Meeting

Final Minutes of the 3rd February 2026 COT Meeting

Minutes from the Meeting of the Committee at 11:00am, Tuesday 21st October 2025 at Broadway House and via Microsoft Teams.

Present

Chair:	Reverend Professor Lesley Stanley
Deputy Chair:	Professor Shirley Price

	Professor Gary Hutchison
	Professor Thorhallur Ingi Halldórsson
	Dr David Lovell
	Dr Cheryl Scudamore
	Dr Steven Enoch (until item 7)
	Professor Peter Barlow
	Dr Meera Cush
	Mr Gordon Burton
COT Members:	Dr Andreas Kolb
	Mr Nick Richardson
	Dr Bryony Ross Dr Michelle Bellingham
	Professor Martin Clift (from Item 4) Dr Aravindan Veiraiah
	Professor Mohammad Qasim Chaudhry
	Dr Tarek Abdelghany
	Ms Christel Wake
	Dr Antonio Peña Fernández
Scientific Advisory Committee on Nutrition (SACN) Liaison:	Dr Susan Fairweather-Tait (from Item 5)
Science Council Liaison	Professor Tom Oliver

	Ms Cath Mulholland – FSA Scientific Secretary
	Ms Claire Potter
	Mr Barry Maycock
	Dr Olivia Osborne
	Ms Sabrina Thomas
	Dr Gail Drummond
	Ms Frederique Uy
Secretariat: Food Standards Agency (FSA)	Ms Sophy Orphanos
	Dr Gaetana Spedalieri
	Dr Katie Schulz
	Ms Katie Wetherall
	Mr James Metcalfe
	Ms Polly Bevan
	Ms Abigail Smith
	Ms Alba Ureña Rusillo
	Dr Barbara Doerr
	Dr Alex Cooper
Secretariat: UK Health Security Agency (UKHSA)	Ms Britta Gadeberg
UKHSA Contractor – Bibra	Mr Daniel Threlfall
	Mr Chris Waine
Assessor: UK Health Security Agency (UKHSA)	Dr Ovnair Sepai (From item 5)
Assessors: Business, Energy and Industrial Strategy (BEIS)	Ms Frances Hill

FSA officials:	Ms Natasha Hawkins Ms Tamina Khan Mr Vincent Greenwood
Food Standards Northern Ireland (FSA NI) officials:	Ms Catherine Hardy
Food Standards Scotland (FSS) officials:	Ms Krystle Boss Mr Lorcan Browne
External Observers:	Dr Gill Clare – FCMJEG Dr Emma Bradley – FCMJEG (from item 4) Dr Helen Crawley – Director, The Lizzie Vann Foundation (Item 5 onwards)

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Announcements

1. COT Members were informed that Professor Ian Young from Queen's University Belfast has been appointed as the new FSA Chief Scientific Advisor. It was noted he had been the Chair of the Scientific Advisory Committee on Nutrition (SACN) until very recently. COT Members welcomed the appointment and looked forward to working with Professor Young.

Interests

2. The Chair reminded those attending the meeting to declare any commercial or other interests they might have in any of the agenda Items.

Item 1: Apologies for absence

3. Apologies were received from COT Members Dr Alison Yeates, Professor Philippe Wilson, Dr Simon Wilkinson and Professor Chris Morris as well as assessors Ms Minako Allan (Health and Safety Executive (HSE)), Ms Beth Glennie (HSE) and Ms Sanyukta Pallavi (UKHSA).

Item 2: Draft minutes and reserved minutes of the Tuesday 9th December 2025 meeting (TOX/MIN/2025/07)

4. The draft minutes of the meeting held on the 9th of December 2025 were reviewed. It was noted that some minor corrections had been received by email: subject to these amendments, the minutes were accepted as an accurate record.

Item 3: Matters arising

Ashwagandha

5. In response to a question from the Chair on the status of the ashwagandha statement, the Secretariat confirmed that the statement was in the process of being restructured in response to COT Members' comments and would shortly be sent for review by the Chair; it was hoped that the revised statement would be presented at the March COT meeting.

