ORIGINAL RESEARCH & COMPARATIVE REGULATORY ANALYSIS

A Non-Novel Ingredient Is Not a Blank Cheque

The October 2026 Olive-Pulp Decision, the Boundary Between Powders and Extracts, and the Evidence Needed to Turn Circular Biomass into Safe Food

José M. López, Research Director

ABSTRACT

On 13 October 2026, the European Commission published the outcome of a novel-food-status consultation coordinated by Spain's food-safety authority: a specifically described defatted olive-fruit pulp powder, intended for food supplements, was considered non-novel. The decision is important for Mediterranean ingredient valorisation, but it is not a general safety authorisation, a licence for concentrated olive extracts, or permission to make health claims. Its technical boundaries -fruit identity, de-stoning, defatting, dehydration, particle size and conventional processing- matter as much as its conclusion. This article integrates the consultation record with recent research on olive-pomace composition, drying, food formulation, contaminants and process economics. It distinguishes the legal identity of an ingredient from its manufactured specification and its demonstrated function; compares the EU, Spain, Great Britain and United States; and proposes a prospectively testable source-to-product qualification framework. The opportunity is substantial, but it depends on traceable feedstock, validated hygiene, realistic exposure, lawful claims and measured environmental performance rather than the mere relabelling of an industrial residue.

KEYWORDS: *olive pulp; olive pomace; novel foods; food supplements; upcycled ingredients; polyphenols; food safety; circular bioeconomy*

01 | The October decision is narrower and more useful than a headline

On 13 October 2026, the European Commission published a determination reached through the consultation procedure under Article 4 of Regulation (EU) 2015/2283. The receiving authority was Spain's Agencia Española de Seguridad Alimentaria y Nutrición (AESAN). The product was described as defatted olive-fruit pulp powder obtained from the fruit of Olea europaea L., after de-stoning, defatting and dehydration, with a stated granulometry of 500 µm. The declared intended use was food supplements. The conclusion was 'Not novel food'. This is an official determination of regulatory status for the food as described, not a marketing authorisation for every olive by-product. [1–4]

The justification rested on the significant history of olive consumption in the Union before 15 May 1997 and on the authority's assessment that the specified conventional operations did not generate new compounds relative to the natural olive composition. That reasoning matters: it attaches the decision to material identity and process, not simply to the word 'olive'. The consultation record does not provide a comprehensive toxicological dossier, commercial specification, microbiological certificate or approved list of health claims. [1]

The industrial opportunity is therefore a disciplined one. A business may be able to avoid a novel-food authorisation for a genuinely comparable ingredient and use, while still needing to demonstrate ordinary food-law compliance, fitness for purpose and the scope of lawful labelling. The practical error would be to turn a useful status finding into an unqualified statement that all olive-pomace powders, extracts and food applications have been approved.

02 | What the published decision actually says and what it does not

The Commission's one-page record is unusually informative. It specifies a powder derived from de-stoned and defatted olive pulp, dehydrated and micronised to a nominal particle size of 500 µm, without engineered nanomaterials, and destined for food supplements. It describes the components as those naturally occurring in the olive, albeit in different proportions. The consultation involved Member States and the Commission. It does not set numerical limits for phenolics, residual oil, moisture, metals, microbiology or contaminants. [1]

A 500-µm description is not, by itself, a particle-size distribution, and the published text does not establish whether 500 µm represents a median, maximum, sieve cut or another measure. Likewise, 'defatted' is not a universal residual-fat threshold. Commercial comparability should be supported by actual processing records and compositional ranges rather than a superficial resemblance in product name.

