

# Risk management recommendation on market authorisation of one traditional food notification January 2026

The Food Standards Agency (FSA) risk management recommendations on one traditional food from a third country notification.

## Subject and purpose?

On this page we publish the Food Standards Agency (FSA) risk management recommendations on one traditional food from a third country notification.

The FSA?and Food Standards Scotland (FSS)?risk assessors deliver the?science behind our advice. They?are responsible for?identifying?and?characterising?hazards and risks to health and assessing exposure levels.?For this traditional food,?The Advisory Committee on Novel Foods and Processes (ACNFP) reviewed the notification and issued their output. The FSA's response to their output can be found in the following Annex.

The FSA will be making a formal submission to ministers in England and Wales on the final terms of authorisation and will consider stakeholders' views received from this consultation. FSS will write to their minister with the terms of authorisation recommendations which will have considered stakeholders' views as a result of this consultation.

## List of Annexes

Annex A: RP2272, Bambara groundnut (seeds and seed flour of *Vigna subterranea* (L.) Verdc.) (new) (Traditional Food)

## Annex A

### FSA risk management recommendations

#### **RP2272 Bambara groundnut (seeds and seed flour of *Vigna subterranea* (L.) Verdc.) (new) (Traditional Food)**

##### Introduction?

A notification for the traditional food,?Bambara groundnut (seeds and seed flour of?*Vigna subterranea*?(L.)?Verdc) was?submitted?to the FSA for authorisation in Great Britain (GB) in October 2024 by?WhatIF?F&I Pte Ltd.

For?a?traditional?food?from a third country?to?be placed on the market in GB, a notification shall be?submitted?in accordance with?[assimilated Regulation \(EU\) 2015/2283](#) ("the?Novel Food

Regulations").??

Under Article 14 of the Regulation, traditional foods which have a history of safe use in a third country, as defined by Article 3.2(b) of the Novel Food Regulations, can be authorised by ministers. These authorised traditional foods will have been safely consumed outside of the United Kingdom and the European Union for at least 25 continuous years before the notification is made.?

#### **Scientific output?summary?and protective?measures?**

The Advisory Committee on Novel Foods and Processes (ACNFP) has reviewed the notification and issued their output:

- ACNFP Bambara groundnut consultation conclusion
- ACNFP Bambara groundnut discussion paper

The FSA has thoroughly considered this output and has concluded that the hazards outlined by ACNFP can be controlled by applying protective conditions of use, ensuring the safety of consumers. The FSA has also concluded that, in addition to the controls under the Novel Foods Regulations, existing regulatory frameworks provide further protections to consumer safety including the provisions of General Food Law (assimilated Regulation (EC) 178/2002), and General Food Hygiene?Regulations (assimilated?Regulation?(EC)?852/2004); the FSA therefore has no reasoned safety objections to the placing on the market of the traditional food in GB.

The FSA recognises the following key elements from the ACNFP's output which require further appropriate risk mitigation to ensure continued consumer safety:??

- allergenicity from cross-reactivity for other legume allergens, for example, peanuts
- presence of phytotoxins and antinutrients in the raw traditional food
- presence of mycotoxins in the traditional food
- effective controls to minimise microbial growth

The FSA therefore proposes the following conditions for the authorisation of the traditional food to protect consumers from these hazards:?

1. To mitigate the risk of exposure of legume allergic consumers to the traditional food, the FSA proposes that foods containing the traditional food are clearly labelled that 'the seeds and seed flour of *Vigna subterranea* may cause allergic reactions to consumers with allergies to peanuts and soybeans'.?
2. Similarly to other raw legumes? (e.g. kidney beans, chickpeas, lentils)? which contain phytotoxins and antinutrients,? levels? can be? significantly? reduced through simple preparation techniques? such as soaking and?boiling. The FSA therefore proposes? additional? labelling? that the product must be soaked and boiled before consumption? to reduce the presence of phytotoxins and antinutrients to safe levels.?
3. To reduce the exposure of consumers to mycotoxins from the traditional food, the FSA proposes? to apply maximum levels? for? mycotoxins to ensure consumer safety;? proposals are? in line with established? protective? maximum levels for similar products? as set in assimilated Regulation (EC) No. 1881/2006,? and are set as low as reasonably achievable.
4. The FSA proposes? the reduction? of the? limits for 'yeast and mould count' and 'total plate count' requested? by the applicant to? match? established standards? and measures? which? protect consumer safety and ensure? high? standards? in the? production? of the traditional food.?

