



Association of Manufacturers and Formulators of Enzyme Products

Amfep/04/20

Brussels, 4 June 2004

Mr. Jacques HUMIERES  
European Commission  
DG SANCO  
Directorate D4: Food law and Biotechnology  
Office F101 08/78  
Rue de la Loi 200  
B - 1049 Brussels CCE

Dear Jacques Humières,

Amfep (The Association of Manufacturers and Formulators of Enzyme Products) was represented by Mr. Peter Hvass of Novozymes at the EFSA stakeholder hearing on technological aspects of allergen derivatives, June 2<sup>nd</sup>.

At the meeting, Mr. Hvass raised the question whether enzyme products obtained from fermentation and used as processing aids are actually within the scope of Directive 2003/89/EC, and it was his understanding that you expressed the opinion that these products are outside the scope of this directive.

The reason for this view is based on the following:

- Enzymes used as processing aids are not subject to labeling requirements on the final food
- Enzyme products obtained from fermentation are not directly derived from ingredients listed in Annex IIIa; they are derived from micro-organisms fed on ingredients listed in Annex IIIa

AMFEP would be grateful to get the Commission's confirmation that enzyme products are indeed outside the scope of Directive 2003/89/EC.

Truly yours,

A handwritten signature in blue ink, appearing to read "K. De Neve", is written over a horizontal line.

Karolien De Neve