



EHPM Annual Report 2020

General Assembly
25th February 2021



European Federation of Associations
of Health Product Manufacturers



Who are we?

EHPM was created in 1975 and represents approximately 1600 health-product manufacturers in 14 European countries. Through our member associations we aim to provide consumers with safe, science-based, high quality products as well as accurate and helpful information about their nutritional value and use.

EHPM’s focus is very much on securing a workable regulatory structure for these companies. EHPM is also a member of SMEUnited (the European Association of Craft, Small, and Medium-Sized Enterprises), the European SME Umbrella organisation. SMEUnited incorporates around 70 member organisations from over 30 countries.

In order to have a global overview of the food supplement sector, EHPM is also member of IADSA the International Alliance of Dietary/Food Supplements Associations.

EHPM cooperates actively with the European Commission, the European Parliament, national governments, relevant trade associations and consumer groups, leading scientists, and international contacts to reach consensus.

OUR MISSION

- Represent the interests of specialist health product manufacturers and distributors in Europe.
- Work towards developing an appropriate regulatory framework throughout the EU for its members’ products.
- Promote industry best practices for product quality and safety.

WHAT WE BELIEVE IN

- Legislation on the levels of food supplement ingredients should be based on safety data obtained from nutrient appropriate scientific evaluation, to ensure the optimum health of consumers.
- Manufacturers should be able to respond to developments in nutrition science. Innovation must be encouraged to provide consumers with safe food supplements which meet their varied needs.
- Legislation must permit products to be accompanied by appropriate labelling information to educate consumers. Such measures will, in turn, improve the general health of the population and decrease the risk of some major diseases.



“Appropriate EU legislation for food supplements must be developed to prevent barriers to trade and ensure consumer choice”

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“I am thankful for the high expertise provided by EHPM’s members in the working groups and task forces that allows EHPM to develop concrete proposals and to implement its proactive approach.

This year, EHPM managed to position itself as the voice of the food supplement sector as it was the only Association that exposed itself on a number of dossiers giving voice to the instances of the entire sector. EHPM managed to build an important network within the European Institutions and with stakeholders.

For 2021, EHPM is committed to strengthen its proactive approach and develop a closer relationship with academia and scientific representatives as well as with consumers’ associations. This is essential to frame a fair regulatory environment for food supplements.”

- Livia Menichetti,
EHPM Director General

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EHPM’s main activities of 2020 in a nutshell

01

In line with our proactive approach, we made our voice heard with two influential publications:

- A manifesto for the food supplement sector in Europe containing EHPM’s priorities for the coming years as well as concrete proposals to address the main regulatory challenges.
- An EHPM proposal for a Graded Approach to the Assessment of Botanical Health Claims detailing a concrete solution to the challenges represented by the Health Claims Regulation.

02

We successfully engaged with the EU institutions (European Commission, European Parliament) on a number of dossiers crucial to the food supplement sector.

03

In the context of the COVID-19 pandemic, we nonetheless managed to organise multiple events that had representatives of the EU institutions as active participants (i.e. speakers) and activate industry representatives through our working groups and task forces (Red Yeast Rice & HADs) to discuss and address urgent regulatory developments.

04

We grew as an association welcoming four new affiliate members.



“Never in the history of the Food Supplements has so much been done for so many by so few...

Much, many, few, three words I ‘d like to link to the way our Industry is supported by the work of EHPM.

So much: If the EHPM wouldn’t exist, nobody would do the job the way it is done and get the impressive results (image, network, information, influence) recognized by lawmakers and EC servants.

So many: Each of the 10.000 food supplement operators in the EU, small or large, contributing or not to a national association, benefits from the EHPM actions.

So few: Our Director General Livia Menichetti can count on the support of the Working groups and a dynamic Board. While strongly committed and very efficient, EHPM is a small team which achieves things other much larger organisations can only dream of!

Let’s be proud of it!”

