

Johannes Heeg (foodwatch)

Von: [REDACTED]@efsa.europa.eu> im Auftrag von [REDACTED]@efsa.europa.eu>
Gesendet: Montag, 17. Juli 2017 17:17
An: Johannes Heeg (foodwatch)
Cc: [REDACTED]
Betreff: RE: Submission of Data on MOSH/MOAH in Food

Kennzeichnung: Zur Nachverfolgung
Kennzeichnungsstatus: Gekennzeichnet

Dear Mr. Heeg,

I would like to inform you that the data collection has opened on the 15th May and it is still open. Thus, incoming data from 19 May onwards have not been processed yet for validation and analysis.
Please find below the answers (in green) to your questions:

1. Since your email of 19th May, has EFSA received any data on MOSH/MOAH? (Yes)

If yes:

2. By which group of actors (member state, food business operator, manufacturer or any other party) has EFSA received data? (After the 19th May 2017, we have received data on MOSH/MOAH only from one food business operator.)
3. When has the data been submitted and by whom specifically? (The date of arrival of the data is 05/07/2017. We cannot reveal the name of the sender because it is considered as sensitive information.)
4. Has the data been submitted in the electronic reporting format as set out by EFSA for compilation into a single database? (Yes)
5. What's the number of data records of each file received? (There is a single file of 1620 records)

Kind regards,

[REDACTED]
Evidence Management Unit (DATA)
Risk Assessment and Scientific Assistance Department



European Food Safety Authority
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Tel. +390521036826
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linkedin.com/company/efsa

From: Johannes Heeg (foodwatch) [mailto:johannes.heeg@foodwatch.de]
Sent: 13 July 2017 15:32
To: [REDACTED]
Subject: AW: Submission of Data on MOSH/MOAH in Food

Dear Mr [REDACTED]

thank you very much again for your email of 19th May in which you stated that since July 2016, EFSA has only received additional data on MOSH/MOAH from BVL Federal Office of Consumer Protection and Food Safety Germany. Today, I would like to renew my questions:

1. Since your email of 19th May, has EFSA received any data on MOSH/MOAH?

If yes:

2. By which group of actors (member state, food business operator, manufacturer or any other party) has EFSA received data?
3. When has the data been submitted and by whom specifically?
4. Has the data been submitted in the electronic reporting format as set out by EFSA for compilation into a single database?
5. What's the number of data records of each file received?

Once again I want to stress out that we do not demand access to these documents which is why we do not reach in a PAD request to your legal department. Our aim is to understand who is following the EU COM monitoring recommendation and who isn't. Therefore, the only information we would like to get from you is if any data on MOSH/MOAH has been submitted since our last correspondence and if yes, by whom.

I would highly appreciate if this information could be shared until Monday, 17th July, without applying the PAD timeline of 15 working days.

Thank you very much in advance
Johannes Heeg

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Von: [REDACTED] efsa.europa.eu **Im Auftrag von** [REDACTED]

Gesendet: Freitag, 19. Mai 2017 18:00

An: Johannes Heeg (foodwatch)

Cc: [REDACTED]

Betreff: RE: Submission of Data on MOSH/MOAH in Food

Dear Mr Heeg,

Thank you for your e-mail of 10th May. In reply to your questions below, we would like to refer to your request for access to the data handled by EFSA in 2016. EFSA has replied in three batches as it results from the enclosed correspondence.

As concerns your questions, please see the replies as follows in **green**:

1. We are aware that when EFSA was requested to prepare the Scientific Opinion of the CONTAM Panel, an ad-hoc call for data on mineral oil hydrocarbons (MOH) was issued in 2010 and the data received are those that were included in the Scientific Opinion. Since 2010 MOH were included in the permanent call for data on chemical contaminants. **Has EFSA ever since received any data on MOSH/MOAH?**

EFSA received the data on MOSH/MOAH that was indicated in the correspondence exchanges with you last year as it results in the enclosed letters.

In addition, since July 2016, after the last letter sent to you on this request, more recently EFSA received additional data from Germany.