The use stated in the consultation is food supplements. A developer contemplating biscuits, beverages, high-protein snacks or foods for young children must assess whether its intended use and manufacturing process remain within the reasoning of the finding, and whether additional legal questions arise. This is especially important when a processing modification materially changes composition, nutritional value, metabolism or undesirable substances under the novel-food definition. [3,4]

03 | Olive fruit, olive pulp, pomace and extracts are not one ingredient

The term "Olive pomace" can describe heterogeneous streams from two-phase or three-phase oil extraction, containing varying proportions of skin, pulp, residual oil, vegetation water and stone fragments. "Olive pulp" denotes a more specific fruit fraction. A de-stoned, defatted powder differs from whole pomace; an ethanol-enriched phenolic extract differs again; and olive-pit peptides or concentrated hydroxytyrosol preparations can have separate regulatory identities. These distinctions are not pedantic. They determine the hazards, processing burden, specifications and likely food applications. [5–9]

The Commission's status table illustrates the contrast: the aqueous extract of olive fruit containing at least 10% hydroxytyrosol is listed as novel food, whereas the October 2026 defatted pulp powder is not. The two entries should

be read together. The former does not prove that all polyphenols are prohibited; the latter does not exempt any process that concentrates particular constituents far beyond the composition of the assessed powder. [1,2]

For product development, identity should be defined by botanical source, fraction, extraction history, process sequence, residual oil, moisture, particle-size distribution and compositional fingerprint. If the supplier changes any of these, the purchaser needs an evidence-based change assessment, not merely a new certificate carrying the same commercial name.

04 | A status determination is not a food-safety opinion

Novel-food status answers whether the specific food falls within Regulation (EU) 2015/2283. General food law answers whether the food is safe and lawfully placed on the market. Article 14 of Regulation (EC) No 178/2002 prohibits unsafe food; Articles 17-19 establish operator responsibility, traceability and incident duties. Regulation (EC) No 852/2004 adds hygiene obligations. The fact that a material is not novel does not displace any of these requirements. [3,17,18]

Nor is a supplier's assertion of 'natural', 'Mediterranean' or 'upcycled' a substitute for hazard analysis. The intended consumer population, daily serving size, exposure from other foods, microbiological condition, contaminants and stability all matter. A powder intended for a small supplement dose may pose different practical exposure questions from a powder incorporated at several percent into a widely consumed staple food.

Regulatory classification and risk assessment should be separate entries in a product dossier. The first records the status decision and its factual boundaries; the second records measurable product hazards, applicable legal limits, the analytical methods used and the controls needed to maintain a safe finished product.

05 | What the literature establishes about olive-pomace composition

Olive-processing residues can contain dietary fibre, residual unsaturated lipids and phenolic compounds. In a 2021 study, a pulp-enriched olive-pomace powder contained approximately 620 g/kg dietary fibre, while a liquid-enriched powder showed a different composition, including mannitol and hydroxytyrosol derivatives. Those values describe the experimental preparations, not a universal commercial specification. A 2026 review confirms that extraction method, olive origin and processing strongly influence the recovered phenolic profile. [6,7]

The chemical families include *hydroxytyrosol, tyrosol, oleuropein*-related compounds and *bound phenolics*, but the relative abundance of free, conjugated and polymer-associated compounds changes with cultivar, ripeness, extraction and storage. Analytical results reported as gallic-acid equivalents are not equivalent to the concentration of a single identified bioactive molecule. Antioxidant capacity in an in-vitro assay is not a human clinical outcome. [7,8,12]

A commercially defensible ingredient should therefore specify both nutritional attributes -such as dietary fibre and residual fat- and chemically resolved markers where phenolic standardisation is relevant. Claims of uniformity across harvests or plants require longitudinal data.

