

Comments on the White Paper on Food Safety from the Scientific Committee on Plants (submitted 27 April 2000)

The Scientific Committee on Plants discussed the White Paper on Food Safety (SANCO/3578/99) at its Plenary meeting on 17 March 2000, and wishes to make the following outline comments to the Commission as part of the ongoing consultation exercise.

1. The SCP recognises that the Commission has the highest standards of food safety as a key policy priority and that the formation of an independent body that has a clearly defined role, that is open, transparent and integrated as well as being authoritative will make an important contribution to this objective.
2. The SCP also recognises that the underlying principles of food quality and safety need to look forward to avoid potential problems and should not be based only on the past. The proposed Authority should focus on scientific and technical matters.
3. The scope and remit of the proposed Authority should be defined clearly to cover the areas of risk assessment including surveillance, research and the important but under-emphasised area of risk communication and to separate the regulatory activities of risk management which should be outside the Authority.
4. The scope of the proposed Food Authority should be broadened to include the missing but important environmental aspects of exposure. As defined in the White Paper, this will not achieve the wider impact of a Public Health Authority as was originally suggested (Pascal, James and Kemper Document). The Scientific Committee on Plants currently within its mandate includes the risk assessment of the environmental impact of both plant protection products and genetically modified crop-plants since the issue cannot be separated from direct food consumption and consumer safety. It should also be noted that there is a considerable overlap between plant protection products and biocides. The three relevant Directives cover both consumer and environmental safety (Directive 91/414/EEC, Directive 90/220/EEC and Directive 98/8/EC).
5. Central to the Authority will be the independence and quality of the scientific expertise. The current scientific committee structure and remits should be reviewed to achieve greater multidisciplinary co-ordination and redefinition. For example, a separate GMO Committee could deal with all aspects of GM plants and their products, from molecular manipulation, substantial equivalence, GM food and animal feed through to their environmental impact. In order to maintain the input of adequate scientific expertise, further attention should be given to the recognition, remuneration and release of time from home institutions. There may be a case for additional short-term secondments though the uncoupling of scientists from their research environments can threaten their up to date expertise. The SCP strongly recommends that the technical resources and support for the Committees be strengthened to enable them to deal more effectively with the Committees' demanding workloads.
6. It is not clear from the White Paper how the proposed Authority will relate to the existing network of Member State authorities and regulatory agencies. This is seen as essential to ensure that improved risk communication is efficiently and transparently linked to effective risk management in the MS.

7. Opportunity should be taken in the proposed Authority for the closer involvement in and wider dissemination and greater use of the results of the Commission's research programmes in carrying out its risk analysis functions.

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April 2000