

Mr. Frans Verstraete
European Commission
Directorate General for Health and
Food Safety
Unit E2: Food Processing
Technologies and Novel Food

B – 1049 Brussels

Ref.: BEUC-X-2016-094/CPE/cm

3 October 2016

Re: Comments to revised draft regulatory measures for acrylamide

Dear Mr. Verstraete,

BEUC, the European Consumer Organisation, welcomes this second opportunity to provide feedback on the draft acrylamide proposals. Following consultation of our members and while acknowledging the improvements made to the draft measures under discussion, **we still see the need for legally binding maximum levels to be set for acrylamide in food.**

Consumer health risks from acrylamide exposure have been known for years and recommendations to reduce concentrations of this chemical in food date back to more than ten years ago¹. Food businesses have had ample time to take action to bring acrylamide levels down. Regrettably, the absence of a downward trend of acrylamide occurrence data in food shows the limits of self-regulation and calls for a bolder approach to tackling this process contaminant.

Tests carried out by our members have regularly found significant variations in acrylamide levels within a given food category^{2,3,4,5,6,7}. This demonstrates that reducing acrylamide concentrations in food is possible so long as food manufacturers are serious about addressing this issue.

In light of the above and with a view to effectively decreasing consumers' exposure to acrylamide, we urge the European Commission and Member States to consider the following approach:

.../...

¹ EFSA first published a statement on acrylamide in food in 2005, suggesting that dietary exposure levels to acrylamide may indicate a human health concern and recommending reducing acrylamide concentrations in food.

² Test-Achats. *Acrylamide : la cuisson joue un rôle*. February 2014. Test-Achats n° 583.

³ OCU. *Patatas fritas: mejores grasas que antes*. June 2012. OCU-Compra Maestra n° 371.

⁴ Test-Achats. *Rien ne vaut une frite maison*. December 2008. Test-Achats n° 526.

⁵ Consumentenbond. *Bak ze niet te bruin*. April 2013. Gezondgids.

⁶ FRC. *Bières artisanales : mises à mal par du malt importé*. June 2016. FRC Mieux Choisir n° 89.

⁷ Altroconsumo. *Irischi delle patatine*. February 2014. Altroconsumo n° 278.

- Today's "indicative values" for acrylamide levels in different food groups shall become **legally binding maximum limits**.
- The existing "indicative values" are outdated and **need revision** before they are transposed into legally binding requirements. We welcome the Commission's proposal to review them in the next months and, subsequently, every three years.
- **Sound and consistent Codes of Practices** are needed, which make it clearer to food businesses that they *have to* apply mitigation measures to avoid or minimise acrylamide formation. Language such as "*when reasonably possible*" or "*should consider*" gives too much leeway to food businesses to ignore the good practices and will also make it difficult for control authorities to verify that the CoPs are effectively implemented.
- Legal limits for acrylamide, once established, shall be **effectively enforced**. We would support the setting by the Commission of harmonised, minimum frequencies of controls by national authorities with a view to verifying that the maximum limits are complied with.
- **Consumer awareness raising campaigns** on how to limit acrylamide exposure from home cooking would be a useful complement to the setting of binding limits. BEUC and our members would be happy to collaborate with the Commission in this respect. It is also important that manufacturers of cooking appliances (e.g. fryers) are targeted as our members' tests^{8,9} have shown that the type of equipment used can have a big impact on the final acrylamide level in food (e.g. home-made French fries).

We remain at your disposal should you wish to discuss this further.

Kind regards,

Camille Perrin
Senior Food Policy Officer

⁸ DECO. *Bem frito sem risco*. February 2013. Proteste nº 343.

⁹ OCU. *Freidoras*. January 2013. OCU-Compra Maestra nº 377.