

Opinion of the European Economic and Social Committee on the 'White Paper on Food Safety'

(2000/C 204/06)

On 28 January 2000 the Commission decided to consult the Economic and Social Committee, under Article 262 of the Treaty establishing the European Community, on the above-mentioned White Paper.

The Section for Agriculture, Rural Development and the Environment, which was responsible for preparing the Committee's work on the subject, adopted its opinion on 10 May 2000. The rapporteur was Mr Ataíde Ferreira and the co-rapporteur was Mr Verhaeghe.

At its 373rd plenary session of 24 and 25 May 2000 (meeting of 24 May), the Economic and Social Committee adopted the following opinion by 105 votes to one, with four abstentions.

1. Introduction

1.1. The Committee has closely followed the reorganisation of the Commission's services — in the wake of the BSE crisis — with regard to food safety, risk assessment, consumer information and monitoring. It welcomed the 'farm to table' approach advocated by the Green Paper on Food Law⁽¹⁾, and suggested a number of avenues for developing legislation and checks on food safety, while concluding that a general foodstuffs agency such as the United States' FDA was not suited to the European situation. It also called for strengthening of the Food and Veterinary Office in Dublin (FVO) in order to ensure more effective harmonisation of control systems in the Member States⁽²⁾.

1.2. However, when consumer confidence was shaken yet again by the dioxin crisis (before the BSE crisis had completely died down), the Committee considered that further action was needed at EU level in order to fill the continuing gaps in legislation, implementing procedures and checks on the food chain.

1.3. The Committee is pleased to see that the new Commission has given great priority to this subject and has taken decisive steps to reorganise its departments still further by making a single Commissioner responsible for health, consumer protection and food safety. Right at the start of its new

term, the Commission announced a major initiative in this field and its intention to issue a White Paper on Food Safety. Mr Prodi confirmed this positive step when he addressed the ESC's October 1999 plenary session.

1.4. In launching the White Paper, the Commission now proposes to establish an independent European Food Authority (EFA), with responsibilities for: risk assessment (preparation of scientific advice), the collection and analysis of information (food safety monitoring and surveillance programmes), and risk communication (information on food safety issues).

1.5. The guiding principle of future EU food safety policy is that it must be based on a comprehensive, integrated approach.

1.5.1. Other key principles are set out in the White Paper:

1. a clear definition of the responsibilities of the various stakeholders, i.e. primary responsibility should be borne by: feed manufacturers, farmers, fishfarmers, fishermen and food operators; national authorities should monitor and enforce this responsibility; and the Commission, through the FVO, should control the national inspection systems;
2. full traceability of feed and food and their ingredients;
3. involvement of all stakeholders in policy development;
4. application of the three components of risk analysis (comprising risk assessment, risk management and risk communication) and
5. the use of the precautionary principle when carrying out risk management, where appropriate.

⁽¹⁾ Opinion on General principles of food law in the European Union (Commission Green Paper) and Consumer health and food safety (Communication from the Commission), OJ C 19, 21.1.1998.

⁽²⁾ Opinion on the Commission communication to the European Parliament, the Council and the Economic and Social Committee on food, veterinary and plant health control and inspection, OJ C 235, 27.7.1998.

2. General comments

2.1. The Committee has long argued for a comprehensive and integrated approach to food safety in the EU. The past decade was marked by certain food scandals leading to a lack of confidence in food and its safety. The European food chain must be legislated in its entirety — from 'farm to table'. Each link in the food chain must be as strong as the next and the Commission should assure reliable enforcement of Community legislation.

2.2. Although there may not be much that is truly new in the White Paper, it does represent a noteworthy effort by the Commission to rethink food legislation in general and food safety in particular and it is consistent with the principles of the 1997 Green Paper.

Control aspects

2.3. The Committee welcomes the consistent introduction of feedingstuffs in the scope of food safety policy. The Commission's Action Plan should ensure that controls in all sectors at farm level are defined, harmonised and adequately funded.

2.3.1. Surely the point is that controls along the whole chain have to be equally rigorous and enforced. The costs should be properly funded, in order to ensure that both national and FVO inspectors are totally independent and that economic operators co-operate fully and openly in the performance of the tasks allocated to them.

