

ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES

KIWIBERRY CONCENTRATE

issue

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

Background

1. At the July 2007 meeting Members considered an application for the authorisation of kiwiberry concentrate (Hardy kiwi, *Actinidia arguta*) as a novel food ingredient (ACNFP/83/5).
2. A letter detailing the ACNFP's outstanding comments on this application was sent to the applicant on 30 July 2007 (see **Annex 1**) and these are summarised below:
 - I. **Allergenicity:** Members were of the view that there was potential for consumers who were allergic to green kiwi (*A. deliciosa*) to cross react with the novel ingredient (NI). In view of this the applicant was asked to consider the provision of additional scientific studies to enable the Committee to be able to determine more accurately the likelihood of green kiwi allergic individuals reacting to the NI.
 - II. **Proposed Food Categories:** Given the concerns regarding cross reactivity, Members expressed concern that the proposed food categories to which the NI is to be incorporated are particularly broad, and include a number of products that do not obviously lend themselves to the addition of the NI. The applicant was therefore asked to give consideration to the food categories and indicate whether it was possible to refine them, in order to minimise the risk of accidental consumption by green kiwi-allergic individuals. The applicant was also invited to identify whether there were existing products containing green kiwi in some or all of the categories as this information may also enable the Committee to better understand the nature of the products and the likelihood of accidental consumption by kiwi-allergic individuals.
 - III. **Labelling:** Members requested additional details of the how products containing the NI would be labelled in order that the consumer is fully informed and is able to avoid them if they have any allergenic concerns. In addition the application dossier states that the hardy kiwi is widely consumed either on its own or in food products outside the EU, and that there is a documented history of safe consumption. In view of this the applicant was asked to provide examples of products containing the NI as this may enable the Committee to better understand how such products would be marketed in the EU, if the NI were to be authorised.

Applicant's response

3. The applicant responded to these comments on 1 August (**Annex 2**). The Secretariat wishes to highlight the following points:

- I. **Allergenicity:** Although the applicant has declined to carry out additional studies this is based solely on their view that the proposed labelling regime (see below) would ensure that all green kiwi allergic individuals could avoid the NI. The applicant contends therefore that any additional data to better inform the committee of the likely extent of cross reactivity are not required because their proposed risk management strategy is adequate.
- II. **Proposed Food categories** The applicant has made minor amendments to the descriptions of the proposed categories which indicate that in all cases the intended products will either be fruit based, or will use the ingredient to flavour an existing foodstuff (eg an alternatively flavoured milk drink). The applicant has not responded to the Secretariat's request to identify whether similar green kiwi fruit products in each category are currently on the market in the EU. The Secretariat notes that there are a significant number of the food products on the market in the EU that contain green kiwi (e.g. fruit mixes, yoghurts etc) but it seems unlikely that kiwi fruit is being, or would be, used in products in all the proposed categories, or that individuals with green kiwi allergy would think of checking labels of all these products for its potential presence.

In discussions with the Secretariat regarding this issue the applicant has stated that, whilst the precise nature of the products in each of the proposed categories are yet to be confirmed, there is no intention to use the ingredient in a product without highlighting its presence. The applicant also suggests that companies wishing to use the NI would in all probability wish to market products specifically on the basis of its inclusion and would therefore highlight its presence.

- III. **Labelling** The applicant expects that it will be a condition of authorisation for all products containing the NI to be clearly labelled in order that individuals who wish to avoid consuming it will be able to do so. The applicant proposes that the name "kiwi" should be included on the label in the same field of vision as the product description / name as well as in the ingredients list. The applicant has also indicated that they would provide customers (ie food manufacturers) with scientific support and information to assist with consumer help-lines etc. The applicant has also indicated that they are happy to provide further data to allergen support groups on request.

The applicant has provided further details of the history of consumption of kiwi berries (as such). None of the products that are mentioned appears to be made using the NI (i.e. the concentrate).

Committee Action Required

4. The Committee is asked whether the applicant's response provides sufficient information and adequately addresses the questions and concerns raised at the July meeting. In particular:

- Does the Committee agree that the existing evidence shows that a proportion of individuals with kiwi fruit allergy are likely to cross-react with kiwiberry and that further data on the incidence of this cross-reactivity, while desirable, is not essential in order to decide on the acceptability of this novel ingredient?
 - Does the Committee agree that the refinement of the proposed food categories, combined with clear labelling, will prevent accidental consumption of the novel ingredient by green kiwi-allergic individuals?
5. If so, the Secretariat proposes to draft an opinion incorporating the ACNFP's comments on Efficas Inc's application which will be discussed at the next Committee meeting in November.
 6. If not, the Committee is asked to indicate what additional information would be required in order to complete its evaluation of this application dossier.

**Secretariat
September 2007**

Annexes attached:

Annex 1 – Letter to the applicant with the Committee's comments

Annex 2 – Response from the applicant

ANNEX 1 to ACNFP/84/4

ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES

Letter to the applicant with the Committee's comments

(30 July 2007)

**Secretariat
September 2007**

ADVISORY COMMITTEE ON NOVEL FOODS AND PROCESSES

Response from the applicant

(1 August 2007)

**Secretariat
September 2007**