



# Regional Think Tank on Innovation-Ready Food Regulatory Systems in Asia

**Prof. Samuel Godefroy**

Professor, Food Risk Analysis and Regulatory Policies,  
Laval University, Quebec, Canada; President GFORSS;  
President IUFoST

Setting the Stage

# SETTING THE STAGE: OBJECTIVES

- Introduce the scope, ambition, and boundaries of the initiative
- Clarify what problem we are solving—and what we are not
- Frame the expected outcomes of the two-day Think Tank
- Position the work within CCASIA23 follow-up and broader regional efforts

# FRAMING THE ISSUE: A RAPIDLY EVOLVING INNOVATION SPACE

- ❑ Asia is at the forefront of transforming traditional ingredients into modern food applications
- ❑ Increasing integration of bioactive substances into food products positioned for health and wellness
- ❑ This evolution is outpacing regulatory frameworks, creating:
  - Divergent definitions of novelty
  - Inconsistent safety and claims requirements
  - Fragmented market access pathways

# DEFINING THE SCOPE: WHAT WE MEAN BY “FUNCTIONAL INGREDIENTS”

## Core clarification of scope

Focus on ingredients that are added or supplemented to food – including ingredients originating from traditional diets (e.g., TCM, TTM etc. )

The food product is the primary vehicle for delivering the “functional ingredient” and the claimed benefit

Functionality is acquired through addition, not intrinsic

## Explicit inclusions

Bioactive compounds, extracts, and preparations

Ingredients derived from traditional medicine systems, used in food formats

Substances introduced to deliver specific physiological or health-related effects through food

## Explicit exclusions

Foods that are inherently functional by nature

Examples: fruits, such as bananas, staple foods, naturally nutrient-rich foods

Products where functionality is not the result of deliberate addition

# CLARIFYING THE SCOPE OF CLAIMS

- Focus on non-nutrient function claims
- Claims related to physiological or health effects beyond basic nutrition
- Exclusion of:
  - Nutrient content claims (e.g. “high in vitamin C”)
  - Traditional nutrition labeling domains

## Key Challenge

*Scientific substantiation of these claims is heterogeneous across jurisdictions*  
*Leads to inconsistent acceptance and regulatory decisions*

# THE CORE PROBLEM WE ARE ADDRESSING

- ❑ Same ingredient → different pace of market access / regulatory approval – including possible divergence in regulatory outcomes across countries of Asia
- ❑ Same claim → accepted in some jurisdictions, rejected in others
- ❑ Limited access to existing scientific assessments
- ❑ Duplication of effort across regulatory systems

## Result

*Reduced predictability for innovators*

*Increased burden on regulators*

*Slower access to safe innovation*

# STRATEGIC FRAMING: NOT HARMONIZATION, BUT CONVERGENCE

- ❑ The initiative is not (necessarily) about full regulatory harmonization
- ❑ It is about:
  - Convergence of approaches
  - Alignment of scientific methodologies
  - Facilitating mutual confidence and reliance



**This reflects the direction highlighted under CCASIA23 discussions**

# DEFINING THE SCOPE: WHAT WE MEAN BY “FUNCTIONAL INGREDIENTS”

## Core clarification of scope

Focus on ingredients that are added or supplemented to food – including ingredients originating from traditional diets (e.g., TCM, TTM etc. )

The food product is the primary vehicle for delivering the “functional ingredient” and the claimed benefit

Functionality is acquired through addition, not intrinsic

## Explicit inclusions

Bioactive compounds, extracts, and preparations

Ingredients derived from traditional medicine systems, used in food formats

Substances introduced to deliver specific physiological or health-related effects through food

