

ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES

BAOBAB DRIED FRUIT PULP

ISSUE

The Committee is invited to consider the response provided by Phyto Trade Africa to the comments raised at the January meeting and discuss whether this provides sufficient information for the Committee to conclude its evaluation of this novel food ingredient.

**Background**

1. At the January 2007 meeting, Members considered information in relation to this application from Phyto Trade Africa for the approval of Baobab dried fruit pulp as a novel food ingredient (NI) (ACNFP/80/4), and had a number of comments and concerns.
2. A letter detailing the ACNFP's comments on this application was sent to the applicant on 1 February 2007 (see Annex 1) and these are summarised below:
  - (I) **Harvesting.** The Committee noted that there was insufficient information regarding the procedures employed for the harvesting of the fruit and the processing of the fruit pulp, including the depectinised preparation. Members requested that the applicant provide additional information to clarify these points. The Committee also requested that the applicant indicate what quality control measures have been implemented to ensure that damaged or diseased fruit do not enter the food supply chain. Members also noted that 'windfalls' should only be used if additional measures are to be employed to ensure that these are free from soil and other detritus.
  - (II) **Microbial contamination, Shelf life.** The Committee agreed with the Secretariat that the dossier did not accurately describe the extent of yeast and mould contamination and this should be represented. It was also not clear when the yeast, mould and mycotoxin analyses were carried out and the applicant did not specify the shelf life of the NI, nor detail the most appropriate storage conditions. Members requested that this information be provided.
  - (III) **Mycotoxins.** Members requested that the applicant explain why analyses had been carried out to determine whether the mycotoxin, Ochratoxin A, was present in the NI. Members agreed with mycotoxin experts in the Agency that it was more appropriate to test for mycotoxins that are associated with dried fruit (such as aflatoxins), and the applicant should consider carrying out these analyses.
  - (IV) **Routine testing.** Members were of the view that the applicant should consider implementing procedures to ensure that the final products have minimal mycotoxin, yeast and mould contamination.

## **Applicant's response**

3. The applicant responded to these comments on 8 March (Annex 2, 3). The Secretariat wishes to highlight the following points:
  - (I).**Harvesting.** The applicant has supplied details of the harvesting and processing steps for the NI. The Secretariat also notes that the nature of the fruit, which resembles a coconut in hardness, provides additional reassurance that damage during harvest will be minimal. Analyses carried out by the applicant also shows the NI to have minimal contamination with soil and other detritus (Annex 2 p6). The applicant has also detailed the processing used to produce a depectinised pulp (Annex 3 p15), noting that this is routinely carried for a wide variety of fruits. Agency colleagues have also confirmed that the use of pectinases are permitted treatments in the preparation of fruit juice (Directive 2001/112/EC), indicating that the use of pectinases should not give any cause for concern.
  - (II).**Microbial contamination, Shelf life.** The applicant has supplied a number of product specification sheets (Annex 2 Appendix 10) for individual batches of the NI which indicate that there is an acceptably low level microbial presence. The applicant has also sought to explain differences in levels of yeast and mould contamination between fresh and stored batches of the NI. The information supplied indicates that the levels found for both are within those recommended by the UK Health Protection Agency for dried fruit. The Secretariat is seeking clarification from the applicant and Agency Microbiologists regarding this statement, and Members will be updated at the meeting. The applicant has not given a clear indication of shelf life of the NI, but notes that a storage period of 12 months does not significantly alter levels of vitamin C.
  - (III).**Mycotoxins.** The applicant has provided additional information to demonstrate that the NI is free of mycotoxin contamination. The applicant has analysed a number of batches of the NI for the presence of Aflatoxins and in all cases levels were found to be well within permitted maxima. Agency colleagues have advised that, subject to the provision of additional information regarding sample preparation, these values and the methods used to analyse are satisfactory but have advised that the NI should be routinely tested as a precaution. (See response IV, below). The Secretariat will update members at the meeting regarding request for additional sample preparation information.
  - (IV).**Routine testing.** The Applicant has provided the Pre-Qualified Supplier System (PQS) Document (Annex 3). This provides a single reference point for all suppliers to ensure that they harvest and prepare the NI in the same way. In addition the applicant intends to routinely audit different batches of material produced by its suppliers (Annex 3 p 4,5) and has indicated that this will cover moisture levels, microbial load, detection of 'foreign matter' and aflatoxins.

## **Committee Action Required**

4. The Committee is asked whether the applicant's response provides sufficient information and adequately addresses its concerns.

5. If so, the Secretariat proposes to draft an opinion incorporating the ACNFP's comments on Phyto Trade Africa's application which will be discussed at the next Committee meeting in May.
6. If not, the Committee is asked to indicate what additional information would be required.

**Secretariat**  
March 2007

**ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES**

**Letter to the applicant with the Committee's comments (1 February 2007)**

Mr. Cyril Lombard  
PhytoTrade Africa

*By Email*

1 February 2007

Reference: NFU 621

Dear Mr Lombard

### **Application for approval of Baobab dried fruit pulp as a novel food ingredient**

The Advisory Committee on Novel Foods and Processes (ACNFP) considered your application for the approval of Baobab Fruit (*Adonsonia digitata*) as a novel food at their meeting on 17 January 2007.

The Committee were content that the information you provided detailing evidence of use as a traditional food ingredient outside the EU was sufficient to allay fears that the consumption of the fruit would be harmful. On this basis the Secretariat is in a position to begin drafting an opinion, which we will present to the Committee at a forthcoming meeting. However before this opinion can be finalised Members asked for reassurance on a number of points which I have detailed below.

(V) There is insufficient information regarding the procedures the companies that you represent follow during the harvesting of the fruit and processing of the fruit pulp, and the depectinised preparation. You should therefore provide additional information on this aspect and in particular indicate what quality control measures have been implemented to ensure that damaged or diseased fruit do not enter the food supply chain. If 'windfalls' are harvested you should indicate what additional measures are employed to ensure that these are free from soil and other detritus.

(VI) The text of the application dossier does not accurately describe the extent of yeast and mould contamination described in Appendix 5 and this, together with a question raised by a member of the public and advice provided by the Agency's mycotoxin Branch regarding the nature and extent of mycotoxin analysis, was of concern to the Committee. We would highlight the following:

- It is not clear when the yeast, mould and mycotoxin analyses were carried out (ie was it directly following processing, or at regular intervals during storage?) You have also not indicated the shelf life of the fruit pulp and the depectinised preparation, nor detailed the most appropriate storage conditions.
- You determined whether ochratoxin A was present in your novel ingredient. Ochratoxin A is normally associated with cereals and it would be more appropriate to investigate whether mycotoxins normally associated with dried fruit (e.g. Aflatoxins) are present.

The Committee also indicated that in addition to responding to the points described above, you should consider implementing procedures to ensure that the final products have minimal mycotoxin, yeast and mould contamination. This could include the routine analysis of a range of likely mycotoxins.

I look forward to receiving your response to the comments above. Given that the next meeting of the ACNFP is scheduled for 22 March, could you please indicate whether you will be able to respond prior to this meeting.

Yours sincerely

Dr Chris Jones

ACNFP Secretariat

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**Response from the applicant (8 March 2007) (Document 1)**

**ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES**

**Response from the applicant (8 March 2007) (Document 2 – Pre-Qualified Supplier (PQS) System**

