, Member States and food business operators have a role to play to control the safety of food and feed, hence granting to the EU consumers that the food and drinks available in the EU are safe.

However, the EU did not limit the GFLR to a simple legislative framework organising the safety compliance procedures and the targets to achieve. It went further, establishing the European Food Safety Authority (EFSA) as the EU public and independent risk assessment body for food and feed safety[3]. These characteristics of EFSA have been challenged, last but not least with the European Citizens' Initiative (ECI) "*Ban glyphosate and protect people and the environment from toxic pesticides*"[4] (ECI 'ban glyphosate'). In the ECI 'ban glyphosate', one of the most important request by the petitioners was to "*modify the EU pesticide approval procedure to tackle the transparency and independence of the scientific studies used to support*

[1] Officially the "Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety".

[2] As mentioned in the European Commission Initiative's Roadmap, p.1, and available at: https://ec.europa.eu/food/safety/general_food_law/fitness_check_en

[3] Articles 22 to 49, GFLR.

[4] http://ec.europa.eu/citizens-initiative/public/initiatives/successful/details/2017/000002?lg=en

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authorisation dossiers". Indeed, as argued in the ECI 'ban glyphosate', the current procedures are not allowing the European consumers to benefit from the best results from the food chain, due to various safety concerns on food and feed. This is due to an already diagnosed lack of transparency and independence within the assessment of the scientific studies and data that are used in EFSA's mission is to provide an independent, up-to-date scientific advice and technical support for the EU's legislation and policies in all fields that have an impact on food and feed safety.

The Commission Communication that responded to the ECI 'ban glyphosate'[5] (hereafter, "Communication on ECI 'ban glyphosate'") acknowledged that "*transparency in scientific assessments and decision-making is vital to ensuring trust in the regulatory system. It also attaches continued importance to the quality and independence of the scientific studies that are the basis of the EU risk assessment carried out by EFSA*". Therefore, the Commission agreed to come forward with a legislative proposal by May 2018 covering these issues, as well as other aspects (such as the governance of EFSA), drawing on the results of the Fitness check of the GFLR and after a public consultation. In particular, the Commission aims to adjust the current processes, it will also need to respond to new challenges by increasing the transparency, the accountability and the sustainability of the related risk assessment process.

The issues discussed in the European Commission Initiative are, therefore, in line with the main challenges that are often associated with the GFLR. Clearly, the need to "*improve and clarify the rules on transparency, especially with regard to the scientific studies supporting the risk assessment*", as well as developing a better, more transparent risk communication with the public, as mentioned in the Initiative's Roadmap, is the most public point. It will probably be the one on which the GFLR review will be evaluated. Nonetheless, the increase in reliability, objectivity and independence of studies used by EFSA in its risk assessment and the sustainability of the whole risk assessment model (both financial and scientific) will have to be tackled.

2. Concerns for EFSA's transparency

EFSA has the role of risk assessor in the EU's food regulatory system. Its role is to evaluate food and feed products that require a safety assessment before they can be used on the EU market. EFSA is also tasked with collecting data on food consumption patterns, biological risk, contaminants in food and feed, as well as residues.[6]

[5] Officially the "Communication from the Commission on the European Citizens' Initiative '*Ban glyphosate and protect people and the environment from toxic pesticides*"', dated 12.12.2017, C(2017)8414, available at: https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_glyphosate_eci_final.pdf.

[6] Art.33, GFLR.

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It is important to insist on the fact that EFSA does not perform the scientific studies itself. Its role is to assess the scientific studies (and data-gathering methodologies), relating to a specific question about food and feed safety, that are put forward supporting its safety or opposing it. Concretely, EFSA is tasked to perform an independent scientific peer review of the assessment report produced by designated rapporteur Member State, in cooperation with all Member States[7]. Over the last years, EFSA has been in the spotlight on many occasions, mostly in relation to its lack of independence, transparency *stricto sensu*[8], and (therefore) credibility.

a. Lack of independence

One of the main characteristics of EFSA is to be an independent agency that will assess the scientific studies relating to food and feed safety. As expected, the capacity to gather independent experts, not linked to the industry, has been an issue for EFSA, as well as a strong critique from NGOs. In its roadmap, the Commission also pointed out that distrust over the EU's food regulatory system was due to "*EFSA's evaluations of authorisation dossiers being essentially based on studies, data and information generated (and paid for) by the applicant for authorisation*"[9]. This is because EFSA does not perform the scientific studies on the matter, but it does a peer review on said scientific studies, and it checks those studies' methodology. Under the current procedures, there is the principle that "*the applicant for an authorisation* [must] *provide the scientific evidence supporting it*", which means such applicant will have to spend its own funds in (costly) studies, as those "*will eventually help industry put a product on the market*"[10]. In the absence of independent studies on which to build a comparative analysis, the controlled becomes the controller. While the funding ratio behind this principle is overwhelmingly accepted, the current EFSA's administrative structure has three main consequences on its independence.