- Michel Horn, EHPM Chair

The Impact of the Covid-19 Pandemic

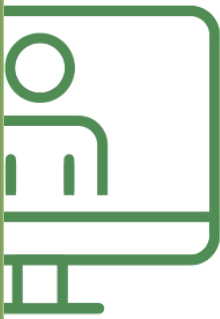
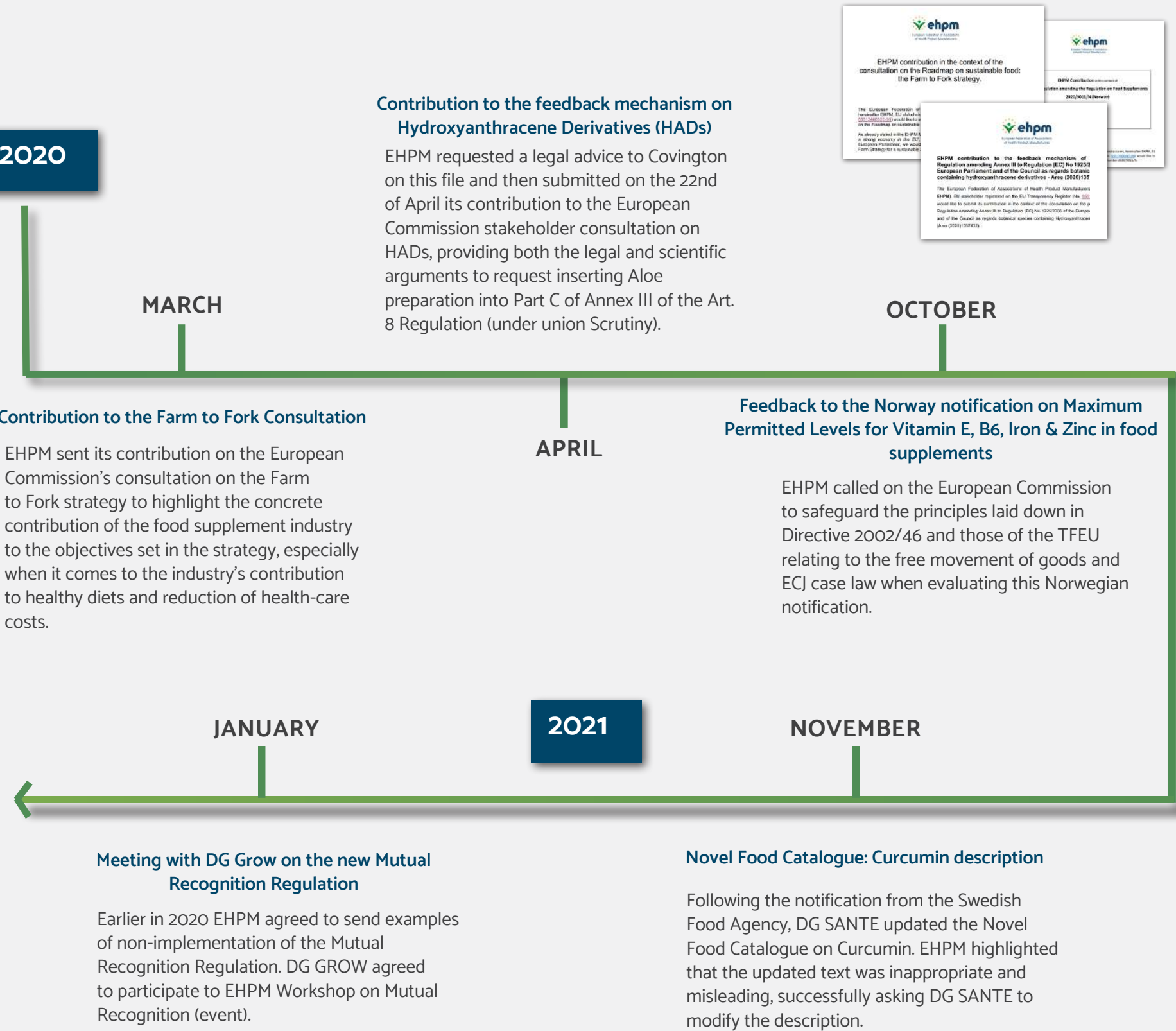
2020 was a turbulent year marked by the COVID-19 pandemic, which saw EHPM – like much of the rest of the world - switch to teleworking and adapt to the new ways of working from home. As of March, all our events and meetings were also brought online. That being, we continued to work around the clock to represent and defend the interests of the food supplement sector.