06 | The processing chain can create or destroy the value proposition

Olive pomace is commonly wet, heterogeneous and biologically unstable if mishandled. A food-grade pathway requires controlled collection, separation of stones and foreign matter, hygienic transport, rapid stabilisation, appropriate defatting and drying, milling and protective packaging. Each operation can improve one property while worsening another: drying reduces water activity but consumes energy; severe heating may alter phenolics and colour; aggressive extraction may improve marker concentration but change regulatory status. [8–11]

A 2026 drying study compared 60, 70 and 80 °C tray-drying conditions and documented different drying rates and changes in phenolic-related measurements. A 2025 study investigated intermittent near-infrared drying, while another 2026 study explored phenolic extraction directly from wet pomace to avoid energy-intensive drying. These are

demonstrations under defined laboratory or pilot conditions, not evidence that one universally optimal industrial process exists. [9–11]

For a powder matching the October status decision, process development should first determine whether the intended operation remains a conventional transformation of olive pulp. A higher-yield selective extraction or fermentation route may be technically attractive, but should be assessed as a potentially different food before capital investment.

07 | A mass balance is the first defence against misleading specifications

Consider a hypothetical 1,000 kg wet stream containing 65% water. It contains 350 kg dry matter. If de-stoning and other separation remove 20% of the initial dry matter, 280 kg of dry solids remain. At 6% final moisture, those solids correspond to approximately 298 kg of powder. This arithmetic is illustrative; it does not describe the October consultation product or any reported commercial yield.

The calculation reveals two common mistakes. First, mass yield cannot be inferred from the reduction in water content alone: stones, residual oil, dissolved solids and rejected material must be accounted for. Second, a contaminant's final concentration cannot be calculated from a simple drying factor without knowing whether the contaminant partitions into the oil, water, pulp or separated residues, or undergoes degradation or formation.

A defensible batch ledger should record incoming mass, moisture and oil; each separated stream; retained dry solids; final powder mass; analytical recovery; and uncertainty. The same ledger can support cost calculations and environmental accounting. A claim that an ingredient is 'concentrated in antioxidants' must be tied to measured chemical retention, not inferred from water removal.

08 | Microbiological control begins before the dryer

Olive-processing side streams may be collected in conditions very different from those of a dedicated food-ingredient factory. Moist material held warm can support microbial growth, and subsequent drying does not automatically reverse every earlier hazard. A low water-activity final powder may inhibit growth during storage without guaranteeing that all pathogens have been inactivated. Hygienic design, time-temperature control and validation of any microbial reduction step are therefore central. [17,18]

A risk-based plan should address raw-material origin, collection vessels, contact surfaces, transport times, sanitation, environmental monitoring, moisture and water activity, and the potential for post-drying recontamination. Microbiological specifications must be set with reference to intended use and applicable law; the presence of a negative sample is not proof of absolute absence throughout a heterogeneous lot.

If a supplier asserts that a drying or mineral-treatment process eliminates Salmonella, spores or other hazards, the claim requires process-specific validation with suitable target organisms or surrogates. This article makes no claim that any INTABIOTECH technology has been validated for olive-pulp decontamination.

09 | Chemical hazards must be assessed in the actual fraction

The relevant chemical risk screen may include pesticide residues, heavy metals, selected processing contaminants, cleaning-agent residues and oxidation products. The applicable EU maximum levels depend on the legal food category and the contaminant: Regulation (EU) 2023/915 sets limits for specified food-contaminant combinations, while Regulation (EC) No 396/2005 governs pesticide residues and their treatment in processed products. There is no defensible universal 'olive-pomace contaminant limit' that can be borrowed from a different commodity. [15,16]

A 2026 paper on polycyclic aromatic hydrocarbons (PAHs) in olive-pomace oil is a warning about particular high-temperature oil-refining pathways, not proof that the same levels occur in de-stoned, defatted olive pulp powder. It would be scientifically unsound to transpose its oil measurements to the October powder without sampling and process-specific evidence. Conversely, the absence of such a published powder result is not proof of absence. [14]

The analytical plan should start with source and process history, then select validated tests with matrix-appropriate detection limits. Testing every conceivable contaminant in every lot indefinitely is not necessarily rational; a justified risk-based programme with source-change triggers and periodic verification is.

