

# Can Global Harmonisation of Food Legislation be Achieved?

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A little over a year ago, scientists involved in various scientific organisations dealing with food science and technology decided that it ought to be possible to harmonise food regulations and legislation, *i.e.* having the same rules and food laws everywhere on the globe. Two drivers were at the bottom of this thought. Firstly, over the past decennia food has been destroyed too many times for - from a scientific point of view - the wrong reasons. This may continue to happen, whilst there are large populations in the world that suffer from severe undernourishment. Examples are the destruction of food containing minute amounts of mycotoxins or dioxins, far below the concentration that may have any physiological effect and sometimes far below even the natural concentration. This is the result of the "zero tolerance" attitude of regulators who, almost 500 years after Paracelsus, still do not know that toxicity (as well as allergenicity and carcinogenicity) depends on concentration. Secondly, following a number of food safety incidents, consumers get increasingly concerned about the safety of the food they eat. This leads to politicians promising tougher regulations. Whilst at the same time consumers want food that is fresher and healthier, in other words less severely processed. Driven by these consumer pressures, for the past decade much research funding has been devoted to developing technologies that would preserve food with less damage to nutrients and other desirable characteristics than traditional heat treatments. The

sad conclusion is that despite the availability of such technologies, we are far away from applications, or applications are restricted to a limited number of relatively expensive niche products. An important reason is the difficulty in obtaining approval, made more difficult and very costly by the differences in requirements between nations. If the outcome is unknown and knowing that there is a need to apply for the same purpose in many regions, investing in applications of new technologies may easily be conceived as too large a risk or simply too expensive.

As a result, in July 2004, EFFoST and the International Division of IFT launched the Global Harmonization Initiative (GHI), with the goal "Achieving consensus on the science of food regulations and legislation to ensure the global availability of safe and wholesome food products for all consumers". Soon the GHI was joined by many other scientific organisations, including IUFoST (of which EFFoST is a regional grouping), the Food Chemistry Division of EuCheMS, the Federation of European Microbiological Societies and EHEDG. Thanks to the participation of two publishers, *Food Safety Magazine* and *Elsevier Science*, the GHI has received much attention and is growing rapidly.

Do the participants in GHI really believe that global harmonisation is achievable? The answer is yes, although it is not the intention of the participants to themselves propose changes in regulations and legislation. Rather, their aim is to obtain a scientific consensus on issues that underpin regulations. It is assumed that

publication of consensus statements will help regulators to draw up new regulations or propose changes to existing regulations and laws. The GHI will not repeat work already done. To the contrary, where statements based on scientific evidence exist, they will be reviewed and most likely often be adopted as DRAFT consensus statements. Such statements may originate from organisations such as Codex Alimentarius, the International

Commission for the Microbiological Specifications for Food (ICMSF), the European Food Safety Authority (EFSA) and the International Life Sciences Institute (ILSI). The GHI therefore is very pleased with the participation of scientists involved in these and other organisations with similar goals. It may be important to explain that the GHI is not after obtaining a consensus between scientific organisations or any official bodies, but is after a consensus between individual scientists, regardless of their affiliations. This leads us to one of the most important but at the same time perhaps most difficult tasks for the GHI group: how to identify the real scientific experts and how to ensure they will be able to participate in an independent way.

Meanwhile, there has been a range of GHI meetings, including symposia and workshops, in places such as Las Vegas, Warsaw, Lisle, New Orleans and Hamburg. Reports on these events and presentations can be found on the website [www.globalharmonization.org](http://www.globalharmonization.org). This has resulted in a draft Charter (see Figure 1). For the time being it will remain a "draft" because in line with our goal, we would like to start with a global consensus on the charter and therefore invite and welcome comments. This, however, does not mean that for the time being the GHI remains inactive. The process to identify relevant scientific organisations has been started. These organisations will be requested to inform their members about the GHI and to invite



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#### CHARTER

The goal of the initiative is to ensure the global availability of safe and wholesome food products for all consumers.

To achieve this, undue barriers to free trade that masquerade as food safety protections must be vanquished. Such barriers include differences in regulations and legislation between countries globally. The international scientific community must, therefore, work towards achieving global consensus on the science underpinning food regulations and legislation. This will be achieved through attainment of the following objectives:

1. Identifying relevant scientific organisations
2. Inviting and encouraging the participation of these scientific societies in the global harmonisation initiative and inviting their members to join in this activity in their field of expertise.
3. Identifying relevant non-scientific stakeholders
4. Establishing effective communication between non-scientific and scientific organisations.
5. Inviting all stakeholders (organisations and individuals) to identify and submit key issues requiring attention.
6. Prioritising key issues with the subsequent formation of working groups to draft white papers or consensus statements regarding the scientific validity of these issues.
7. Steering working groups to assess the best available evidence and discuss their findings with the scientific community, working towards building consensus.
8. Publishing results on a per issue basis in journals, magazines and newspapers.
9. Publishing collections of resulting consensus statements in book form
10. Presenting results and participating in appropriate conferences
11. Making results available to all stakeholders, particularly those responsible for developing or amending regulations and legislation, global communicators, risk managers and assessors.

All of these will be done in an open, transparent manner, to avoid bias or the appearance of bias, political or otherwise.

Figure 1. Draft GHI Charter

them to sign up. Several discussions took place on the identification of experts. The initiative would fail if everybody could sign up as an expert on everything that he or she feels is something to be influenced. It is imperative that evidence is provided. In the near future the website will display a *proposal* for unbiased and impartial identification of experts - again for comments.

Another activity that has been started is developing the consensus "operation procedure". The first step will have to be the identification of issues and then their priority. Self-evidently, proposed issues must be presented with justification and any opinion on an issue must be accompanied by evidence. The follow up to this process, may depend on the availability of experts as working parties need to be set

up to evaluate the evidence provided. There will be a stage when a DRAFT consensus statement can be produced for circulation among all other experts on the subject and for publication on the GHI website. The next phase may be quite effort intensive, as replies need to be classified and evaluated and the process may have to be repeated several times. That is where the GHI will have to deal with an additional problem: financing such activities. Like the Charter, and the Expert selection procedure, the proposed operation procedure too will be published on the website for comments. So far, all the GHI work

is done by volunteers who believe that the initiative is worth the effort, but it is envisaged that for success, funds are required as staff will be needed to deal with the necessary correspondence and archiving. Here the GHI group faces a severe difficulty. Although stakeholders may play a role in providing issues and submitting evidence, the GHI group needs to be independent of stakeholders and therefore cannot and will not accept financial support from the stakeholders. How then to solve this problem? After considerable debate, it has been decided that support from scientific organisations is essential and would not affect impartiality. Recognising that scientific organisations are unlikely to have the funds to finance the entire operation, these organisations may

decide to attempt to raise funds from, for example, governments, industries, charities and individual members in any way, to secure resources required. Provided, however, that the organisations will in no way press the GHI to focus on specific issues on the behalf of any pressure group. The GHI should be kept unaware of the stakeholders that provide financial support to the scientific organisations. The reason that stakeholders would support the initiative despite not being recognised as such should lay in the fact that they are stakeholders, i.e. they will eventually benefit from global harmonisation of food regulations and legislation. In line with the (draft) GHI Charter, any funding received by the GHI will be fully justified on the GHI website and be open to inspection by participating scientific organisations. ■

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**Dr Huub Lelieveld spent much of his working life with Unilever and has over 40 years experience in industrial microbiology, bioprocessing and food technology. He is the author and editor of publications on microbiology and food science and technology including the Handbook of Hygiene Control in the Food Industry.**

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