One of our most important achievements in 2020 came on March 23rd. On this date, EHPM sent a formal letter to the European Commission, requesting to “Stop the Clock” for the consultation on the draft regulatory proposal on Hydroxyanthracene Derivatives (HADs) and on other consultation involving stakeholders. The letter was sent in in cooperation with SMEUnited and led to the decision by the European Commission to extend the HADs consultation deadline for feedback by three weeks.



Engagement with European Institutions

Over the course of 2020, EHPM has proactively engaged on a series of dossiers discussed amongst EU institutions to ensure the voice of the food supplement industry was heard and taken into consideration. Key topics included the new Mutual Recognition Regulation, the Farm to Fork strategy, Art.8 of Regulation 1925/2006: hydroxyanthracene derivatives (HADs), maximum levels of vitamins and minerals, and the description of curcumin in the EU Novel Food Catalogue.



6 Online Meetings with MEPs on HADs (Aloe) File



3 Official Meetings with DG SANTE

- Meeting with DG SANTE Unit E1 with Director General, Sabine Juelicher, to present the FS sector and main regulatory challenges in May 2020.
- Several calls with Unit E1 Yvette Azzopardi on Art.8 of Reg. 1925/2006.
- Meeting with Unit E1 Head of Unit Sabine Pelsser in cooperation with BDIH and NPN on legal and procedural flows of Art. 8 of Reg. 1925/2006.



• **Participation in the EFSA online Stakeholder forum**

• **Engagement with other Stakeholders**

IPA EU/ International, EHIA, Cosmetics Europe, Spirits Europe, Food Drink Europe, Safe advocacy Europe.

• **Engagement with key Opinion Leaders**

Prof. Pirro. Prof Demeyer.

EHPM Working Groups’ Main Achievements



Martin Last (HFMA)
Chairman

Regulatory and Quality Working Group

The Regulatory & Quality Working Group met four times in 2020, under the chairmanship of Martin Last (HFMA), with Penny Viner (HFMA) as Vice Chair. Meetings were regularly attended by approximately 12 participants from Member Associations and Member Companies. The EHPM Regulatory & Quality Group’s goal is to address the numerous regulatory and technical challenges facing our industry. To ensure EHPM covers current and potential issues affecting our members, the Group receives input from the Board and Members when establishing its agenda.

The main achievements of the Regulatory & Quality Working Group in 2020 were:

- Arranging the systematic review of the EHPM model of Maximum Levels for Vitamins & Minerals.
- Generating technical input to address some of the issues created by EFSA’s implementation of its recent review of Additives, particularly on Silicon Dioxide and Potassium Sorbate.
- Providing feedback to the Commission on the REFIT process of The Nutrition and Health Claims Regulation.
- Providing input for the non-botanical section of the EHPM Quality Guide.
- Providing input to the activity with Hydroxyanthracene derivatives (HADs) and the impact of the Article 8 procedure on matters regarding Aloes, Red Yeast Rice, Alpha Lipoic Acid, Garcinia Cambogia and other nutrients impacted by this procedure.

For 2021, the Working Group’s plan is to focus on the below:

- Finalising the systematic review of the EHPM model of Maximum Levels for Vitamins & Minerals.
- Finalising the upgrade of the non-botanical section of the EHPM Quality Guide.



Penny Viner (HFMA)
Vice-Chair

Botanicals Working Group

The Botanicals Working Group met four times in 2020, under the chairmanship of Jonathan Griffith (IHTA), with Penny Viner (HFMA) as Vice Chair. Meetings were regularly attended by approximately 16 participants from Member Associations and Member Companies.

The EHPM Botanicals Working Group’s goal is to produce EHPM’s input into the EU policy development process such as the EHPM Proposal for a Graded approach to the assessment of botanical health claims as well as to produce self-regulating guidelines for the industry specifically on botanicals such as the Botanicals Safety Paper.

The following were the main achievements from the Botanicals Working Group in 2020:

- Finalising the paper on EHPM proposal for a Graded Approach to the Assessment Botanical Health Claims on Foods and Food Supplements in the EU and its Briefing Paper.
- Arranging for the official online launch of the paper which engaged more than 300 attendees from European and national institutions, authorities, associations, and companies.
- Significant progress has been made in the upgrade of the EHPM Quality Guide with regards to Botanicals. An initial draft was produced, but the aspiration to have a finalised draft ready for the end of the year was put on hold because of Covid-19 complications.