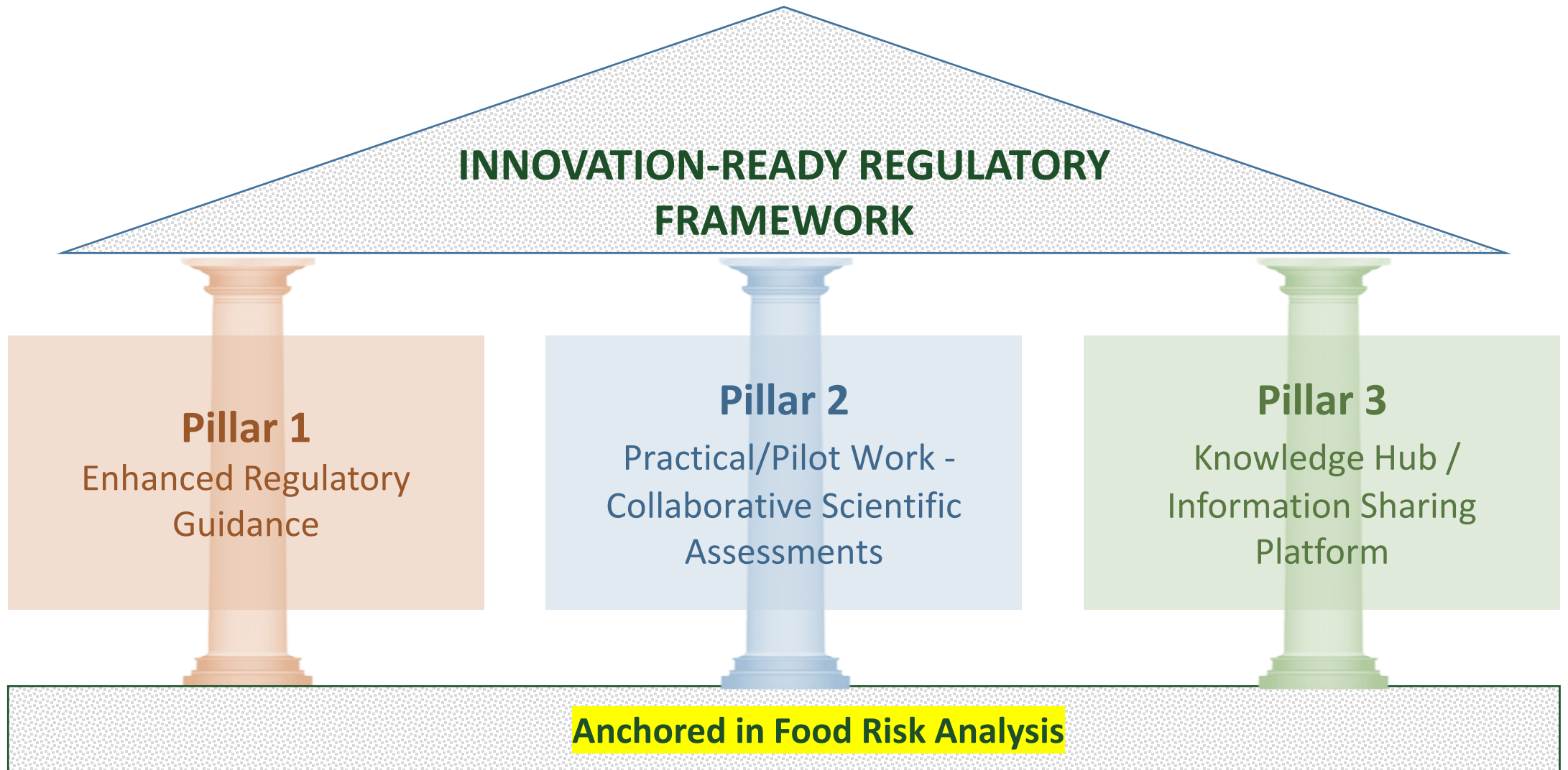
## Explicit exclusions

Foods that are inherently functional by nature

Examples: fruits, such as bananas, staple foods, naturally nutrient-rich foods

Products where functionality is not the result of deliberate addition

# THE THREE PILLARS OF THE PROPOSED INITIATIVE



# PILLAR 1

## ENHANCED REGULATORY GUIDANCE

### OBJECTIVE

Create a more predictable and transparent regulatory environment

### Approach

- ❑ Develop Codex-consistent, regionally relevant guidance on:
  - Novelty triggers
  - Safety assessment requirements
  - Claims substantiation principles

## PILLAR 2

# PRACTICAL/PILOT WORK - COLLABORATIVE SCIENTIFIC ASSESSMENT

## OBJECTIVE

Generate real-world evidence and methodologies

## Approach

- ❑ Leverage existing evaluations and test joint or sequential review models by:
  - Conducting practical, pilot assessments for:
    - Ingredients approved in some jurisdictions but not others
    - Claims with fragmented acceptance

## PILLAR 3

# KNOWLEDGE HUB / INFORMATION SHARING PLATFORM

## OBJECTIVE

Improve transparency, accessibility, and reuse of evidence

## Approach

- Provide access to:
  - Safety evaluations
  - Claims substantiation reviews
  - Regulatory decisions



# KEY ENABLERS

## Build on Existing Regional Experience

□ The initiative does not start from zero - Builds on innovative regional models, notably:

- Thailand's Food Innovation Regulation Network (FIRN)
- Multi-stakeholder collaboration
- Science–regulation–industry interface

*Scale and regionalize FIRN model and similar approaches across Asia*

# RELATIONSHIP WITH CODEX AND CCASIA

- ❑ Project Anchored in Codex principles (science-based, risk analysis, transparency)
- ❑ Builds on CRD14 introduced by China and IUFoST at CCASIA23
- ❑ Important clarification:
  - Codex is not the sole or immediate endpoint
- ❑ Regional work can:
  - Generate practical outputs first
  - Feed into future Codex discussions when mature and if deemed useful

# WHAT THIS MEETING MUST ACHIEVE (TWO-DAY FOCUS)

## Day 1 Scoping and Prioritization

- Define and validate:
  - Scope of ingredients and claims
  - Priority substances and claims
- Identify:
  - Key regulatory barriers
  - Opportunities for convergence

## Day 2 Structuring the Workplan

- Translate discussions into:
  - 3-pillar framework
  - Governance structure
  - Operational modalities
- Agree on:
  - Priority pilot activities
  - Roles and participation

## Outputs What the Think Tank will accomplish:

- Refined scope of the initiative
- Prioritized list of ingredients and claims for pilot work
- Initial agreement on three-pillar approach
- Outline of governance and coordination mechanisms
- Contribution to a 2 year workplan

# CONCLUSION

**This initiative represents a pragmatic, science-driven response to a fast-evolving innovation space aiming to:**

- ✓ Enable safe innovation
- ✓ Reduce fragmentation
- ✓ Strengthen regulatory confidence across Asia



## **Key success factors:**

- Moving from discussion → structured collaboration → practical outputs
- Mobilization of the Food Science and Technology Community as the leading Catalyst for Implementation
- Broad Engagement with Regulators of the Region and their Buy in, into the initiative as a strategic objective, supporting national and regional food innovation agendas.