The first consequence directly relates to the impartiality of scientific studies and the data collections (which, with the present rules, is always coming from industrial applicants), with which the peer review is performed. It has been decided, as a policy, that private stakeholders cannot be financed with public funds to prove the safety of their own products, considering that they wish to sell such products to have a profit. However, there is an issue regarding the impartiality of "industry-generated studies and data": without independent studies and data to assess the applicants' claim, there cannot be a fair peer review. These provisions are considered as highly problematic by the scientific community. As various members of SAFE (in our scientific panels, we work with many doctors, in particular oncologists, endocrinologists, and nutritionists) have already said on multiple occasions, there cannot be a fair, independent assessment if there is no access to data collections, no independent collection of data, and no

[7] Art.12 of Regulation (EC) n. 1107/2009 concerning the placing of plant protection products on the market.
[8] The concept of "transparency *stricto sensu*" will be used in this document to differentiate EFSA's global issue of transparency (which includes possible conflicts of interest among its personnel) from the administrative issues of transparency (i.e., *stricto sensu*) in a specific dossier (such as the accessibility of documents).
[9] https://ec.europa.eu/food/safety/general_food_law/fitness_check_en
[10] https://ec.europa.eu/food/safety/general_food_law/fitness_check_en

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third-party reviews of data gathered and independent studies. As scientific scrutiny of the studies that underpin the EU policy-making cannot be peer-reviewed and evaluated, due to the lack of independent studies available to the scientific community, no benchmarking or comparative analysis is possible. Such situation results in a serious lack of scientific basis for the European policies and EFSA's authorisation of substances[11]. This will be further developed below, under the "financial sustainability" paragraph.

The second consequence is about the general administrative organisation of EFSA. As the Commission acknowledged in its Initiative's Roadmap, "*in contrast with other EU Agencies, Member States are not represented in EFSA's Management Board and its governance has not been aligned with the Common Approach on EU decentralised agencies*" [12]. In the same document, the Commission warned that the "*high level of scientific expertise*" that should be provided by EFSA is related to "*its capacity to pool expertise from Member States*". Such observations are due to the administrative framework of EFSA. At SAFE, it is considered that this organisation is a serious limitation to EFSA's work, and prevents EFSA to meet its objective to grant to EU consumers that the food and drinks they purchase in the EU are healthy and safe. In fact, EFSA's current rules are making it more difficult to attract new, independent experts, not linked to the applicant (industry) authorisations' requests. However, this is not strongly voiced out in the Commission Initiative's Roadmap. On the contrary, it seems that the main problem is that "*more than two thirds of EFSA's Scientific Panels' experts (69%) originate from six Member States only and the difficulties encountered by EFSA in receiving sufficient support from many Member States to its scientific work*". The origin of the experts should not be considered, as the Commission does, as an issue for EFSA: difficulties arising from a different administrative organisation, when compared to other agencies, are the main problem. It must also be noted that the six more populous Member States have 70.43% of the EU population[13], and that smaller Member States may not have enough personnel to dispatch when asked. Therefore, the Commission and the Member States should elaborate a better network to pool experts when needed and to professionalise more the expertise work done at EFSA.

The third consequence is strongly linked to the previous one: the recruitment process at EFSA has shown a lack of independence, too. In June 2017, after a very long drafting process by EFSA's Management Board, EFSA adopted and published its new independence policy[14], replacing the previous rules (which existed since 2011) that had been criticised by many,

[11] This was clearly mentioned by Christopher J. Portier *et al.*, "Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)", in *J. Epidemiol. Community Health*, August 2016, Vol 70, N°8, pp. 741-745, available at http://jech.bmj.com/

[12] https://ec.europa.eu/food/safety/general_food_law/fitness_check_en

[13] http://www.consilium.europa.eu/en/council-eu/voting-system/voting-calculator/

[14] http://www.efsa.europa.eu/sites/default/files/corporate_publications/files/policy_independence.pdf

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including the European Parliament[15]. This internal policy change was done just in time for the selection of the EFSA's 2018-2021 panel. Although the new policy is a moderate improvement, it did not solve the policy's main loopholes -the ones for which the European Parliament had requested some changes. On one side, EFSA followed such requests for:

- a ban on consultancy contracts for, scientific advice to and managerial positions with regulated companies and organisations funded by them;
- the obligation for experts to declare the proportion of their annual earnings received from "entities with an interest in EFSA's activities";
- the obligation for national experts (sent by national administrations) to file a public declaration of interest;
- the commitment, for EFSA, to publicly explain how it evaluates the interests declared by experts, therefore defining its own degree of independence.