For 2021, the Working Group’s plan is to focus on the below:

- Supporting the Secretariat in the promotion of the paper on EHPM proposal for a Graded Approach to the Assessment Botanical Health Claims at national and EU level.
- Finalising the upgrade of the EHPM Quality Guide with regards to Botanicals in Q1.
- Finalising the Botanicals Safety Paper. However, no deadline has been set for this because of the demands placed on participants managing COVID-19.



Jonathan Griffith (IHTA)
Chairman



Penny Viner (HFMA)
Vice-Chair

Creation of a new Working Group on Probiotics

In addition to these two above Working Groups, in July 2020, EHPM created a new Work Group dedicated to Probiotics. The Working Group is chaired by Gabrielle Ventura (Synadiet) with Valerie Vercammen (Be-Sup) as Vice-Chair and its kick-off meeting was held on July 27th, 2020. Its creation followed the ICSP’s (the International Committee for the Systematics of Prokaryotes) approval of the reclassification of the genus Lactobacillus in homogenous categories, keeping the genus Lactobacillus and assigning 23 new genera and thus, defining a new taxonomy. EHPM responded with a communication promoting a petition to be shared with the European institutions as well as the competent authorities at national level asking them to agree on a suitable transition period for companies to adapt their label.

The overall objective of the EHPM Working Group on Probiotics is to update EHPM’s position on probiotics and to address the regulatory challenges regarding probiotics. Specifically, the possibility to use the term “probiotics” across the EU.



Gabrielle Ventura
Chair



Valerie Vercammen
Vice-Chair



EHPM Task Forces

EHPM TASKFORCE ON RED-YEAST RICE

The taskforce met 5 times via online meetings with interested members and companies. The objective is to prepare the EHPM Manifesto on Nutrivigilance that will be published in 2021.

EHPM TASKFORCE ON HADS

The taskforce met 4 times via online meetings with interested members and companies. The objective was to prepare and launch the EHPM communication and advocacy campaign in defence of HADs that was launched in January 2021.





EHPM's Members

EHPM started 2020 with 14 National Associations from 14 European Countries as Full Members and with 3 companies as Affiliate Members. We are proud of the many requests for information and expressions of interest our membership received over the course of 2020. As a result of our increased visibility and reputation as the voice of the food supplement sector, EHPM is growing and we were happy to see so many new joiners in 2020.

Belgium	BE-SUP
Bulgaria	AMFSB
France	SYNADIET
Germany	BDIH
Greece	SESDI
Hungary	MEKISZ/HUDSA
Ireland	IHTA
Italy	FEDERSALUS
Lithuania	MPGA/FSMA
(the) Netherlands	NPN
Poland	KRSiO
Portugal	APARD
Romania	OIPMA
(the) United Kingdom	HFMA



Welcome to our new members!

In 2020, 2 new affiliate members joined EHPM, alongside Aboca, Lallemand Health Solutions, and NSF:

1. Forever Direct EU
2. MSJ Group



In 2021, we are happy to already count 2 new affiliate members to join EHPM:

1. Nestlé Nutrition SBU
2. Biofarma



We welcome them and look forward to a great collaboration!

EHPM's Collaborations

Collaboration with Food Law Consult

Throughout 2020, EHPM continued its partnership with Food Law Consult (FLC). FLC assisted EHPM with technical and legal advices to strengthen its contributions to public consultations and to provide members with accurate, up to date information. FLC prepared the assessment report of Garcinia cambogia that was shared with the EHPM Botanicals Working Group. Most recently, FLC provided EHPM with a detailed analysis of the Brexit agreement reached in December between the UK and the EU, and the impact on food supplements. The documents were shared with Members via email and are available in the Member Area of EHPM’s new website. FLC also contributed to the revision of the EHPM contribution to the Feedback Mechanism on HADs.



Joris Geelen
Managing Director

Collaboration with Covington & Burling LLP

EHPM continued its partnership with Covington which assisted EHPM with the preparation of the EHPM Contribution to the feedback mechanism. In this context, Covington drafted a detailed legal opinion on the HADs dossier.

