Chancellor of Justice

Teresa Anjinho
European Ombudsman
[redacted]

Your ref. 20.04.2026 No OI/1/2026/AML

Our ref. 02.06.2026 No 5-2/2603341

Re: Rapid Alert System for Food and Feed (RASFF)

Dear colleague,

Thank you for your letter concerning the functioning of the European Union's Rapid Alert System for Food and Feed (RASFF). The Chancellor of Justice of Estonia welcomes the European Ombudsman's initiative to examine how this system works in practice, including from the perspective of national authorities. The proper functioning of RASFF is essential for the protection of public health and consumer rights in the internal market.

To provide a substantiated reply, the Chancellor of Justice asked for input from the Estonian National Audit Office and the Agriculture and Food Board, which is the competent authority responsible for food and feed safety supervision in Estonia.

The National Audit Office referred to its 2019 report to the Riigikogu entitled "Activities of the state in guaranteeing food safety. Does the state know the risks that arise from pesticide residues in food and inform people about them?". Although the audit focused primarily on risks related to pesticide residues in plant-based food and mentioned RASFF only briefly, its findings are relevant to the broader functioning of food safety controls and rapid alert mechanisms.

The National Audit Office found that, at the time of the audit, Estonia's food safety system did not provide a sufficiently robust basis for general statements that food sold in Estonia was safe. The audit pointed to the small number of food studies and laboratory analyses, shortcomings in supervision, and insufficient public information about risks related to pesticide residues. The National Audit Office also found that the authorities focused mainly on whether maximum residue limits had been exceeded, while less attention was paid to cumulative exposure, dietary habits, and risks for more vulnerable consumer groups. It further noted that supervision was not sufficiently risk-based, as the authorities did not have adequate information on which crops were most intensively treated with pesticides and fertilisers.

The audit also identified practical problems relevant to RASFF. It found that perishable foodstuffs containing hazardous quantities of pesticide residues could reach consumers before the authorities were able to react. Laboratory results were often received only after a considerable delay, and where another Member State had notified hazardous food through the EU rapid alert system, identifying distributors in Estonia also took time. The National Audit Office therefore recommended that the competent authority follow the relevant hazard assessment criteria and European Commission guidance when assessing tested food and

submitting notifications to RASFF, and that it use the EFSA PRIMo model for assessing pesticide-residue risks.

The Chancellor of Justice notes that the audit had a significant impact on food safety controls in Estonia. Following the audit, the state allocated additional funding for more food safety analyses. Even though RASFF itself was not the central subject of the audit, the data available in RASFF indicate that the number of Estonian notifications increased significantly after the audit and that the notifications became more diverse. In our view, this suggests that improved analytical capacity and more systematic testing also strengthened Estonia's contribution to EU-level food safety information exchange.

The Agriculture and Food Board assessed RASFF, based on Estonia's practical experience, as generally effective and useful. According to the Board, RASFF is an important tool for the rapid exchange of information on food and feed safety risks and enables competent authorities to receive operational information about cases that may also affect the Estonian market. The system supports timely risk identification, the planning and implementation of supervisory measures, and cooperation between Member States. The Board also noted that RASFF may help identify food or feed business operators that have not notified their activities to the competent national authority.

The Board considered the exchange of information between Member States and the European Commission to be, as a rule, sufficiently rapid and efficient. It highlighted as strengths the operational nature of the system, the standardised structure of information exchange, and the possibility for the Commission and Member State contact points to communicate on a 24/7 basis. This is particularly important where a dangerous product has been distributed in several Member States or where the risk requires immediate action.

At the same time, the Agriculture and Food Board identified certain practical shortcomings. Given the very large number of notifications processed in the system, problems occasionally arise concerning the quality, timeliness, and follow-up of notifications. Initial notifications may be incomplete or may require clarification; for example, batch information, supply-chain documentation, distribution data, or information on measures already taken may be missing. This can slow down the impact assessment of a case and the planning of necessary measures. The Board emphasised, however, that it does not consider these shortcomings to be systemic; rather, they are individual issues that are difficult to avoid in a system dealing with large volumes of data and complex cross-border cases.

The Board sees the main development needs in improving the quality, completeness, and consistency of notifications, so that Member States can assess more quickly whether a case may affect their market. It also considers it important that follow-up measures be reflected more consistently, so that it is clear what action has been taken in different countries. The usability and data structure of iRASFF should also be improved. In practice, very long notification threads may make it difficult to identify key information quickly and clearly follow the different stages of the procedure.

The Agriculture and Food Board also considers that the analytical capacity of the system should be strengthened to better identify recurring problems, risk trends, and weaknesses by product, country of origin, or type of hazard. In its view, RASFF is a strong and functioning response mechanism, but its effectiveness depends largely on the timely detection of hazards, the traceability of supply chains, the responsibility of food business operators, and clear and reliable public communication.

Recent practical examples confirm both the strengths and the limitations of the system. The ethylene oxide cases involving sesame seeds and products made from them demonstrated the value of RASFF in rapidly transmitting information between Member States and coordinating extensive recalls. At the same time, they showed that, where a hazard is detected at a late stage, contaminated raw material may already have been widely distributed. Listeria monocytogenes cases in ice cream and frozen products confirmed the usefulness of RASFF for exchanging laboratory results and removing products from the market, but also showed that establishing epidemiological links may take time and that frozen products may remain in consumers' homes even after a recall has been initiated. Salmonella cases in chocolate products showed the value of coordinated information exchange and rapid recall, but also underlined that RASFF does not replace companies' own controls or early intervention at the production stage. Recurrent cases involving aflatoxins in nuts and dried fruit and pesticide residues in fruit and vegetables illustrate the system's usefulness in identifying risk patterns and directing risk-based import controls, while also showing that RASFF does not, by itself, eliminate the underlying causes of such risks.

In conclusion, Estonia's experience indicates that RASFF is an indispensable and generally well-functioning tool for rapid cross-border food and feed safety communication. The Estonian experience also shows, however, that the effectiveness of the system depends not only on the speed of information exchange at the EU level, but also on the quality of national controls, laboratory capacity, traceability, the completeness of notifications, and consistent follow-up by all parties involved.

We hope that these observations are useful for your inquiry and wish you every success in carrying it out.

Sincerely yours,

/ Digitally signed /

Ülle Madise
Chancellor of Justice of Estonia

Enclosers:

1. National Audit Office's report "Activities of the state in guaranteeing food safety. Does the state know the risks that arise from pesticide residues in food and inform people about them?" in English.
2. Summary of the National Audit Office's report in English.

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