On the other side, various conflicts of interests remain, especially on financial grounds:

- the new independence policy does not use the expression "EFSA's remit" (which is what the European Parliament has been asking since 2014), but keeps the 2011 approach: "only screen experts' interests in the light of the specific mandate of the group the expert is applying to, and not EFSA's remit". In their public discussion, the members of the Management Board evoked a "grey zone" on this point, which will need to be clarified in the implementing rules; so, chances are that the scope of the interests' assessment remains too narrow;
- the European Parliament asked for a "cooling-off period" on industry research funding, but the new policy enforces such period only if those funds exceed 25% of the total research budget managed by the expert and/or his research team... this is a too-high ceiling: it will not prevent an expert receiving research funding from multiple companies from being appointed, provided that no single funding source is above 25% of the expert's total research funding (unless the implementing rules make clear that the 25% threshold applies to all private sector funding considered together);
- public-private partnerships (PPPs) are considered public funding by EFSA's policy, which threatens the independence of the risk assessment of industry's products: it is to be reminded that recent cases of pesticides risk assessment methodologies adopted by EFSA came from EU-funded PPPs where the industry was strongly involved;
- national experts may not be covered by EFSA's independence policy (it will be decided in the Memoranda of Understanding between EFSA and national bodies).

b. Lack of transparency

As stated in the European Commission Initiative's Roadmap, "*Citizens perceive the risk assessment process (and the decision-making based on it) as opaque*"[16]. One of the most important factors to this perception is the plethora of transparency and confidentiality rules

[15] Mentioned in https://www.euractiv.com/section/agriculture-food/news/conflicts-of-interest-continue-to-erode-trust-in-efsa/ and in http://www.foodpackagingforum.org/news/eu-parliament-comments-on-efsas-independence-policy.

[16] https://ec.europa.eu/food/safety/general_food_law/fitness_check_en

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which is applicable to the risk assessment and decision-making process depending on the sub-area concerned. There are similar, but not uniform, rules on confidentiality issues in the various authorisation procedures laid down in EU sectorial legislation, in the GFLR and in Regulation 1049/2001 on public access to EU documents[17]. This multitude of rules, whose difference according to the sector in question may not be fully understood by the EU citizens, contributes to the opacity of the risk assessment process.

The capacity of EFSA to ensure transparency in its procedures entered in a severe conflict with its rules on confidentiality: while EFSA should be open on the scientific studies (including their sources) and on data collections (including the data-gathering methodologies), it must avoid harming intellectual property rights and commercial and manufacturing secrets coming from the applicants. This means that, at the request of the applicant (submitting documents for an authorisation) to EFSA[18], some documents are not available to the public. However, as the applicant is in general the industry and has little interest in rendering any document available to the public, an increasing number of documents has not been made open for public review, up to the point that there are more confidential documents than publicly available documents in EFSA's dossiers. While it is understandable that commercial stakeholders wish little disclosure for their industrial secrets in order to protect their business (as competitors may use it to their advantage), the fact that they also have the full burden of the proof for food and feed safety means that they are enabled to request that the risk assessment documents will not be public.

These provisions are highly problematic for the scientific scrutiny of studies that underpin the EU policy-making as, by definition, a confidential unpublished study cannot be peer-reviewed and evaluated by the scientific community[19]. In fact, EFSA used confidentiality of the source as the main reason to prevent access to many documents, including important sources (in the case of glyphosate, EFSA did not provide a "*complete list of cited supporting evidence*")[20] of research and data that later justified its authorisation decisions. Yet, as constantly reminded by scientists that SAFE solicited to its conferences (both members and non-members of SAFE), disclosing all sources and be based on publicly available evidence is "*a requirement for publication in virtually all scientific journals where financial support, conflicts of interest and*

[17] Regulation (EC) n. 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

[18] Art.39, GFLR: EFSA "*shall not divulge to third-parties confidential information that it receives for which confidential treatment has been requested and justified, except for information which must be made public if circumstances so require, in order to protect public health*".