2.4. It is stated that the Rapid Alert System works well for consumer foodstuffs. However, such a statement is of questionable value as experience has shown thus far that this system is not sufficiently rapid and efficient. Improvements are urged in the way crises are managed, including strengthening the Rapid Alert System, which should become the most reliable trigger point in EU risk management mechanisms. The Commission should become fully accountable for the overall performance of this system.

2.5. Meanwhile, on 22 March the European Commission tabled a new proposal to put in place safeguard measures to deal with emergencies on the animal feed sector. This proposal aims to tackle the deficiencies recognised in the existing legislation following the recent dioxin crisis in Belgium.

2.6. The Commission identifies lack of communication and absence of co-ordination as the reasons for slow and late responses from the relevant Member State departments. The

fact is that economic operators prefer to manage crises themselves if they do not trust the authorities to do it in a reasonable, responsible, effective and non-discriminatory manner. The structure of the Rapid Alert System needs to be established in a way that responsibilities are properly assigned to the Member States and other parties involved, and correctly managed. It must be assured that any information forwarded to the Commission will be subject to a rigorous scientific analysis before horizontal control measures are introduced. This should take place with due regard to confidentiality. However, confidentiality should not be an obstacle to proper crisis management.

2.7. An effective RAS is only one element in food crisis management. This management is not satisfactorily addressed in the White Paper on food safety. The Committee believes that there is a need for an effective crisis management procedure at EU level to co-ordinate both the assessment of the risk and its subsequent management between the Commission, the Member States and the third countries, as appropriate. Such co-ordination should also provide a single source for communication with the operators and the public in general. A reformed RAS should be structured in such a way as to be able to tackle: 1. assessment of the risk identified in one Member State by the EFA; 2. discussion between RAS/EFA and the Member State (and company(ies) involved) on the assessed risk and its confinement within a specific area in a confidential manner; 3. if the risk is real then the Commission should provide all Member States with the necessary information about what action to take; 4. feedback from all Member States about actions taken to contain the risk in their countries — without jeopardising transparency.

2.8. In the context of Food Control the Committee would express its support for an appropriate implementation of the subsidiarity principle. However, with regard to the inspections on implementation of EU food legislation and the monitoring of related parallel activities undertaken by the relevant national bodies, it would point out that the Commission is responsible for ensuring that the subsidiarity principle does not jeopardise the goals of the White Paper, namely the scope and benefits of the 'integrated approach' and equal enforcement.

Regulatory aspects

2.9. The success of the measures proposed in the White Paper is intrinsically linked to the support of the European Parliament and the Council. Their implementation will depend on the commitment of the Member States. Legitimate doubts may be cast on the EU's commitment to health protection, at

all levels of decision-making, given its past record and the present inexplicably slow progress in getting the Proposal for a European Parliament and Council Regulation laying down rules for the prevention and control of certain transmissible spongiform encephalopathies and the Proposal for a European Parliament and Council Directive amending Council Directive 91/68/EEC as regards scrapie (COM(1998) 623 final — COD 98/0323-0324)⁽¹⁾ on the statute book. Checking that national authorities are properly applying Community rules and provisions is not, and has not been, easy.

2.10. Existing European legislation is not always enforced efficiently at national level. Implementation is partly fragmented in Member States. The measures taken by the Commission to address these national failures have proved to be insufficient, with the result that consumers have lost faith in EU surveillance mechanisms. Other foodchain stakeholders such as food industry workers, producers, distributors and farmers would also like to see their confidence boosted by the introduction of a food policy based on an integrated approach, with maximum harmonisation at EU level and genuine intervention capability.

2.11. An important factor in the wayward implementation of European legislation is the delay in transposition into national law. Community legislation should, as far as possible, recognise the direct applicability of Community food safety policy instruments, as the Committee has advocated in the case of consumer protection legislation, whenever these instruments contain precise, detailed rights and obligations⁽²⁾. As the Committee has proposed in the past, a Regulation is in most cases the most appropriate legislative tool and it should be used broadly in the framework of Common Market legislation.

2.12. The Committee also notes that the White Paper does not make it clear whether food from the sea (i.e. fish, crab, shell-fish etc.) and aquaculture products are to be included. A coherent food policy should cover all or the vast majority of foodstuffs involved in all links of the food chain, from fisheries to agricultural products. The Committee also notes that no reference is made to the inclusion of drinking water in the scope of food safety legislation and urges the Commission to trigger the necessary procedures to this end.