The proposals are reflected in the following terms of authorisation.

## Relevant legislation?

- [Assimilated Regulation \(EU\) 2015/2283 \("the?Novel Food Regulations"\)](#)
- [Assimilated Regulation \(EU\) 1169/2011?on the provision of food information to consumers](#)

## Terms of authorisation?

Authorised Novel Food??	Conditions under which the novel food may be used??	Additional?specific labelling requirements??	Other requirements??
Seeds and seed flour of?Vigna subterranea?(L.) Verdc.? (Traditional?food from a third country)?	Specified food category??	Maximum levels??	<p>1. The designation of the?novel food?on the labelling of the food ?containing?it?must?be? 'Bambara (Vigna subterranea) seeds/nut/bean/groundnut ?or 'Bambara (Vigna subterranea) seed/nut/bean/groundnut flour' depending on the form used.?</p> <p>2. The labelling of the?food? containing?the traditional food? must?bear a statement that?the seeds and the seed flour of? Vigna subterranea?may cause allergic reactions to consumers with known allergies to peanuts and?soybeans. This statement shall appear?in close proximity to?the list of ingredients or, in the absence of a list of ingredients,?in close proximity to?the name of the food.?</p> <p>3. When the seeds are sold uncooked, the labelling?must? bear a statement that?they? should be soaked and boiled before consumption.?</p> <p>4. The food information must be presented?in accordance with?the provisions of?assimilated?Regulation (EU) No 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers (EUR 2011/1169) which apply to mandatory food information.??</p>
	Not specified??	??	??

## Specification

The proposed terms of authorisation are set out in the following table:

Authorised Novel food??	Specification???

**Description/Definition:?**

The traditional food consists of de-shelled whole dried seeds of *Vigna subterranea* (L.) Verdc. [Family: Fabaceae (alt. Leguminosae)] or the flour obtained by several steps, including heat treatment and milling of the seeds.?

Synonyms: *Cryptolobus subterraneus* (L.) Spreng., *Glycine subterranea* L., *Tetrodea subterranea* (L.) Raf., *Voandzeia subterranea* (L.) Thouars.?

Common names: Bambara groundnut, Bambara nut, Bambara bean, Bambara pea, Nyimo?bean.?

**Dried seeds:?****Typical composition range:??**

Moisture: 7-11 %?

Protein: > 15 %?

Carbohydrates: 32?-?65 %?

Sugar: < 6.0 %?

Fat: 4-7 %?

Fiber: 7-31 %?

**Heavy metals:??**

Arsenic: < 0.05 mg/kg?

Cadmium: < 0.02 mg/kg?

Lead: < 0.05 mg/kg?

Mercury: < 0.01 mg/kg?

**Mycotoxins:?**

Sum of Aflatoxins (B<sub>1</sub>+B<sub>2</sub>+G<sub>1</sub>+G<sub>2</sub>): < 4??g/kg?

Aflatoxin B1: < 2??g/kg?

Sum of Fumonisin (B<sub>1</sub>+B<sub>2</sub>+B<sub>3</sub>): < 60??g/kg?

Deoxynivalenol: < 0.1 mg/kg?

Ochratoxin A: < 0.5??g/kg?

Zearalenone: < 0.1 mg/kg?

**Other contaminants or anti-nutrient factors:?**

?Hydrocyanic acid (including hydrocyanic acid bound in cyanogenic glycosides): < 15 mg/kg?

**Microbiological Criteria:?**

Aerobic mesophilic spores: < 1 Spore/g?

Alicyclobacillus: Not detected in 10 g?

Presumptive?Bacillus cereus: < 10?cfu/g?

Coliforms: < 10?cfu/g?

Escherichia coli: < 10?cfu/g?

Salmonella: Not detected in 25 g?