[19] Christopher J. Portier *et al.*, "Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)", pp. 742-743: "*The use of confidential data submitted to the BfR* ['Bundesinstitut für Risikobewertung', the German Federal Institute for Risk Assessment] *makes it impossible for any scientist not associated with BfR to review this conclusion*".

[20] Christopher J. Portier *et al.*, "Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)", p. 743.

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affiliations of authors are fully disclosed"[21]. As these documents are unlikely to be released, the decision made by EFSA are less and less transparent, strengthening the image of opaque procedures.

This lack of transparency was pointed out recently in many dossiers, but mostly over the one on glyphosate risk assessment. It should be remembered that EFSA refused to share the raw data of three important scientific studies used for the evaluation, justifying its stance by saying that the disclosure of this evidence would undermine corporate secrets and intellectual property rights. After multiple requests, including from Members of the European Parliament (MEPs), as well as by the institution itself, to enable public access to documents, in December 2016 EFSA released multiple blackened documents; the extent of the "hidden" parts of the documents rendered said documents, for the most, useless not just to competitors, but also to the public and to the scientists. EFSA rejected that the documents were not useful, arguing that, when combined with the detailed background documents[22] already published on EFSA's website, the information provided would have been sufficient to enable a third-party scientist to scrutinise EFSA's evaluation of glyphosate.

Nonetheless, in the case of glyphosate as well as on other dossiers, many scientists and experts expressed their concerns on such a system, highlighting that transparency and the ability to question or debate the findings of others are a crucial aspect of the scientific method, which is based precisely on a careful and constant evaluation of raw data of other studies.

c. Lack of credibility

The negative perception on the lack of independence and transparency has clearly affected EFSA's credibility. As said before, it is not credible, for EFSA, to perform a transparent peer review of the applicants' requests for authorisation if there is no public access to documents, if the experts chosen to perform this peer review are not impartial, and if there is a lack of independent scientific studies to perform such peer reviews. EFSA's credibility was called into question on all these issues during the risk assessment for the glyphosate (re)-authorisation, as it was noted in the ECI 'ban glyphosate'.

During the renewal of authorisation for glyphosate, the credibility of EFSA's risk assessment model was dangerously challenged. Last year, at SAFE's 2017 Annual Conference, titled "EU Food Safety Regulation: Putting Consumers First – An overview of current issues and how to increase consumers' protection"[23], participants (which included experts from EFSA) agreed that in most cases, EFSA opinions are well accepted and not contested, there remain portions that are subject to controversy. This was the case with glyphosate's license renewal, as Member States such as Italy, France and Belgium did not trust EFSA's risk assessment and

[21] Christopher J. Portier *et al.*, "Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)", p. 743.
[22] https://www.efsa.europa.eu/en/press/news/151119a
[23] http://www.safefoodadvocacy.eu/about/activities-2017/

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voted against the renovation of glyphosate's license. This behaviour as a particular value regarding the credibility of a European agency such as EFSA, which as such an important role establishing the certainty of food safety for consumers. The lack of transparency and of independence lowers the credibility of the risk assessment, which will be based on uncheckable confidential documents and unpublished industry-funded studies.

EFSA's credibility was affected compared to other international assessment institutions, such as the International Agency for Research on Cancer (IARC), whose *ad hoc* Working Group on the glyphosate (IARC WG) had a different conclusion compared to EFSA's. The latter's assessment on glyphosate has been considered as poorly-motivated when confronted to the IARC WG, as it failed to base itself on publicly available studies, thus rendering impossible to perform peer review, as we already mentioned[24]. It has been debated, in the scientific community, that EFSA incorrectly dismissed evidence as "chance occurrences". It has also made evident that the methods used by EFSA to review studies in the glyphosate assessment regarding historical controls and trend analysis are inconsistent with the EFSA's self-appointed guidelines (made by the OECD and by the European Chemicals Agency Guidance)[25].

3. Concerns for EFSA's sustainability (long-term scientific capacity)

EU risk assessment model in the food chain, and in particular EFSA, have been called into question with regards to their sustainability. Despite the importance of its role, EFSA is under-funded and under-staffed.

a. Financial sustainability

An important issue on EFSA's sustainability is related to its funding. While part of the financing of scientific studies for the assessment of applicants' requests seemed to have been solved by putting the burden of the proof (i.e. providing scientific studies and data) on said applicants (normally private stakeholders, i.e. industry), nothing was foreseen to foster independent studies that could be used in order to peer-review the so-called "industry-generated studies and data". Without open and independent data to assess the applicants' claim, there cannot be a fair peer review. There is a need for an independent research at EFSA level, which can

[24] Christopher J. Portier *et al.*, "Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)", pp. 742-743: "*IARC reviews only publicly available data*".