If yes:

2. By which group of actors (member state, food business operator, manufacturer or any other party) has EFSA received data? EFSA only received data from the BVL Federal Office of Consumer Protection and Food Safety, Germany;
3. When has the data been submitted and by whom specifically? EFSA received the data on 08/09/2016.
4. Has the data been submitted in the electronic reporting format as set out by EFSA for compilation into a single database? The data was submitted in Excel files but not in electronic reporting and SSD format.
5. How many individual **dates** on products do the submitted datasets comprise? Your request is not very clear. However, assuming that the question number 5 is referring to the number of data records of each file received, there are two files of 22 and 84 records. If this is not the reply you were expecting, please clarify your request.

We trust the above addresses your questions.

Yours sincerely,

[REDACTED]
[REDACTED]

Evidence Management Unit (DATA)
Risk Assessment and Scientific Assistance Department
European Food Safety Authority (EFSA)
Via Carlo Magno 1/A, 43126 Parma, Italy
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From: Johannes Heeg (foodwatch) [<mailto:johannes.heeg@foodwatch.de>]

Sent: 10 May 2017 10:24

To: [REDACTED]

Cc: [REDACTED]

Subject: AW: Submission of Data on MOSH/MOAH in Food

Dear [REDACTED]

referring to EFSA's permanent call for data on MOSH/MOAH and being aware of the Commission Recommendation (EU) 2017/84 of 16 January 2017 on the monitoring of mineral oil hydrocarbons, foodwatch is happy to share with you its data on MOSH/MOAH. Please find attached the data of the analysis of 120 dry food products with a long shelf life, for which migration levels are typically the highest (e.g. Cornflakes, Pasta, Rice etc.). As mentioned in my previous email, we have tested products packaged in cardboard with and without inner bags. The products have been purchased in France, the Netherlands and Germany. As required by EFSA, we have inserted the data into the Generic Reporting Format. In case you have any questions, please do not hesitate to contact us.

foodwatch is highly interested in the continuation of the call for data and EFSA's data collection on MOSH/MOAH. In this context, we are highly interested in the answers to the following questions:

1. We are aware that when EFSA was requested to prepare the Scientific Opinion of the CONTAM Panel, an ad-hoc call for data on mineral oil hydrocarbons (MOH) was issued in 2010 and the data received are those that were included in the Scientific Opinion. Since 2010 MOH were included in the permanent call for data on chemical contaminants. **Has EFSA ever since received any data on MOSH/MOAH?**

If yes:

2. By which group of actors (member state, food business operator, manufacturer or any other party) has EFSA received data?
3. When has the data been submitted and by whom specifically?
4. Has the data been submitted in the electronic reporting format as set out by EFSA for compilation into a single database?
5. How many individual dates on products do the submitted datasets comprise?

We would highly appreciate an answer until **Tuesday, May 16, 2017**. Thank you very much in advance.

Kind regards
Johannes Heeg

Nein, Sie bekommen dafür keinen 5-Euro-Gutschein – aber viele unbezahlbare Informationen.
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Von: [REDACTED] [\[REDACTED\]@efsa.europa.eu](mailto:[REDACTED]@efsa.europa.eu) **Im Auftrag von** [REDACTED]
Gesendet: Donnerstag, 16. März 2017 16:38
An: Johannes Heeg (foodwatch)
Cc: [REDACTED]
Betreff: RE: Submission of Data on MOSH/MOAH in Food

Dear Johannes,

Thank you for your kind offer to send MOSH/MOAH data to EFSA, your contribution to EFSA's data collection activities is very much appreciated.

We understand that this is the first time you have sent data to EFSA so may require some support in doing this? As you have rightly indicated in your message below, the data should be inserted into the 'Generic Report Format' available at the link given below. There are some instructions here that briefly explain what to do; that is download the files, save, enable the macros etc.

After all the data has been inserted into the Generic Reporting Format, please send it to data.collection@efsa.europa.eu. We will take care of converting the data into a standardised format and inserting it into our database.