10 | Food functionality must be demonstrated in the intended matrix

High-fibre powders can modify water binding, oil holding, viscosity, texture, colour and flavour. These properties may be useful in bakery systems, meat alternatives, sauces and dry mixes, but the outcome is formulation-specific. A 2026 bread study evaluated 1%, 2%, 5% and 7% additions of dried olive pomace and found changes in antioxidant measurements and sensory performance; the higher addition levels were associated with more noticeable texture, colour and bitterness effects. Those results cannot be assigned automatically to the differently processed October powder. [13]

The difference between a technically functional ingredient and a nutritionally effective ingredient is important. Increased total phenolic content in bread does not establish bioavailability or clinical benefit. Improved water binding in a laboratory assay does not establish shelf-life extension in a packaged commercial food. A powder's contribution to fibre labelling depends on its content in the finished product and the legal conditions for the claim.

An application programme should therefore compare control and test formulations under matched processing, evaluate consumer acceptability and instrumental texture, and verify stability, microbial behaviour and nutritional composition. When the proposed use differs from the supplement use in the status record, the regulatory analysis must be revisited.

11 | A numerical example: why a fibre-rich ingredient may not justify a claim

Assume, hypothetically, that a qualified olive-pulp powder contains 60% dietary fibre and is added at 3% by weight to a product with negligible background fibre. Its nominal fibre contribution would be 1.8 g per 100 g finished food before accounting for processing, formulation and analytical variation. This is below the EU 'source of fibre' threshold of 3 g per 100 g, unless the alternative energy-based criterion is met. The 'high fibre' threshold is 6 g per 100 g, again with an alternative energy-based criterion. [20]

If the same powder were used at 10%, its nominal contribution would be 6 g per 100 g, but such a high loading could materially alter sensory and technological properties and might fall outside the intended use considered in the October consultation. A nominal calculation is not a label claim: the final food must meet the relevant conditions and be supported by a suitable composition assessment.

This example also shows why 'fibre-rich raw material' and 'high-fibre final product' are not synonyms. Regulatory, sensory and nutritional optimisation must be performed on the same formulation rather than on separate idealised assumptions.

12 | The olive-oil polyphenol claim cannot simply migrate into olive pulp

EU Regulation (EC) No 1924/2006 governs nutrition and health claims. The authorised claim concerning olive-oil polyphenols and protection of blood lipids from oxidative stress is tied to olive oil and defined conditions, including a minimum amount of hydroxytyrosol and derivatives per 20 g of olive oil. It is not a blanket authorisation to claim cardiovascular protection for an olive-pulp powder or any food containing olive phenolics. [19,21]

The chemical identity of a measured phenolic, its quantity, the food matrix, the serving and the legally authorised wording must all align. Generic claims such as 'detoxifies', 'anti-inflammatory' or 'protects the heart' can create substantial regulatory risk when based only on DPPH, ABTS or other in-vitro antioxidant tests. A supplement classification does not provide an exemption from the claims regime.

A conservative label-development process separates factual composition statements, permitted nutrition claims and authorised health claims. The marketing department should not receive an unqualified 'clinically proven' assertion merely because a research paper reports antioxidant activity or a plausible mechanism.

13 | Spain: an opportunity for olive-producing regions, not a regulatory shortcut

Spain was the receiving Member State in the October Article 4 consultation. The publication therefore provides unusually direct relevance to Spanish ingredient manufacturers, contract processors and supplement brands. Nevertheless, Spain applies the EU general food-law, hygiene, novel-food and claims frameworks; national and autonomous-community authorities retain their respective control responsibilities. [1–4,17–21]

Where the product is marketed as a food supplement, Royal Decree 1487/2009 establishes Spanish requirements concerning composition, presentation, labelling and notification of placing on the market. The precise consolidated text and competent notification route should be checked for the operator's circumstances. A novel-food-status finding does not itself constitute a completed supplement notification, a food-business registration or approval of the label. [22]

The business opportunity is strongest where processors can demonstrate segregation of food-grade fruit fractions, controlled moisture, stable specifications and traceable origin. Conversely, an uncontrolled by-product stream should not be relabelled 'food grade' solely because a comparable ingredient was considered non-novel.