Events

As we kick-started the year with a high-level event at the European Parliament in February, 2020 saw us take many of our remaining events online due to the COVID-19 pandemic.

EHPM Event in the European Parliament

On February 18th, EHPM organised an event in the European Parliament to launch the EHPM Manifesto for the food supplement sector in Europe: "Food supplements for healthier citizens & a stronger economy in the EU". We had the opportunity to partner with MEP Simona Bonafè (S&D, Italy) and MEP Pascal Arimont (EPP, Belgium) that gave a keynote speech, followed by opening remarks by EHPM's Chair Michel Horn.

Two panel discussions followed:

- Panel 1 discussed the role of food supplements in health promotion and disease prevention. The topic was lively discussed by representatives from EFSA, SAFE Food Advocacy Europe and Synadiet
- Panel 2 focused on the opportunities and challenges for the food supplement industry in the context of a new EU political term. We had the opportunity to hear from representatives of the European Commission's DG Sante, SMEUnited and ABOCA

The panels were moderated by EURACTIV journalists Natasha Foote and Gerardo Fortuna respectively, and followed concluding remarks by EHPM's Director General Livia Menichetti.



EHPM Workshop on Mutual Recognition

On October 19th, EHPM hosted an online workshop on mutual recognition of goods in the EU. The workshop featured speakers from the European Commission's DG GROW, the legal consultancy Say Legal and manufacturer ISOPLUS. The following topics were discussed:

- Mutual Recognition in the EU – utopia or powerful instrument?
- The new Mutual Recognition Regulation: preparatory work and the state of the art
- Cases of non-implementation under the previous regulation



Participation in Events Organised by our Members





2020 EHPM Publications

EHPM Manifesto

In February 2020, EHPM published its manifesto entitled “Food supplements for healthier citizens and a stronger economy in the EU.” The idea behind this manifesto is:

- 1

To present the food supplement sector to the new term within EU institutions with a clear description of what a food supplement is; the role of food supplements and their contribution to citizens’ wellbeing by maintaining the normal state of homeostasis and reducing the diet related risk factor of certain diseases; the positive impact on healthcare system’s costs; and the important role of SMEs.
- 2

To overcome the misconception around the sector by describing the legitimate role in citizens’ wellbeing improvement; presenting the High-Quality Standards and Good Manufacturing practices & the Industry commitment to further improve them; showing the industry’s will to establish a nutravigilance system; promote effective truthful and professional communication to all the stakeholders to clearly define the identity & function of food supplements
- 3

To give an overview of the regulatory challenges the sector is facing, for instance on REFIT of EU Legislation on Nutrition & Health Claims (EC) Reg. 1924/2006; the use of Art. 8 of (EC) Reg. 1925/2006; the shortcomings of the approach to the safety assessment of botanicals; and the lack of harmonisation concerning the use of the term probiotic in the EU.
- 4

To provide concrete solutions to the regulatory challenges and show the proactivity of our sector with the publication of EHPM’s proposal on a graded approach for Botanical Health Claims on Foods and Food Supplements in the EU; working in cooperation with EU academics on the development of proper guidelines for the safety evaluation of botanicals; the acknowledgment of the term “contains probiotics” with clear and appropriate conditions of use that authorities can verify using simple criteria.
- 5

To present the EHPM priorities for 2019-2024 that include overcoming regulatory uncertainty by addressing the regulatory challenges that cause a lack of innovation or push the sector to lag behind its full potential; supporting the EU Green Deal by promoting the safety and quality of the food ingredients used in food supplements (with the publication of an EHPM Quality Guide and the implementation of a post market surveillance system); and the Farm to Fork strategy by contributing to the transformation of the way of living, working and consuming so that EU citizens live healthier longer.

“Food supplements are safe and truthful products that help EU citizens live healthier longer”

Health Claims on Food and Food Supplements in the EU - EHPM Proposal

In this paper, EHPM presents a Graded Approach to Health Claims, as applicable to botanical foods in general and botanical food supplements in particular. The approach has been developed to be consistent with both the fundamental requirements of the NHCR and the systematic procedures already adopted by EFSA.