2.13. A more complex case which is not analysed in the White Paper are the recent differences of opinion between leading scientists — some acting at national level, others at EU level — regarding preventive measures against new variant CJD. The White Paper could have usefully taken a stance or offer some thoughts on this emerging topic, in order to help clarify matters for the general public and for economic operators.

Social dimension

2.14. Within the process launched by the White Paper, the production conditions for non-industrial foods made by small businesses are a particularly sensitive matter. The Commission will have to give subsequent thought to this as part of its global approach, particularly when it comes to revise legislation, bearing in mind the importance of preserving rural food specialities and know-how, without prejudice to food safety rules.

2.15. The Committee points out that the White Paper does not mention the importance of working conditions for ensuring that procedures are carried out properly. When work is badly paid, and when working hours are unsatisfactory and workers are inadequately trained, there is no guarantee that tasks will be performed correctly, as they should be if food safety standards are to be observed as closely as possible. The Committee calls for clear, understandable rules which workers will find easy to apply. Workers must be involved in the implementation of safety procedures, and their representatives should be able to act as whistle-blowers. The Committee has already discussed the perverse effects which crises in consumer confidence have on employment⁽³⁾.

Nutritional aspects

2.16. The White Paper addresses the basic questions of achieving high standards of food safety. As a result of market globalisation and access to food, dietary patterns are starting to converge now. It must be highlighted however that an unbalanced diet and an unhealthy lifestyle, rather than unsafe food, are implicated in some diseases which are expected to increase in the years ahead. There is wide agreement that we are facing the prospect of more rather than less diet-related diseases.

⁽¹⁾ OJ C 45, 19.2.1999.

⁽²⁾ Opinion on Consumer protection and completion of the internal market — CES 1115/91 — OJ C 339, 31.12.1991, and Opinion on The consumer and the internal market — CES 1320/92 — OJ C 19, 25.1.1993.

⁽³⁾ See the ESC opinion on the BSE crisis and its wide-ranging consequences for the EU, in OJ C 295, 7.10.1996, p. 55.

2.17. EU food policy must focus not just on safety but on nutrition and diet as well. Health promotion should play a major role in any discussion of food safety, taking into consideration traditions in national diets. The Committee therefore welcomes the introduction of the question of dietary patterns in the White Paper.

Education and training

2.18. In addition, the ESC believes that campaigns such as the 'Food safety campaign' already introduced back in 1997 could be successfully adapted to the current situation and, eventually, play an important role in public education. Such initiatives should aim to inform and educate European consumers about such complex issues. The Committee invites the Commission when designing such a campaign to give particular emphasis to the education provided at primary and secondary education levels and to incorporate food safety aspects in all health promotion campaigns.

Precautionary principle

2.19. The Commission published its Communication on the precautionary principle on 2 February 2000. Given the importance of this, the Committee will submit an own-initiative opinion on the subject in due course. This opinion's comments on the precautionary principle focus exclusively on food safety related issues. Where appropriate, the precautionary principle will be applied to risk management.

2.20. The application of the precautionary principle solely to risk management does not seem to resolve the matter entirely, as already mentioned in the opinion on the Green Paper⁽¹⁾. It is well known that scientists have to deal with the question of doubt. Their understanding of causes and effects may be called into question at any time, and analyses may be amended accordingly. Therefore, while being free agents, the authors of scientific opinions must bear in mind the relative nature of knowledge when drawing up the conclusions on which the Commission — as the political risk-taker — will base its action.

2.21. A precautionary approach must be the guiding principle throughout all food safety legislation. However, the White Paper does not provide a proper model for applying the precautionary principle. Unnecessary risks should be minimised, but those drawing up and applying Community

legislation must retain an upbeat attitude and must not prevent research or close the door to progress.

2.22. The precautionary principle might in such cases be applied under well-defined conditions within risk management for consumer health protection in the case of unknown risk of a potential hazard while awaiting further results of scientific approach. To this end, the Commission should be able to introduce appropriate safeguard measures.

Agenda

2.23. The White Paper agenda is clear and quite comprehensive. The principles of a food safety policy from 'farm to table' based on traceability and transparency are well defined, and include health protection as a logical objective of all food safety measures.

2.24. Whilst the timetable is ambitious, the question remains whether it is realistic. It is not clear whether the action plan has been laid out in the right order and with the right priorities to achieve the overall goal, particularly as regards the issues which cause most concern to EU citizens.

