

TOX/2026/03

Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment

Update on actions taken subsequent to COT advice – Paper for information

Background

1. This paper contains brief information on other actions taken subsequent to completion of recent COT discussions. This should be read in conjunction with the draft text of the Annual Report (paper TOX/2026/02), which provides the background.

COT Evaluations

2. During 2025, COT statements have been published on ginger, mercury and citrinin in the maternal diet. These have been shared with Scientific Advisory Committee on Nutrition (SACN) colleagues. The outcomes of earlier reviews have been incorporated into their position statement on the maternal diet which is due to be published later this year. The nutrition and maternal weight outcomes report is the first of 2 publications on SACN's assessment of nutrition and maternal health. This report considers SACN's assessment of nutrition and maternal weight outcomes. A further position statement will consider wider UK dietary recommendations for women of childbearing age. This will include details of the COT statements describing COT's assessments, findings and associated advice.

3. A statement of advice on the risk to human health from consumption of bivalve molluscs (shellfish) harvested from UK waters associated with marine biotoxins was also published. This has been provided to policy colleagues to support their work in this area.

4. COT opinions are frequently cited by the relevant Government Departments and Agencies in dealing with correspondence.

5. The Food Standards Agency (FSA) and UK Health Security Agency (UKHSA) routinely uses the Committee's conclusions and opinions in risk assessments following food safety incidents, drinking water exceedances, responding to queries from consumers or members of the public and in assessing emerging risks. For instance, COT advice was used by the FSA in an incident involving high levels of bisphenol A (BPA) in piping tips for buttercream decoration. The tolerable daily intake (TDI) of 0.2 µg BPA/kg bw/day set by the German Federal Institute for Risk Assessment (BfR) and adopted by COT in 2024 was used to conduct the risk assessment.

Other Committee activities

Regulated Products

6. The Committee has commented on number of AEJEG and FCM JEG opinions on various regulated products.

7. The FSA are now using the Scholastica publication tool for the [Journal of Food Standards](#) to publish all FSA science reports. In 2025, RP1702 (Calcium tert-butylphosphonate used as an additive for use in the manufacture of plastic food contact materials and articles) and RP1245 (Modification of Specifications of Rebaudioside D (E960c) to Include Manufacture by Enzymatic Conversion) were published. Several applications are being held at the publication stage given applicant interest or completion of final comments, due to be published in March or in the first quarter of the new financial year; these include RP507 (blue microalgae as a food additive), RP41 (extension of use of curcumin), and 3 smoke flavouring assessments.

COT workshop

8. The COT held a workshop in October 2025 in London, United Kingdom on “Exploring AI in Chemical Risk Assessment”. The workshop set out to explore the complex readiness of the data ecosystem and state of the art AI technologies. Opportunities as well as challenges associated with application of AI in chemical safety assessment were reviewed and discussed.
9. The workshop report will be published in due course.
10. The report of the 2024 COT workshop - Gut Reactions: xenobiotics and the microbiome was published.

Working Groups and Subgroups

Joint SACN-COT Working Group on plant-based drinks

11. The COT statements from 2021 fed into the work of the joint COT – SACN WG on plant-based drinks. The WG undertook a BRAFO analysis of almond, oat and soya drinks compared to cows’ milk. The final report was published in 2025 with a largely positive reception.
12. The report made recommendations to government and industry. The Department of Health and Social Care is considering the recommendations made in the SACN/COT report carefully. Updated advice for consumers will be provided on NHS.uk
13. The government considered the report’s findings, alongside consultation responses and a range of evidence, to inform the decision to include plant-based and milk-substitute drinks in the Soft Drinks Industry Levy.

Cannabidiol (CBD)

14. The joint COT/ Advisory Committee on Novel Foods and Processes (ACNFP) on cannabidiol (CBD) and hemp-based foods continues to support FSA activity on

these products. In 2025 they published a position paper on establishing a Safe Upper Limit for delta-9-tetrahydrocannabinol (Δ 9-THC) and its precursor as contaminants of hemp-derived products including CBD novel food along with a statement on the conclusion of a review of a proposal under “REACH” by the French Agency (ANSES) to classify CBD through all exposure routes. This work continues to support the FSA in its approach to these products.

BTS and publications

15. Posters presenting the COT’s work on ginger in the maternal diet and marine biotoxins were presented at the BTS Annual Congress in April 2025. Posters on Ocean-Bound Plastic and ashwagandha were presented at the 2025 Annual Eurotox congress

Publications

16. The report by RSM UK Consulting LLP on the Safety of Nitrates and Nitrites as Food Additives was published in Autumn 2025; COT Members provided peer review and general comments on the report. While there was some criticism from campaigners concerned about nitrate use, the report forms part of the package of evidence used by the FSA to inform its position on nitrates.

17. The COT held a workshop “Gut reactions: xenobiotics and the microbiome” in October 2024.

18. The workshop set out to explore the complex current state of the science of the microbiome pathophysiology and the possible impact of xenobiotics on host microbiome interactions and vice versa, including possible mechanisms and health implications, with a particular emphasis on the gut microbiome and dietary exposure.

19. In addition, the aim was to enable new insights, review the science, initiate discussions to determine where the data gaps are in research, what effects are of concern, and how might xenobiotics be evaluated practically for such effects in the future.

20. The workshop report is now available [online](#) and [PDF](#).

(DOI : <https://doi.org/10.46756/sci.fsa.hew928>)

21. The workshop report was presented to the Advisory Committee on the Microbiological Safety of Food ([ACMSF Plenary Meeting](#)) and was featured in the Brand Reputation Compliance Global Standards [BRCGS newsletter](#).

EFSA and other public consultations

22. In 2025, the COT submitted comments to the following EFSA public consultations:

- The EFSA Panel on Food Additive and Flavourings (FAF) 'Draft guidance on the preparation of an application for authorisation of a food additive submitted under 4 Regulation (EC) No 1331/2008'.
- EFSA Draft Guidance for Public Consultation: Draft guidance document on the submission of data for the evaluation of the safety and efficacy of substances for the removal of microbial surface contamination of foods of animal origin intended for human consumption.
- The EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA) draft Evaluation of the safety of preparations from the fruits of sweet and bitter fennel.
- The EFSA Contaminants in the Food Chain (CONTAM) draft opinion on the Risks to human health from lectins in food.
- The EFSA CONTAM panel draft opinion on Δ^8 THC – Derivation of a Health Based Guidance Value.
- The EFSA CONTAM panel draft opinion on its draft scientific opinion on the update of the risk assessment of dioxins and dioxin-like PCBs in feed and food.

Questions for the Committee

23. This paper is largely for information, but Members are welcome to ask any questions.

Secretariat

January 2026