

23 August, 2023

Re. Consultation: Amendments to Retained (EU) Regulation 2019/1793: Official Controls Applied to Imported High Risk Food and Feed not of Animal Origin

Dear Sir or Madam

Thank you for inviting comments for this consultation. IFST are pleased that the Food Standards Agency are updating the list of Official Controls for High Risk Food and Feed not of Animal Origin based on scientific risk assessment. Please see below comments on behalf of IFST:

- IFST are unable to comment on the specific changes to the control
  measures for Food and Feed items contained on the list as we are not
  aware of the basis and information on which the individual risk assessments
  have been made, nor the composition and discussions of the expert group
  making these recommendations.
- IFST would recommend that FSA publish the details and data on which the individual risk assessments are made in order that concerned groups can review and comment accordingly.
- Additionally, IFST would recommend that FSA consult with relevant industry and expert bodies representing the relevant commodities to ensure that all available data and understanding of the nature of use, processing etc. is considered when developing these risk assessments.
- It is not clear from the attached documents how the proposed changes to the Official Controls relate to the EU master list published as amendments to 2019/1793. It would be helpful to understand if these (and previous changes) represent divergence from published risk assessments from EFSA.

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Best regards

Stephen French, Ph.D

Scientific Policy Director, Institute of Food Science & Technology

