

Comments from The Norwegian Scientific Committee for Food Safety (VKM) on the draft Guidance Document on allergenicity assessment of genetically modified plants for public consultation Sept. 2016

The Norwegian Scientific Committee for Food Safety (VKM) recognises the need for amendments to the current version of the EFSA guidance for submission of GMO applications with concern to allergenicity and non-IgE-mediated adverse immune reactions.

VKM endorses the draft guidance document with the proposed adjustments for assessment of i) non-IgE-mediated adverse immune reactions to food, ii) *in vitro* digestibility testing in the prediction of potential allergenicity and other adverse immune reactions of the newly expressed protein, and iii) quantification of endogenous allergens in both the modified and comparator plants. These implementations are important for further protection of vulnerable consumer groups.

The high degree of focus on celiac disease may be interpreted as rather one-sided, but the VKM recognises the knowledge gaps concerning other non-IgE-mediated adverse immune reactions that hinder a broader approach.

Especially the refinements to the *in vitro* digestibility testing in the prediction of potential allergenicity and other adverse immune reactions of the newly expressed protein is a considerable improvement.

We look forward to the final draft with refined, clarified conclusions.