[25] Christopher J. Portier *et al.*, "Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)", p. 743: "*Two of the most widely used guidelines in Europe are the OECD guidance on the conduct and design of chronic toxicity and carcinogenicity studies and the European Chemicals Agency Guidance on Commission Regulation (EU) No 286/2011; both are cited in the RAR* [Renewal Assessment Report]*. The methods used [by EFSA] for historical controls and trend analyses are inconsistent with these guidelines*"; lower on the same column: "*Ignoring established guidelines cited in their report, EFSA dismissed evidence of renal tumours* […]".

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only exist through an appropriate financing, and which can only subsist through a transparent peer review.

Those who generate food safety data should not be the same commissioning the analysis of such data, in order to ensure scientific independence and credibility of the analysis' results - and, in the end, of EFSA's reports. This is why EFSA should be able to finance independent research, in order to benchmark and perform comparative analyses on the data made available by the applicants (i.e., the agri-food industry). However, to provide funds for the independence of research, EFSA needs to achieve its own economic independence. It is a challenging issue, given the current budget constraints. The best option could be that EFSA will achieve economic independence through "industry tax"[26]. This would be a fixed tax rate to be paid by agri-food industries in order to provide funds that EFSA will allocate to independent researchers that are not related to the agri-food industry sector.

b. Scientific sustainability

Another issue for EFSA sustainability will be its capacity to continue to work as an independent science-based agency. As the Commission warned in its Initiative's Roadmap, the "*high level of scientific expertise*" that should be provided by EFSA is related to "*its capacity to pool expertise from Member States*". It is true that this is a limitation to EFSA's work that could prevent the meeting of EFSA's mission to grant to EU consumers that the food and drinks they purchase in the EU are healthy and safe. It is therefore important that EFSA's rules create the possibility to attract new, independent experts, not linked to the applicant (industry) authorisations' requests. The Commission and the Member States should conceive EFSA and their national agencies as a network where scientists not related to the industry can have a professional career and are incentivised to join EFSA panels as unbiased experts.

Conclusions

EFSA has a very important role in Europe, being the Agency tasked with the review of the analyses and the assessment of risks regarding food and feed. Therefore, it is responsible for the EU consumers' health and safety.

The current risk assessment of EFSA clearly lacks transparency; this can weaken the outcome of the assessment and, consequently, of the political decisions that are build upon. Food safety in Europe is related to the capacity of the European independent agency to carry out a proper assessment on the potential harmful effects of the tested substances. If this risk assessment is not reliable and based on verifiable scientific data, and the EU relies on non-publicly

[26] http://www.safefoodadvocacy.eu/about/activities-2017/; SAFE presented these recommendations to EFSA's conference in May 2017.

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available documents and non-independent experts for such important decisions, then the health of EU citizens is not protected.

It is fundamental for EFSA to regain a serious credibility in the EU. If its work is not deemed trustworthy by the EU consumers nor by independent scientists, it cannot support, in an efficient manner, strong European policies. The glyphosate affair, unfortunately, demonstrated the lack of trust from founding Member States such as Italy, France and Belgium towards EFSA's risk assessment on glyphosate. This is a very risky and dangerous position for the future of EFSA; there is an urgent need to improve EFSA's risk assessment model.

SAFE has already proposed various solutions to the EU risk assessment model's transparency and sustainability, in the area of the food chain. During its last Annual Conference, titled "*EU Food Safety Regulation: Putting Consumers First – An overview of current issues and how to increase consumers' protection*", which took place on March 21st, 2017[27]. How awareness could be raised and how better assessments could be achieved were actively discussed during the conference's workshop, to which several NGOs, industry stakeholders and civil servants from EFSA participated. Confronted to the question "*How can EFSA bring consumers and stakeholders together?*", the participants proposed the following recommendations for EFSA that would be satisfying for both stakeholders and consumers [28]:

- To strengthen the information to consumers and to raise awareness about food components, which should be done by enhancing direct communication via short commercials on social media and on television;
- To provide independent, industry-free information, to consumers;
- To organise forums and discussion that will effectively involve all stakeholders in the risk assessment process, and that should not be just consultative events;
- To strengthen the data transparency, by publishing all research documents from EFSA;
- To provide for the independence of research, thanks to economic independence of EFSA: we propose it to be done through an "industry tax".

[27] http://www.safefoodadvocacy.eu/about/activities-2017/

[28] SAFE presented these recommendations to EFSA's conference in May 2017.

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