3. Specific comments — The European Food Authority (EFA)

3.1. In the light of the above comments, and provided that the matters raised in the present opinion are resolved, the Committee supports the establishment of an EFA, to be made responsible for risk assessment and communication.

3.2. The main intention of the White Paper on food safety is to contribute to a high level of consumer health protection in the area of food safety, through which consumer confidence can be restored and maintained. It is intended that this be achieved by application of the principles of independence, excellence and transparency. The authority must demonstrate a high level of accountability to the European institutions, consumers and other foodchain stakeholders.

Resources

3.3. It seems that resources are quite often duplicated. There has been concern that many substances are evaluated simultaneously at international, European and national levels. The Committee hopes that the EFA can help to ensure that available resources are managed more effectively.

⁽¹⁾ OJ C 19, 21.1.1998, p. 61.

3.4. Resources will be the key issue in developing this model, and particularly in maintaining it. Without the provision of adequate public funding it will be difficult to demonstrate independence.

Scientific findings and public opinion

3.5. As regards the scientific basis of risk assessment, the situation would remain as at present, although autonomy will raise the profile and authoritativeness of the intervention process.

3.6. The Committee is pleased to note that the setting up of the new authority marks a break from the tendency for Commission services to be compartmentalised. The Committee has criticised this on a number of occasions. The public may not yet have got over the BSE crisis, the bacterial contamination of foodstuffs, the increasing worries about inappropriate use of antibiotics or the detection of dioxins in foodstuffs; the Committee however welcomes the fact that, by directly involving six commissioners, the Commission has opened the debate on food safety issues.

3.7. The proposed system for informing about risks is perhaps the most positive feature of the new authority. It is true that recently the Commission has made the opinions of the scientific committees available, but since the EFA itself is to publish its opinions, these will reach economic operators, the general public, civil society, and consumer associations in particular. This will do much to strengthen civil society and the involvement of the general public, who will be able to judge for themselves any cover-ups or mistakes in management that flout scientific opinions assessing the risks, as well as the handling of public health protection or the misuse of the precautionary principle. This will do much to improve confidence in the scientific opinion and the understanding of the subsequent management measures.

3.8. The proposed model for providing a structure for delivering world class scientific advice supported by a European network seems appropriate. It will, however, not be easy to accomplish, and the mechanism to achieve this end has not yet been defined.

3.9. Because consumers are not formally involved in the preparation of scientific opinions, the process does not take due account of their interests. But consumers would like to be involved in a dialogue with scientists on food safety issues,

while respecting the principles of confidentiality where appropriate. Consumer involvement could be established by the organisation of regular hearings on the state of scientific evaluations. The Committee believes that it is important to demonstrate transparency by actions and believes that risk communication has an important role to play in this context.

3.10. If the scientific advice is to be of the highest quality and independence, it is essential that the scope of the scientific advisory committees is regularly kept under review and that the relevant experts are appointed to these committees and are adequately sourced. In some areas it may be necessary to appoint experts from outside the EU in order to ensure the highest quality and the right balance of expertise.

Objectives

3.11. The EFA will not be given responsibility for legislation and control (the two components of risk management). Whilst the White Paper does suggest that the authority might extend its competencies in the future, the starting point is a body with little power which appears to be a restructuring of the existing scientific committee arrangements. The Committee is concerned that the EFA does not have sufficiently well defined scope to tackle many of the key issues facing the EU. If improvements are to be ensured, the Committee considers that the EFA should be given involvement in some decision making procedures, always leaving the ultimate responsibility to the Commission, the European Parliament and the Member States. If the Treaty does not allow this, then the Commission should develop an effective model within its own structure until the Treaty is amended.

3.12. The White Paper puts forward a model for a European Food Authority and shows a clear commitment to a food policy extending from 'farm to table' and including the animal feed sector. Nevertheless it is not clear how the management mechanisms of the new authority will guarantee excellence and transparency. The Commission should give detailed indications about the selection procedures and the management instruments of the authority.

3.13. The White Paper seems to defend the status quo regarding the statute and dependence of the FVO, and this would appear to be a weakness of the new system. An independent EFA is still dependent on a Directorate-General which in turn is dependent on the Commission, for the collection of data which should be backed by inspections by the FVO. The authority will not have powers to communicate

directly with the inspection services, nor to seek clarification or additional information when necessary. From a first analysis, the system would appear more consistent if the FVO had functional autonomy, so that the EFA can have its own means of inspection. In this way harmonisation could be achieved, and the Community framework of national control systems would be able to work on the basis of operational criteria set up at Community level, following Community control guidelines and acting with the requisite administrative co-operation.