The proposal highlights the proactive approach of EHPM and its will to cooperate with the EU institutions and stakeholders to address the regulatory issues that the food supplement sector faces in order to develop a fair regulatory framework that serves consumers as well as producers.

The EHPM proposals re-prioritise consumer choice and develop assessment methodologies, which reflect the long term, iterative nature of scientific inquiry. The approach shows that it is possible to grade botanical health claims from the certain to the plausible, to evaluate these claims by reference to specified levels of evidence and to use qualified language to communicate the outcomes of these evaluations to consumers in a useful, honest, accurate and meaningful way. This approach logically involves dealing with uncertainty, but, the methodology proposed shows that this can be achieved without compromising the required stringency.



2020 Communications Review

EHPM undertook a range of communications activities in 2020. This includes email updates sent to our members, active engagement on social media and influential new connections established with the press.

1. Email Updates

Over the course of 2020, we have sent 66 updates ranging from weekly snapshots, policy updates and quarterly international regulatory supplements, with an open rate of 42.2% and a click rate of 13%. The graph shows a rigorous click and open rate over the past 5 months.



2. Social Media Review

In cooperation with Edelman, EHPM has increased its presence and audience on its key social media channels: Twitter and LinkedIn. This resulted in a growing awareness of EHPM’s activities and events, as well as new opportunities in attracting new members.

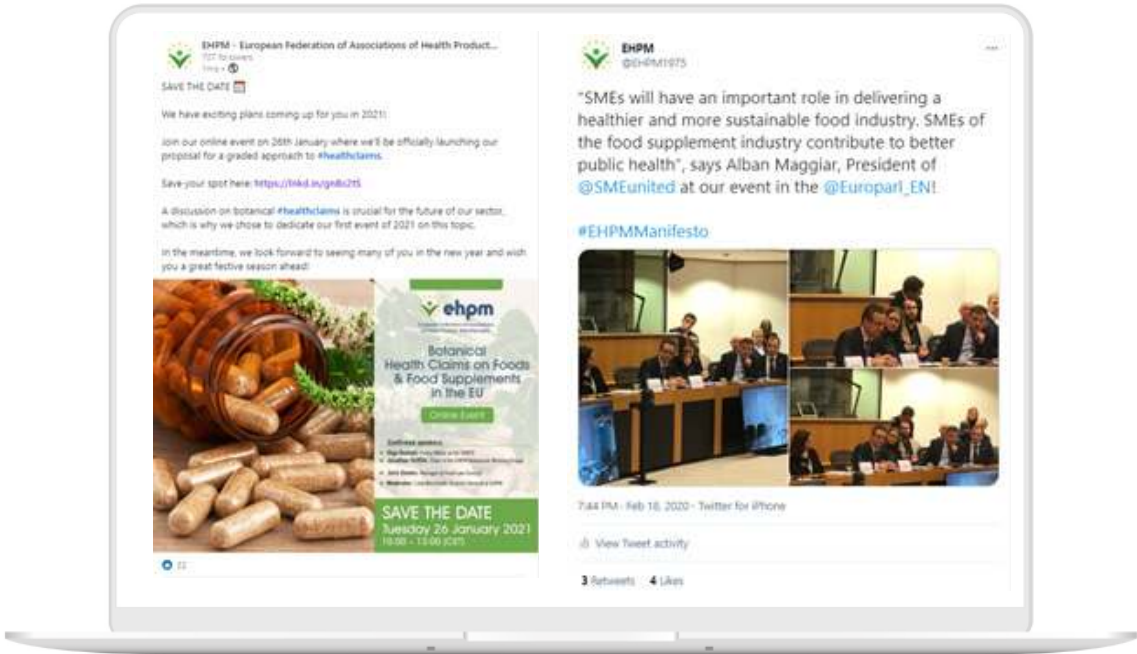
EHPM on Twitter

EHPM’s Twitter account grew significantly in 2020 with 104 new followers and more than 1.6K profile visits. Its tweet’s impressions reached 79.3K and EHPM itself was mentioned in 63 tweets. EHPM’s Twitter performance peaked in early 2020 in February – March reaching ultimate highs in tweet impressions that were driven by its event organised in the European Parliament. Its follower growth also peaked in September and October during the promotion of our webinar on the Mutual Recognition Regulation.

