



Persatuan Pengguna Pulau Pinang Consumers Association of Penang

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Letter to the Editor

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Unreviewed Food Additives and Malaysia's Imported Food Risk

The Consumers' Association of Penang is concerned by a recent analysis by the Environmental Working Group (EWG), which highlights a structural weakness in the United States food regulatory system: more than 100 food-related chemicals entered the market without formal review by the U.S. Food and Drug Administration (FDA), the national regulator.

These substances were introduced under the "Generally Recognized As Safe" (GRAS) framework, which allows manufacturers to determine ingredient safety without mandatory notification to authorities. While legal and longstanding, this system raises important questions about transparency, oversight and accountability in modern food systems.

Although specific to the United States, the findings have broader international relevance. In a globalised food supply chain, regulatory decisions in one country can have far-reaching implications. For Malaysia, which imports substantial volumes of processed and value-added foods, this issue warrants attention. The concern is not that these ingredients are necessarily harmful, but that they may not have undergone independent, transparent evaluation before entering international markets.

Malaysia's food safety regime, governed by the Food Act 1983 and Food Regulations 1985 and administered by the Ministry of Health, is generally robust, with clear requirements on labelling, permitted additives and contaminant limits. However, like many countries, Malaysia relies significantly on documentation, certification and international standards when assessing imported foods. It is neither practical nor feasible to conduct full toxicological reassessments of every ingredient.

This creates a potential blind spot. Ingredients self-certified as safe in their country of origin, and not explicitly prohibited under Malaysian law, may enter the domestic market without independent scrutiny. Malaysia may therefore be indirectly relying on foreign regulatory systems, even where industry self-approval is permitted.

The implications are most evident in highly processed, functional and health-oriented foods, which often contain novel additives, plant extracts and bioactive compounds. These are marketed for perceived health benefits, yet supporting evidence can vary, particularly in concentrated or modified forms.

While many such substances may ultimately be safe, the absence of independent evaluation introduces uncertainty. In Malaysia, this is compounded by differences in dietary patterns, cumulative exposure and population sensitivities that may not have been considered in original assessments.

Importantly, the presence of an unreviewed ingredient does not equate to a public health hazard. Food safety is risk-based, and many substances are safe within limits. The core issue is governance: who determines safety, on what evidence and with what transparency. When decisions rest solely with manufacturers, public confidence may be affected.

From a policy perspective, this presents both challenges and opportunities. Tightening import controls and requiring comprehensive pre-market evaluation could be burdensome and disrupt trade. Conversely, maintaining the status quo may leave oversight gaps as new substances emerge.

A balanced approach is needed. Strengthening disclosure requirements for imported foods, especially for novel ingredients, would improve transparency. Importers could be required to provide clearer information on regulatory status and whether independent review has occurred.

Expanding post-market surveillance is another practical measure. Authorities can monitor products in circulation, conduct targeted testing and respond to emerging concerns. This approach is flexible, resource-efficient and consistent with international best practices.

Consumer awareness also matters. While responsibility should not fall solely on individuals, informed choices can reduce exposure to uncertain risks. Diets emphasising whole and minimally processed foods are less likely to include complex additives. Public education can reinforce this without causing undue alarm.

At the international level, the issue underscores the need for harmonisation and cooperation. Strengthening global standards and promoting transparency in ingredient approval processes can help address systemic gaps.

In conclusion, the EWG findings are relevant to Malaysia not because they indicate immediate danger, but because they highlight structural features of the global food system. As Malaysia continues to diversify its food supply, it must remain vigilant. Enhancing transparency, strengthening surveillance and promoting informed consumption can mitigate risks while preserving the benefits of an open market.

The broader lesson is clear: food safety is an evolving process that must adapt to new technologies, products and regulatory realities. Maintaining a credible, transparent and science-based system is essential for protecting public health and sustaining consumer trust.

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