Staphylococcus aureus: < 10?cfu/g?

Total Plate Count: < 5?000?cfu/g?

Yeast & Moulds: < 100?cfu/g?

**Dried seed flour:?****Typical composition range:??**

Moisture: 4-7 %?

Protein?: > 15 %?

Carbohydrates: 55-75 %?

Sugar: < 20 %?

Fat: 4-9 %?

Fiber: 10-30 %?

**Heavy metals:??**

Arsenic: < 0.05 mg/kg?

Cadmium: < 0.02 mg/kg?

Lead: < 0.05 mg/kg?

Mercury: < 0.01 mg/kg?

**Mycotoxins:?**

Sum of Aflatoxins (B<sub>1</sub>+B<sub>2</sub>+G<sub>1</sub>+G<sub>2</sub>): < 4??g/kg?

Aflatoxin B<sub>1</sub>: < 2??g/kg?

Sum of Fumonisin (B<sub>1</sub>+B<sub>2</sub>+B<sub>3</sub>): < 60??g/kg?

Deoxynivalenol: < 0.1 mg/kg?

Ochratoxin A: < 0.5??g/kg?

Seeds and seed flour of *Vigna subterranea* (L.) Verdc. (traditional?food from a third country)?

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## **Proposed uses**

Per the terms of the traditional food notification process, the authorised uses may only be those covered by traditional use?evidenced?in the notification. As evidence was?demonstrated?for the continuous safe use of the traditional food in the form of whole seeds and seed flours in a third country for 25 years,?the food's uses are restricted to seeds (cooked or uncooked) and seed flours.

## **Supplementary information??**

N/A?

## **Labelling?**

[Article 9\(3\)\(b\) of assimilated Regulation \(EU\) 2015/2283](#)?provides that an authorisation of a novel food should include?additional?specific labelling requirements.?

- The designation of the novel food on the labelling of the food?containing?it?must?be 'Bambara (*Vigna subterranea*) seeds/nut/bean/groundnut' or 'Bambara (*Vigna subterranea*) seed/nut/bean/groundnut flour' depending on the form used.?
- The labelling of the food?containing?the traditional food?must?bear a statement that?'the seeds and the seed flour of?*Vigna subterranea*?may cause allergic reactions to consumers with known allergies to peanuts and?soybeans'. This statement shall appear?in close proximity to?the list of ingredients or, in the absence of a list of ingredients,?in close proximity to?the name of the food.?
- When the seeds are sold uncooked, the labelling shall bear a statement that?they?should be soaked and boiled before consumption.?

The food information must be presented?in accordance with?the provisions of [Regulation \(EU\) No 1169/2011](#) of the European Parliament and of the Council on the provision of food information to consumers (EUR 2011/1169) which apply to mandatory food information.??

## **Transitional requirements/ provisions?**

N/A?

## **Further explanation/ rationale?**

N/A?

## **Post?market?monitoring?**

N/A??

## **Definitions?**

N/A??

## **Other legitimate factors?**

N/A?

## **Impacts?**

As part of the risk analysis process, FSA?has?assessed the potential impacts that would result from the authorisation of this?traditional food.?No significant impacts were?identified. The impacts considered included those most?frequently?identified as potential impacts when introducing or amending food and feed law (i.e. environmental, trade, and consumer interests).??

The authorisation of>this?product should?generally result?in greater market competition, supporting growth and innovation in the sector.?

## **Trade?**

Food exported from the UK to other countries/blocs?will need to continue to meet the?rules?of those countries/blocs.?

## **EU**

Bambara groundnut (seeds and seed flour of?Vigna subterranea?(L.)?Verdc.)?is already approved for use in the EU.

## **Northern Ireland?**

This product?is already authorised for use in Northern Ireland. The authorisation of this product in GB would create alignment with Northern Ireland.??

## **Risk management recommendation?**

The FSA?risk management recommendation?concludes Bambara groundnut (seeds and seed flour of?Vigna subterranea?(L.)?Verdc.)?as described in this notification,?is?safe and?is?not liable to have an adverse effect on the target population, environmental?safety?and human health at the intended concentrations of use.?