



4:00 PM

June 8, 2004

**Statement before the
FDA Food Advisory Committee
Contaminants and Natural Toxicants Subcommittee
Meeting
June 8, 2004
by
Richard Jarman
Vice President, Food and Environmental Policy
National Food Processors Association**

**NATIONAL
FOOD
PROCESSORS
ASSOCIATION**

Good afternoon, my name is Richard Jarman. I am the Vice President for Food and Environmental Policy at the National Food Processors Association (NFPA).

NFPA is the largest trade association representing the food and beverage industry in the United States and worldwide, serving as the industry's voice on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumers affairs.

NFPA has closely followed FDA's initial examination of the presence of furan in a variety of foods and drinks and our efforts have included the development of analytical methods, which have been compared with FDA's method, for measuring furan in various food matrices. I will touch on the analytical issues we have encountered in a moment.

In May, when FDA announced the results of its exploratory work on furan, important information for understanding the implications of the preliminary findings was provided and the need for additional work was clearly and appropriately indicated. NFPA believes FDA was and is justified in stating that consumers should not alter their diets based on the Agency's initial findings and that until more is known existing federal dietary guidance should be followed. NFPA applauds FDA for its efforts to explain available information about furan and furan in foods in a manner that does not create an unnecessary and unjustified "food scare." We urge FDA to continue to help consumers understand that finding very low levels of furan in a variety of foods and drinks does not in and of itself mean there is a dietary risk and that consumers should continue to follow established dietary guidelines and eat a healthy, balanced diet consisting of a wide variety of foods in moderate amounts.

It is also important that consumers understand, as indicated by FDA, that the exploratory findings related to furan in foods and drinks should not be interpreted as the risk associated with eating any particular food or individual brand. FDA appropriately explained that the fact that certain types of foods or brands are included in this study does not indicate an Agency concern about these particular foods and that more information must be collected and evaluated to determine if there is any public health significance to finding low levels of furan in many different foods.

1350 I Street, NW

Suite 300

Washington, DC 20005

202-639-5900

WASHINGTON, DC

DUBLIN, CA

SEATTLE, WA

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I would like to briefly make several points in the time available:

First, analyzing for furan in foods poses a significant challenge and attention must be given using methods that are both standardized and validated. A study of methodology involving three laboratories, including NFPA and FDA, using three different methods applied to analyzing four foods, gave results that were generally in agreement. However, we also found a relative standard deviation of 30-43% between laboratories and about 20% repeatability within a laboratory. Clearly, any data on the level of furan in food must be considered in terms of the analytical method used and care should be given not to attribute undue precision to analytical results when considering differences in reported levels.

Second, more information is clearly needed on the mechanism of formation. Preliminary research indicates temperature is an important factor with "boiling" temperatures not appearing to generate detectable levels of furan, while temperatures reached in "browning," pressure-cooking, and microwave cooking all appear to produce furan. Also, both carbohydrates and proteins appear to be involved as precursors.

Third, more information on the the range of furan in foods as consumed is needed. FDA's exploratory research focused on commercially prepared jarred and canned foods. A thorough characterization of possible exposures should include consideration of commercially processed and foods prepared at home and in restaurants, including reheated foods. The effect of home cooking, restaurant cooking, and reheating on possible furan formation and subsequent levels needs to be better known and understood.

Finally, and perhaps most importantly, it is critical that FDA establish a solid basis for evaluating the risk from low levels of furan in a wide range of foods and drinks. NFPA commissioned a food intake analysis using the results of FDA's preliminary work. This assessment performed by the firm Exponent indicates that 97% of the US population is exposed to low levels of furan from foods representing 20% of the dietary intake of protein or calories. Clearly, the determination of what, if any, risk furan poses will have huge implications for diets and, possibly, food preparation.

As the Committee and FDA know, furan represents one more naturally occurring substance in food that is receiving attention as the result of targeted analysis for the presence in food combined with toxicological evidence obtained from animal bioassays using high levels of exposure. We urge the Agency to carefully consider furan, and other like substances associated with accepted food preparation practices, in terms of risk-risk tradeoffs. We must be certain that the benefits of food safety

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provided by adequate thermal processing are not compromised to address hypothetical risks determined through the application of limited toxicological evidence from animal models.

The risk posed by low levels of furan in foods and drinks needs to be assessed and put into perspective before concluding risk management steps must be taken.

Again, we applaud FDA for the open and thoughtful approach being taken in developing a meaningful, scientifically-based plan for dealing with the finding of furan in foods and for providing appropriate and reasonable guidance to consumers.

We recognize that furan is one more of what may be a growing number of compounds that can be found in foods due to accepted food preparation practices. Now may be the time for finding an alternative approach for dealing with naturally produced compounds in foods that pose no or insignificant risk to public health. It is clear that for compounds like furan and acrylamide current risk assessment approaches may clash with advances in science and risk management decision-making needs. We urge FDA to take a lead role in developing a new framework for assessing risks, risk/risk tradeoffs, and comparative risk/benefit tradeoffs for exposures to low levels of naturally occurring compounds in foods.

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