The maternal diet

6. COT Members noted that there was some ambiguity in the original wording of the minutes for item 4 which stated, "effects mediated via the mother". They discussed whether this specifically meant effects secondary to maternal toxicity or whether effects occurring via maternal exposure were also included. The original scope the FSA/COT had received from the SACN referred only to congenital abnormalities but this had been interpreted by the Committee at the time to include other adverse effects which occurred as a result of *in utero* exposure, such as neurodevelopmental effects arising from lead or mercury exposure. It was noted that, for example, the paper on cadmium in the maternal diet captured the scope as follows "…SACN agreed to conduct a risk assessment on nutrition and maternal health focusing on maternal outcomes during pregnancy, childbirth and up to 24 months after delivery; this would include the effects of chemical contaminants and excess nutrients in the diet".

7. COT Members discussed the length of time for which lactational effects should be considered, since the scope of the project was up to 24 months after delivery. Members were informed that the previous work on the infant diet

included exposure via breast milk and the Secretariat would provide COT Members with the terms of reference to see where this overlapped with the maternal diet. Members agreed that further clarity was needed on the scope of the project. The Secretariat agreed to develop a formal statement of the project scope in conjunction with SACN.

Joint Expert Group (JEG) updates

Additives, Enzymes and other Regulated Products Joint Expert Group (AEJEG)

8. The AEJEG had not met since the December 2025 COT meeting. Members were reminded that application RP733 had been discussed at the previous AEJEG meeting, following which a Request for Information (RFI) was issued to the Applicant. The Applicant's responses to the RFI will be discussed at a future AEJEG meeting.

9. The AEJEG was currently awaiting information on another application, RP1457. The Secretariat was also awaiting the return of suitability check RFIs for several other applications.

10. On February 12th, the AEJEG would meet to discuss an update paper and the latest draft of the Committee Advice Document (CAD) for application RP1765. In addition, the AEJEG would be presented with an update on the GB Food Additive Exposure Tool.

11. It was noted that the CAD for application RP507 would be approved by Chair's action when finalised.

Food Contact Materials Joint Expert Group (FCMJEG)

12. The FCMJEG considered the CAD for an application for agar palmitate (RP2263) at its meeting on the 3rd December 2025. Several issues were identified as requiring clarification prior to the finalisation of the assessment.

13. The COT was asked to note that the competent authority recycled plastics auditing activity is ongoing.

14. The CAD for RP2147 would be discussed by the COT later in the current meeting.

15. A new application had been received from HM Prison Service and was currently in the suitability check stage. It would be presented to the COT in due course.

16. The next FCMJEG meeting was planned for 25th February.

Subgroups and working groups

17. COT Members were asked to consider whether working group meetings should be held in closed or open session, noting that although such meetings were always held in closed session, this was not explicitly stated in the COT Code of Conduct. COT Members agreed that they should be held in closed session as the working groups would be discussing developing ideas that had not been discussed with the rest of the Committee, so it was not appropriate for external parties to be in attendance. However, external observers would be welcome to attend the meetings where the working groups presented their work to the main Committee as these would generally be held in open session.

18. COT Members were reminded that if they were working group Members, they should not accept invitations to speak where it concerned the specific work being carried out by that working group; if in doubt they should discuss with the Secretariat.

Per- and Polyfluoroalkyl Substances (PFAS) working group

19. The PFAS working group last met for a short update meeting following the December COT meeting. The next meeting would be held in late spring/early summer 2026.

20. COT Members were informed that the government had announced their first ever PFAS plan which could be circulated to Members.

Guidance working group

21. The next meeting of the Guidance working group was scheduled for mid-March.

Publications

22. Members were informed that the first Science and Research Special Topics report on novel formulations of supplement compounds designed to

increase oral bioavailability had been published on the COT website along with the statements on mercury, citrinin and ergot alkaloids in the maternal diet.

Item 4: RP2147 FCMJEG (Reserved) (TOX/2026/01)

23. No interests were declared.

24. Dr Gill Clare and Dr Emma Bradley from the FCM JEG were in attendance for this item

25. This item is currently being treated as reserved as it involves commercially confidential and sensitive information.

Item 5: COT Annual Report 2025 (TOX/2026/02)

26. No interests were declared.

27. Annex A of paper TOX/2026/02 contained the draft text of the COT section of the 2025 Annual Report for the Committees on Toxicity, Carcinogenicity, and Mutagenicity of Chemicals in Food, Consumer Products and the Environment.

28. COT Members were invited to comment on the report and to consider how the COT had performed during 2025 against the Good Practice Guidelines for Committees advising the FSA, as annexed to the paper.

29. COT Members considered the different aspects of the Good Practice Guidelines and agreed that, in general, the Committee had performed well against them.