If you experience any difficulties with completing the 'Generic Reporting Template' please do not hesitate to contact us at data.collection@efsa.europa.eu and we will respond to you. If necessary we can offer a small training via teleconference to assist you.

Please do not hesitate to contact us with any questions you may have and we very much look forward to receiving your data.

Kind regards

██████████

On behalf of data collection

From: Johannes Heeg (foodwatch) [<mailto:johannes.heeg@foodwatch.de>]

Sent: 15 March 2017 15:36

To: ██████████

Subject: WG: Submission of Data on MOSH/MOAH in Food

Dear ██████████

thank you again for the interesting phone call today. Please find below the email that I have sent to the address ██████████ [@efsa.europa.eu](mailto:██████████@efsa.europa.eu) about two weeks ago. I would very much appreciate if you could forward the email to the person in charge.

Best regards

Johannes Heeg

Nein, Sie bekommen dafür keinen 5-Euro-Gutschein – aber viele unbezahlbare Informationen.

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Von: Johannes Heeg (foodwatch)

Gesendet: Dienstag, 28. Februar 2017 11:40

An: ██████████ [@efsa.europa.eu](mailto:██████████@efsa.europa.eu)

Betreff: Submission of Data on MOSH/MOAH in Food

Dear Sir or Madam

foodwatch is aware of the Commission Recommendation (EU) 2017/84 of 16 January 2017 on the monitoring of mineral oil hydrocarbons in food and in materials and articles intended to come into contact with food and the call for data on MOSH/MOAH. We appreciate that the issue is taken serious by the European Commission and would like to contribute to the data collection.

foodwatch is an independent, non-profit consumer rights organization. Since 2015, we have tested 192 products on MOSH/MOAH. All tests have been carried out by laboratories accredited to DIN EN ISO 17025, using the on-line HPLC-GC-FID method in accordance with the German Federal Institute for Risk Assessment (BfR) compendium on the determination of mineral oil hydrocarbons in food and packaging materials ("Messung von Mineralöl-Kohlenwasserstoffen in Lebensmitteln und Verpackungsmaterialien"). In 2015, our laboratories have tested 120 dry foods with a long shelf life, for which migration levels are typically the highest (e.g. Cornflakes, Pasta, Rice etc.). We tested products packaged in cardboard with and without inner bags. The products have been purchased in France, the Netherlands and Germany. The laboratory did not only analyze the food itself but also the MOSH/MOAH content in the packaging. In 2016, we have carried out 72 further product tests, mainly fatty products such as chocolate. In 2016, we have not analyzed the MOSH/MOAH content in the packaging.

You can find the products tests as we have published them under the following links (reports are in German, my apologies for not having an English translation):

http://www.foodwatch.org/uploads/media/Testergebnisse_Mineraloele_in_Lebensmitteln.pdf

https://www.foodwatch.org/fileadmin/Themen/Mineraloel/Dokumente/2016-03-23_foodwatch-Test_Schoko-Osterhasen-Mineraloel.pdf

https://www.foodwatch.org/uploads/media/foodwatch-Test_Mineraloel_Juni_2016_FINAL.pdf

https://www.foodwatch.org/uploads/media/2016-07-04_Mineraloele_in_Schokolade_und_Chips.pdf

https://www.foodwatch.org/uploads/media/2016-12_Test_Mineraloele_Weihnachtsschokolade.pdf

I would appreciate if you could answer me the following questions:

- Is EFSA interested in the submission of the above mentioned data?
- If so, we would in a next step contact our laboratories to entry the data into the reporting format. On <https://www.efsa.europa.eu/en/data/toolbox>, there is a link to the "MS Excel® Simplified Reporting Format". Is this the format that we are supposed to use?
- The link to "MS Excel® Simplified Reporting Format" on the EFSA website leads to a file named "Generic Reporting Format" (<https://www.efsa.europa.eu/sites/default/files/assets/GenericReportingFormat.xls>). Is this the correct simplified reporting format?

Thank you very much for your support.

Kind regards

Johannes Heeg

Nein, Sie bekommen dafür keinen 5-Euro-Gutschein – aber viele unbezahlbare Informationen.

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