

## FEDIMA position on Acrylamide in baked goods and bakery ingredients

FEDIMA acknowledges the role of the bakery sector in initial acrylamide content and welcomes measures in favour of the mitigation of acrylamide formation, following the "As Low As Reasonably Achievable" (ALARA principle).

With a view to follow EU Regulation<sup>1</sup> on acrylamide mitigation measures, and to reduce as much as technically achievable the acrylamide formation in baked products, FEDIMA members can provide support to their customers in setting up adequate mitigation measures where possible and/or applicable, as indicated in GUIDANCE ON THE IMPLEMENTATION OF COMMISSION REGULATION (EU) 2017/2158<sup>2</sup>. At the same time, FEDIMA would like to highlight the following points:

- **FEDIMA supports the maintenance of the nutritional quality of baked goods**  
Measures to reduce acrylamide formation can impact the final product quality, organoleptic characteristics, consumer acceptance or nutritional quality. The impact on the nutritional quality should be considered carefully when implementing measures to reduce acrylamide<sup>1,2,3</sup>. Alternative mitigation measures should be considered prior to mitigation measures impacting the nutritional quality of the final goods (e.g. wholegrain reduction).
- **Acrylamide formation further down the food production chain**  
FEDIMA members are aware of the potential impact that some ingredients they manufacture and/or trade may have on acrylamide formation during processing, such as (bread) baking. Still, FEDIMA members cannot be held responsible for the further processing of their customers that might result in acrylamide formation in the final baked goods.

FEDIMA welcomes Commission Regulation (EU) 2017/2158 that is based on the EFSA risk assessment of acrylamide. Since the size of risk is still under investigation by EFSA, FEDIMA supports the Maximum Benchmark Levels (MBLs) that are imposed by the present regulation, allowing the bakery sector to implement measures to mitigate acrylamide formation while having the least compromise on consumers' expectations. Until the investigations by EFSA are finalised, Fedima deems Maximum Levels not appropriate.

<sup>1</sup> Commission Regulation (EU) 2017/2158 of 20 November 2017 establishing mitigation measures and benchmark levels for the reduction of the presence of acrylamide in food: <https://eur-lex.europa.eu/legal-content/GA/TXT/?uri=CELEX:32017R2158>

<sup>2</sup> Guidance on the implementation of Commission Regulation (EU) 2017/2158: [https://ec.europa.eu/food/sites/food/files/safety/docs/cs\\_contaminants\\_catalogue\\_acrylamide\\_guidance-doc\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/cs_contaminants_catalogue_acrylamide_guidance-doc_en.pdf)

<sup>3</sup> Scientific Opinion on acrylamide in food, EFSA Journal 2015 13(6):4104: <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4104>