EHPM on LinkedIn

Similar to Twitter, EHPM’s LinkedIn page showed significant growth throughout 2020. It received more than 1.8K page views and 470 new followers. Posts published in 2020 earned more than 10.1K impressions, with ultimate highs reached around the promotion of the webinar on the Mutual Recognition Regulation and EHPM’s Botanical Paper. As such, LinkedIn remains EHPM’s strongest channel in comparison to Twitter when it comes to follower growth, while Twitter is strongest in terms of post impressions.

- Overall we have seen that:
- The promotion of events or upcoming publications such as the botanicals paper were a key driver for growth and engagement on our channels;
 - On twitter specifically, we have also noticed that educational content with easy-to-share stats and infographics are receiving high levels of engagement;
 - Our members are amongst our strongest followers engaging with our content online



Social Media Activity 2020

Twitter		LinkedIn	
+ 104	New Followers	+ 470	New Followers
1.6k	Profile Visits	1.8k	Page Views
79.3k	Impressions	10.1k	Impressions



Platform Strenght:
Post Impression



Platform Strenght:
Follower Growth



3. New Connections with the Press

EHPM extended its presence in the press in 2020 by developing new partnerships and securing key pieces of coverage.

Our partnership with EURACTIV helped us increase our visibility in EU media. We ran a banner campaign on euractiv.com from 28th September to 11th October 2020 yielding more than 200K impressions and 85 clicks. In addition, EURACTIV featured key messages from EHPM, for instance on the promotion of its online workshop on Mutual Recognition Regulation and the #WeFightForNaturalHealth campaign.

In addition, we partnered with Politico, DODS (The Parliament Magazine) and Nutraingredients.



EHPM Priorities for 2021

For 2021 EHPM plans to further increase its efforts in representing, inspiring, and supporting the food supplement sector in Europe by implementing a comprehensive strategy built on three pillars: policy, lobby & communication, and structure.

1	<p>To strengthen its proactive approach to solving both longstanding and new policy issues, EHPM aims to:</p> <ul style="list-style-type: none">• Continue to address the Art.8 Reg.1925/2006 issue from a regulatory, procedural, legal, and scientific perspective:<ul style="list-style-type: none">• Contribution to the EFSA’s public consultation on Alpha-Lipoic Acid (by the 25th February);• Contribution to the European Commission public consultation on Monacolins from Red Yeast Rice, Green Tea Catechins and other ingredients that will be under Art.8 procedure.• Develop an EHPM position on probiotics.• Develop an EHPM position on the use of Additives in food supplements for infants and young children.• Develop a concrete proposal on the safety of botanicals.• Continue the work on suggesting an alternative safety assessment methodology for botanicals asking more constructive dialogue with EFSA and the European Commission.• Update the EHPM model on Maximum Levels for Vitamins & Minerals.• Update the EHPM Quality Guide.• Update the EHPM Country Profiles.• Publish the EHPM manifesto on Nutrivigilance as a result of the EHPM Task Force on Red Yeast Rice.• Disseminate the EHPM proposal to address the Claims Regulation flows and provide concrete examples of the three graded claims.• Monitor the Novel Food Regulation and the possible classification of certain ingredients used in food supplements as Novel.• Monitor the CBD issue in the EU and worldwide.
2	<p>To make sure that EHPM’s message and efforts reach the relevant policy makers as well as consumers and the industry, EHPM’s Lobby & Communication strategy will focus on:</p> <ul style="list-style-type: none">• Enlarging the network of supportive MEPs by, for example, increasing the visibility of EHPM through thematic workshops.• Strengthening the relation with the European Commission DG SANTE Unit E1 and E2, and DG GROW.• Developing relations with consumers’ associations and other relevant stakeholders.• Developing a network of scientific representatives to support EHPM.• Developing a “European Projects alert” as part of the EHPM Policy Update for our members.
3	<p>To acquire the resources necessary to implement all the above activities, EHPM foresees to strengthen its structure by:</p> <ul style="list-style-type: none">• Supporting its members to reach their full potential.• Enlarging its membership with new joiners.• Strengthening the in-house capabilities of the EHPM Secretariat.



European Federation of Associations
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