30. Some minor editorial comments had been suggested ahead of the meeting and COT Members were advised to send any additional comments to the Secretariat. Subject to these amendments, COT Members were content with the draft text of the 2025 Annual Report.

31. COT Members were reminded to ensure their declarations for the Register of Interests were up to date. Any outstanding declarations or in-year changes should be sent to the Secretariat.

Update on actions taken subsequent to COT advice - Paper for information (TOX/2026/03)

32. No interests were declared.

33. Paper TOX/2026/03 provided an update on actions taken following the provision of advice by the Committee. The paper was largely provided for information, but Members were welcome to comment or ask questions. The paper should be read in conjunction with the draft 2025 Annual Report.

34. COT Members considered the paper provided a useful summary of follow up actions and recent Committee activities.

35. It was suggested that the paper could be circulated more widely, beyond the Committee itself, as it provided a useful overview of the work undertaken. The Secretariat noted that it would be published on the COT website.

36. A few minor amendments were suggested. It was also noted that there was an error in the update on cannabidiol (CBD); this stated that the ANSES report on CBD was conducted under REACH, but it was actually an application under the classification, labelling and packaging of substances and mixtures regulation (CLP Regulation (EC) No 1272/2008). Both are managed by the European Chemical Agency (ECHA), but they are separate regulations.

37. Clarification was requested regarding the description of Joint Expert Groups (JEGs) within the section on Committee activities: it should be clear why the JEGs were established and how they differed from parent Committees. It should also be clear on the circumstances under which additional working groups might be convened. It was noted that information was available in existing annexes to the Annual Report (Annex 2- Code of Conduct and Annex 4 Good Practice Agreement) though some updating may be necessary. Additional signposting to the information already available on the main website was recommended. It was noted that while information was currently available on the COT website this was likely to be revised during the transition to the new website.

Item 6: Potential future discussion items – horizon scanning (TOX/2026/04)

38. No interests were declared.

39. A number of suggestions for future discussions items were received ahead of the meeting and included in the discussion as appropriate.

40. Paper TOX/2026/04 set out the potential future topics for consideration by the Committee. COT Members were asked to comment on these and suggest any other ideas for papers, working groups or the annual workshop. COT Members also received a verbal update on upcoming items not listed in the paper, potentially including irritant sprays.

41. One possible topic for consideration was that of nanoplastics and in particular whether these could be considered as a separate topic or not. COT Members noted that it would be difficult to separate microplastics and nanoplastics in practice, as a realistic exposure scenario was likely to involve both. Microplastics tended to dominate the available evidence base, and it was also noted that nanoplastics did not necessarily behave like engineered nanomaterials. Members indicated that micro and nanoplastics might therefore need to be considered together.

42. The COT had previously assessed microplastics, including by both the oral and inhalation routes. COT Members considered whether sufficient new evidence had emerged since the last review to justify a new one and noted that there was a lot of ongoing cross-government and international work in this area. COT Members agreed that they should avoid undertaking broad reviews which were already being undertaken elsewhere, and that there would be more value in identifying gaps that were in the Committee’s remit and focusing on those.

43. COT Members discussed the potential migration of micro and nanoplastics from different matrices and in particular food contact materials (FCMs.) This could include particle-to-chemical effects such as leachates, physico-chemical processes, and the implications for consumer exposure. Recent EFSA technical work on micro- and nanoplastics release from FCMs was noted. However, COT Members highlighted that the key point identified was that the evidence base was largely microplastics, with limited information on nanoplastics being available.

44. Methodological difficulties relating to defining health-based thresholds and balancing precise experimental data with imprecise exposure estimates were highlighted by COT Members.

45. The Committee suggested that a scoping paper on nanoplastics, possibly in the context of FCMs, could be beneficial to assess whether sufficient

evidence existed for a standalone review. Potential future COT contributions could relate to alternatives to single-use plastics and the safety of novel packaging materials. Members suggested alternatives to single-use plastics to be included within the proposed scoping paper. COT Members were reminded that they had assessed such alternatives including bamboo- and chitin-based products as alternatives to single-use plastics.

46. COT Members then discussed hazard- versus risk-based approaches to chemical risk assessment and the potential unintended consequences of overly conservative hazard-based approaches. It was suggested that a joint working group could be set up with the Science Council to produce a short report on risk and hazard-based approaches and how the United Kingdom considered these concepts in the context of chemical risk assessment.

