



Athan Gadanidis <fetachi@gmail.com>

EU 432/2012 health claim labeling regulation

BRAY Edward <Edward.BRAY@efsa.europa.eu>

Wed, Feb 20, 2019 at 10:49 AM

To: Athan Gadanidis <Aristoleo.com@gmail.com>

Cc: GOULAKI Olga <Olga.GOULAKI@ec.europa.eu>, RAIKOS Athanasios <Athanasios.RAIKOS@ec.europa.eu>, PADURARU Anca <Anca.PADURARU@ec.europa.eu>

Dear Athan,

We've had several exchanges over the last months. I appreciate the considerable research you have carried out into this topic and recognise the concerns you raise on behalf of olive growers. I take your concerns very seriously and I hope this e-mail will clarify in detail the points you have made.

Firstly, I stress that in its scientific opinions related to health claims EFSA is never prescriptive on the detection methods that may be used for the purposes of a health claim.

When the EFSA opinion you refer to indicates the measurement was done by 'HPLC method', it does refer to the methodology provided to substantiate the claim at the time of the submission of the dossier. Use of the term 'HPLC method' does not exclude the specific detection methods that are related such as 'HPLC-MS/MS' or 'HPLC-DAD' in this case.

It is known that HPLC is a chromatographic principle that separates compounds according to polarity – but for detection HPLC needs to be combined with for example with MS, MS/MS, UV, diode array.

Detailed information of the specific methods used for characterisation of the content of olive oil polyphenols can be found in the study by de la Torre-Carbot et al. (2010), quoted in EFSA's opinion, which indicates "HPLC-diode array detection (DAD) [...] and HPLC-tandem MS (HPLC-MS/MS) [...]". Using the methods described in the references aforementioned (also quoted in the EFSA opinion) for characterisation of the content of olive oil polyphenols should therefore be considered acceptable. It is the responsibility of the national authorities, the Greek authorities in this instance, for implementing the conditions of use and for controls on the claim. EFSA has informed the European Commission, who to our understanding, has clarified the issue with the Greek authorities in recent days. I would suggest you to follow up with the Greek authorities.

I hope this clarifies the issue. If you are not satisfied with this response, you have the possibility to open a [formal complaint](#) against EFSA.

You can submit a formal complaint by sending an email to complaints@efsa.europa.eu, providing the Authority with the following information:

- Your identity (first name, family name, contact details, employer/organization if relevant, etc.);
- The reason for your complaint
- The result you are hoping to achieve by filing a complaint; and
- Any relevant supporting documentation or references to documentation (link to websites or publications, product name, EFSA reference number, document, etc.)

Please be informed that your complaint must be brought up to EFSA within 2 years from the date on which you were informed of or have learnt about the facts on which your complaint is based on. You have also the possibility to request confidential treatment of your complaint or certain parts thereof by indicating such a requirement in the complaint itself and by providing supporting reasoning or justification.

I hope this clarifies.

Kind regards,

Edward Bray.

[Quoted text hidden]