3.14. The Commission White Paper highlights the principal objectives of the EFA, which are:

- best quality of scientific advice;
- independence from industrial and political interests;
- openness to rigorous public scrutiny;
- scientific authority;
- close co-operation with national scientific bodies.

3.15. In addition to the above, the Committee thinks that the EFA should also pursue:

- a) openness to dialogue with all stakeholders;
- b) highest level of accountability, to be enforced judicially in the event of fraud or serious misconduct;
- c) integrated approach at all levels;
- d) clear definition of structure and management responsibilities;
- e) transparency to achieve the EFA goals;
- f) the role of a centre of knowledge generation, taking account of traditional national specificities.

Functions and methods

F u n c t i o n s

3.16. The Committee believes that the following functions should be assigned to the EFA:

- a) the EFA should be the only body responsible for defining and implementing suitable risk assessment models that enable evaluation of food safety risks;

b) the EFA should play a key role in ensuring that consumers can also be involved in stimulating further fields of action if deemed appropriate. In this context, the EFA should be funded so that it can be proactive rather than purely reactive;

c) the EFA should be confined to questions of food safety and should not extend to environmental issues, if food safety is not involved; its functions should be concerned with food safety aspects of animal welfare, zoonoses, and biodiversity;

d) the EFA should give scientific advice for the approval of novel foods, novel ingredients or novel production methods to the Commission. This includes the provision of risk assessment, utilising the expertise of recognised bodies throughout the Community. Risk assessment should be assigned in a harmonised manner throughout the Community. If necessary, standards or specifications must be established to make this happen;

e) the EFA should have responsibility for assessing the risks of new additives, and flavourings;

f) the EFA should evaluate the safety of pesticide residues, animal medicine residues and contaminants in food;

g) the EFA should establish a Community-based system of collection of nutritional and food consumption data, including the establishment of a surveillance system of diet-related illnesses;

h) the EFA should ensure that health related claims are assessed effectively;

i) the EFA should provide impartial and objective scientific assistance to the European institutions on food safety issues that affect the obligations of the European Union under international trade treaties, including any issues arising from the WTO Disputes Settlement Procedure;

j) the EFA will need to be able to carry out research, monitoring and surveillance, give advice and propose Community action across the entire food chain including in relation to primary agriculture produce. At the other end of the food supply chain, the EFA should ensure the provision of clear and meaningful information to consumers on food and health issues.

M e t h o d s

3.17. Concerning the methods the Committee believes that:

- a) the EFA should clearly communicate risks to the EU public in a way that it is relevant, useful, easy to understand and consistent. It will also be very important that the EFA ensures that risk communication is a two-way dialogue between citizens and the authority so that it can take into consideration their attitudes and perceptions. If this system seems not to be practical, it must be assured that the communication made at national level is consistent throughout the Community;
- b) the EFA should also communicate benefits to health and diet if research has shown evidence of such benefits;
- c) the EFA's relationship and interaction with legislation-making bodies, the Dublin Office and other Community institutions will be vital for its success and for ensuring that food issues are effectively tackled within and across Europe. It is important that the EFA is ultimately accountable to the European Parliament and to the Member States. It will also need to work closely with all the Commission DGs. Its relationship with the other EU agencies is also important, including the EMEA when dealing with borderline products where there may be difficulties determining whether a product is a food or a medicine;
- d) it is important that the EFA develops appropriate working relationships with other international organisations⁽¹⁾. The food supply is increasingly globalised as are the issues that face food policy decision-makers. In addition, the EFA will need to be aware of its international obligations in relation to international harmonisation of standards and ensure that its advice is provided within this context.

3.18. The White Paper refers to 'other legitimate factors' such as the environment, sustainability, animal welfare, food quality, the role of agriculture and industry and the international dimension. However, it must be decided how these interests are to be properly represented and balanced in a food policy in which safety is a primary objective.

3.19. All EFA opinions, once they have been published and forwarded to the Commission, must be followed up with a Communication, to be published within a reasonable timeframe.

3.20. The Committee calls on the Commission to present a proposal for the establishment of the EFA within the deadlines foreseen in the White Paper. In this context, the Committee would like to see the above-mentioned remarks incorporated in the Commission's final text, to take into account the wishes expressed by civil society.