47. COT Members then discussed upcoming regulatory considerations relating to carcinogenic, mutagenic, and reprotoxic (CMR) chemicals, particularly in the context of anticipated alignment with EU developments. COT Members received a brief update on work relating to new hazard classes under CLP Legislation and updated testing guidance including for mixtures.

48. Emerging topics identified by COT Members included alternative proteins and their associated allergenic risks, as well as climate-driven contaminants such as aflatoxins and algal toxins. It was considered that workshops may be more appropriate than formal papers for these topics. However, it was noted that the Advisory Committee on Novels Foods and Processes (ACNFP) had held a workshop on novel proteins and allergenicity risk. The importance of avoiding duplication and identifying any gaps where the Committee could add value was emphasised. COT Members noted that anti-nutritional factors, which were considered hazards associated with some plant-based proteins, were of potential concern. It was agreed that liaison with the ACNFP Secretariat would be appropriate regarding anti-nutritional factors.

49. COT Members discussed alternatives to PFAS across various applications noting the challenges in defining substitutes, assessing their toxicity and determining regulatory responsibility.

50. The public interest in ultra-processed foods (UPFs) was noted. COT Members discussed the potential interactions between UPFs, food packaging materials and chemical mixtures. Members emphasised the importance of keeping up to date with activities across committees and a cross-committee workshop was proposed as a potential future activity.

51. It was suggested that horizon scanning could be done as a regular agenda item as was done by the Committee on Carcinogenicity. COT Members agreed to trial this proposal.

Item 7: Scoping paper on the potential risks of chemicals (other than caffeine) found in green and black tea in the maternal diet (TOX/2026/05)

52. Dr Meera Cush declared an historic interest as in 2002 she undertook an academic study on black tea and urinary excretion of mutagenic compounds. This was not considered to be a conflict and Dr Cush was able to contribute to the discussion. No other interests were declared.

53. Paper TOX/2026/05 was part of the ongoing work for SACN and their review of the maternal diet. It was noted that, unlike previous maternal diet papers, the review had adopted a broad scoping approach, listing and preliminarily discussing chemical compounds that could occur in tea; caffeine would be addressed separately and therefore was excluded from the present discussions.

54. Tea products must comply with General Food Law prior to being placed on the market. Members requested that any regulatory limits for contaminants to be included in the relevant section(s) where applicable.

55. COT Members considered that “women of childbearing age” as stated in the scoping paper, did not provide enough clarity on the specific population of interest; this would be women during the preconception stage and up to 24 months postpartum.

56. COT Members discussed whether white tea should be included in the review, as it was derived from the same plant species (*Camellia sinensis*) and was marketed as a minimally processed product that could be consumed in moderation during pregnancy. As there was flexibility to adjust the list of substances to be considered in agreement with SACN, COT Members requested it be included in subsequent work.

It was further agreed that decaffeinated tea should also be assessed due to differences in manufacturing process compared to conventional tea, including the

possible use of solvents. It was noted that current guidance from resources like the National Health Service does not offer guidance on the safety of decaffeinated tea during pregnancy.

57. COT Members acknowledged the complexity of the assessment due to the multicomponent nature of tea, discussing the sources of uncertainty and variability that would need to be considered in both the exposure and risk assessments. For example, these could include consumer preferences in tea preparation (steeping time, addition of milk, sugar and honey, water temperature, loose vs. bagged), differences in contamination levels present due to regional variation (i.e. where the tea was grown) and manufacturing processes.

58. The approach of the literature review was discussed. It was concluded that, as a first step, the focus should be to identify the potential adverse effects of tea (black, green, white, decaffeinated and caffeinated), and then to link these to the compound(s) potentially present in tea. Caffeine related effects would be excluded as they would be considered separately.

59. Prioritisation of the chemical compounds reported to cause adverse effects should be based on whether exposure from tea causes elevated levels compared to background exposures and/or other food sources. It was agreed that fluoride, polyphenols and manganese should be further investigated. However, it was noted that fluoride more generally would be reviewed by the Committee in the near future

60. COT Members agreed that the review of tea should be postponed until they have completed their review of caffeine in the maternal diet, and of fluoride.

Item 8: Update on the work of other FSA Scientific Advisory Committees - for information (TOX/2026/06)

61. The paper was for information but Members were advised that they could send any questions to the Secretariat.

Item 9: Any other business

62. There was no other business

Date of next meeting

63. The next meeting of the Committee will be at 10:00 on Tuesday 31st March 2026 at Foss House, York and via Microsoft Teams.

Secretariat

February 2026