

Reading Scientific Services Ltd  
Reading Science Centre, Whiteknights Campus,  
Pepper Lane, Reading, Berkshire RG6 6LA, UK

24 April 2026

Reference: Novel gap assessment (B25-00408)

To whom it may concern,

### **Independent Scientific Review: UPP “Fiba” Product (Novel Food Assessment)**

Reading Scientific Services Limited (‘RSSL’) is a scientific services organisation with deep expertise in food safety, regulatory science, and novel food assessment. RSSL provides integrated capabilities spanning analytical chemistry, microbiology, toxicology, exposure assessment, and regulatory interpretation across UK, EU, and international food law frameworks.

RSSL has extensive practical experience evaluating ingredient identity, compositional equivalence, manufacturing processes, and safety data in the context of novel food determinations, including assessments relating to history of consumption, process-driven material change, and intended use exposure. Its scientists routinely support Article 4 consultation submissions, novel food applications, and pre-market regulatory strategies, and work closely with both multinational food producers and emerging ingredient innovators.

RSSL was engaged as an independent scientific service provider to review the approach taken by Upcycled Plant Power (UPP) Limited (‘UPP’) to support assessment of its “Fiba” product, specifically with respect to assessment of novel food status. RSSL’s review was a document-based scientific assessment of the materials provided by UPP and did not constitute a regulatory submission, authorisation, or certification audit.

### **Scope of RSSL’s review**

Based on the information made available to RSSL by UPP at the time of review, RSSL:

- considered the intended use of the Fiba product as an ingredient for the general population, at an inclusion level of up to 20%;
- reviewed the approach and rationale applied by UPP in assessing whether the Fiba product may be considered novel or non-novel;
- reviewed the comparator products referenced by UPP as potentially supporting a history of consumption in the UK/EU prior to 15 May 1997;
- reviewed UPP’s risk analysis in relation to the product and its intended use;
- reviewed UPP’s description of the production process, including the fractionalisation of broccoli, and the HACCP controls described by UPP; and,
- reviewed outputs from independent laboratory analyses commissioned by UPP in support of its assessment.

UPP has indicated that it has scheduled an audit under the BRCGS standard for food safety, and RSSL was not engaged to assess any area that overlaps with BRCGS, other than to note the Critical Control Points identified by UPP within the HACCP.

### **RSSL opinion**

RSSL considers that, based on the information provided at the time of review, **the Fiba product is highly unlikely to be considered novel under the relevant UK/EU novel food framework.**

It is noted that only the appropriate regulatory authorities can provide a formal view on regulatory status (including novel food status). In the UK, this includes the Food Standards Agency ("FSA"), for example via the Article 4 consultation process where applicable.

### **Limitations and disclaimers**


This letter is provided for information purposes only and:

- does not constitute legal advice;
- does not constitute a regulatory determination, authorisation, or approval by a statutory authority;
- does not imply clearance, endorsement, or "quasi-clearance" by the FSA or any other regulator; and,
- should not be considered as a substitute for an assessment by a statutory authority.

UPP remains responsible for ensuring that the Fiba product and its use comply with all applicable legal and regulatory requirements.

To the fullest extent permitted by law, RSSL accepts no liability to UPP or to any third party arising from reliance on this letter or the opinions expressed in it, whether in contract, tort (including negligence), or otherwise. RSSL has granted permission for UPP to publish this letter in full and unedited, provided it is presented with this disclaimer intact.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Daniele Leonarduzzi'.

Daniele Leonarduzzi, Senior Scientist II, Material Sciences Department

For and on behalf of RSSL