4. Specific comments — Action plan

4.1. The Committee welcomes the Commission's proposed action plan of over 80 legislative proposals set out in the White Paper. There is the scope to review many of the omissions within the current legislative proposals including the need to establish a clear set of safety rules and guiding principles for food legislation. The Committee particularly welcomes the priority accorded to the establishment of a General Food Law Directive to be proposed in September 2000.

4.2. The action plan is ambitious in scope and timing. Priorities are set. There is overall agreement that the Rapid Alert System must be amended and improved independently of the establishment of the EFA.

4.3. The Committee suggests that draft EU legislation on the comprehensive Rapid Alert System and the proposal for a regulation on official food and feed safety controls should be submitted in the first half of 2000 and adopted by the Council by the end of the year, rather than in December 2001 as forecast (see 2.4). The future European Food Authority, which will manage the Rapid Alert System, cannot realistically be set up before 2002, which also underlines the need for a more immediate crisis management system. The crucial importance of strengthening the system of current feed and food controls does not permit such a delay in taking a decision.

4.4. By June 2000 the Commission will adopt the proposal for a Regulation on hygiene for adoption by the Council/European Parliament in June 2002. The Committee believes that all efforts should be made to adopt the draft Regulation in June 2001. Consolidated hygiene legislation, including the appropriate veterinary rules, is a key measure for integrated food safety legislation and cannot therefore be delayed. In the same context, it is necessary to harmonise the existing feedingstuffs legislation with the general hygiene rules to include the principles of Hazard Analysis Critical Control Point System (HACCP) rules and other equivalent methods which are to be EU approved in future.

⁽¹⁾ For example the Food and Agriculture Organisation (FAO), the World Health Organisation (WHO), the World Trade Organisation (WTO), the Joint FAO/WHO Codex Alimentarius Commission and the International Office for Epizootics (IOE).

4.5. Concerning the listed Directive on 'labelling', which is an important means of consumer information, the Committee believes that it is important to consolidate Directive 79/112/EEC in such a way as to modernise the system and to make it consistent and comprehensible for the consumer, with the aim of enabling informed consumer choice.

4.6. Often health claims are made on packaging or in advertising of products without proper scientific documentation, causing improper use and creating unjustified expectations. For this reason, food supplements and fortified foods (point 105 of the White Paper) and herbal products too, should be regulated at EU level as soon as possible, harmonising their definition, labelling and advertising (particularly for claims related to wellbeing and health). Since health claims are not currently regulated at Community level and not mentioned in the action plan, the Committee calls on the Commission to launch consultation on health claims and common practices in different Member States with a view to harmonising the relevant Community legislation.

4.7. The annexed list of measures is, in general, a positive step (see the above-mentioned suggestions for additions). However, the Commission should make a greater effort to consolidate current EU food legislation. If this effort bears fruit, it will contribute to legal clarity and to the efficiency of the entire system, and will reinforce the confidence of the general public. As well as consolidating legislation, it is equally important to update implementing procedures and make adaptations in the light of technical progress and new scientific knowledge. Although the EFA will not have legislative powers, its role will be to support the legislator. The Committee hopes that the Commission will also be sure to fulfil its commitment (point 84 of the White Paper) to simplify and clarify the relevant texts.

4.8. The Committee reserves the right to monitor the legislative programme and will intervene in the legislative process in accordance with the Treaty.

5. Conclusions

5.1. In conclusion the Committee welcomes the White Paper on food safety and supports the actions to be launched.

5.2. The Committee particularly welcomes:

- a) the integrated approach of the food chain;
- b) the strengthening of the EU's operational capacity and the new body (EFA) responsible for risk assessment and communication;
- c) the modernising and simplification of existing food legislation, to create more coherence and to launch new measures where needed.

5.3. On the other hand, the Committee invites the Commission, in the framework of the on-going consultation, to take the present opinion into account when refining the following domains:

- a) Rapid Alert System;
- b) social aspects;
- c) nutritional aspects;
- d) structure and role of the EFA;
- e) risk management capacity of the Commission and the inter-relationship of the EFA with the FVO;
- f) legislation regarding drinking water;
- g) incorporating with the principles governing future food safety rules the domains of aquaculture, fisheries and sea products.

Brussels, 24 May 2000.

The President
of the Economic and Social Committee
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