14 | European Union: the classification, safety and claims ledgers remain separate

For EU operators, the status ledger cites Regulation (EU) 2015/2283, Article 4, and the consultation procedure in Implementing Regulation (EU) 2018/456. The safety ledger cites general food law, hygiene, contaminants and pesticide rules. The communication ledger cites Regulation (EU) No 1169/2011 and the nutrition and health claims regime. A single Commission status entry cannot replace the other ledgers. [3,4,15–21]

A further complication is that national rules on the use of botanical substances in supplements may differ where the subject is not fully harmonised. The October statement mentions that olive fruit appears on positive lists in several Member States, not that every possible olive-derived preparation is uniformly permitted in every national supplement system. A cross-border launch should examine each destination and its notification or composition requirements.

Competent authorities may require documentary evidence of identity, process and intended use. The company should preserve the published consultation, compare its own manufacturing specification line by line and obtain specialist advice where changes create a credible novel-food question.

15 | Great Britain and Northern Ireland: no automatic portability

Great Britain has its own regulated-products arrangements for novel foods, with Food Standards Agency and Food Standards Scotland roles and a Great Britain authorisations register. Northern Ireland has distinct EU-linked food-law arrangements, subject to applicable movement schemes and other specific provisions. The October Commission/AESAN determination is useful technical evidence but is not automatically a formal British regulatory determination or an authorisation in any UK territory. [23]

A supplier should therefore distinguish a product genuinely non-novel under the relevant GB criteria from one requiring authorisation. It should also check food-supplement rules, contaminants, claims and the precise destination. The existence of a GB register of authorised novel foods does not mean that every ordinary non-novel ingredient must appear on that register.

For cross-border distribution, a shared scientific dossier can support multiple assessments, but each legal conclusion must name the jurisdiction, applicable instrument, competent authority, product description and status date. The phrase 'EU-approved olive fibre' is misleading if the only document available is a non-novel status consultation.

16 | United States: GRAS, dietary supplements and the 2026 proposal

US law approaches the same ingredient through different statutory pathways. A substance intentionally added to conventional food may require a food-additive authorisation unless its intended use is generally recognised as safe

(GRAS) or another exclusion applies. A dietary supplement ingredient may raise separate new dietary ingredient notification questions depending on its legal history and intended use. Neither pathway is satisfied merely by an EU non-novel finding. [24,25]

On 10 August 2026, the US Food and Drug Administration proposed changes intended to strengthen oversight and transparency of GRAS claims; the agency held an explanatory webinar on 15 October and sought comments through 9 December 2026. These are proposal-stage developments as of this article's date, not a final legal change. The October 2026 FDA final guidance on new dietary ingredient identity and safety information concerns a different regulatory route. [24,25]

A US market dossier should specify whether the powder is intended for conventional foods or supplements, what historical and toxicological evidence supports the exact intended use, and whether any food-contact or processing-related issues are relevant. US claims requirements must be evaluated independently from EU claims law.

17 | The economic paradox: drying can consume the circularity advantage

Converting a wet olive side stream into a shelf-stable powder may require substantial water removal. The commercial benefit depends on feedstock price, recovery of useful solids, equipment utilisation, drying energy, logistics, packaging, quality losses, wastewater and the achievable sales price. The environmental benefit likewise depends on the counterfactual fate of the biomass and on actual process energy and substitution effects. [8–11]

It is insufficient to declare that a product has a low carbon footprint because its raw material was once a by-product. Allocation choices in life-cycle assessment can materially affect the result, and the avoidance of one waste-treatment route may be offset by energy-intensive drying or long-distance transport. Conversely, integrated use of waste heat or wet processing may improve economics in particular installations; such outcomes must be measured, not assumed.

A practical pilot should report yield per tonne of wet feedstock, kWh per kilogram of saleable powder, wastewater and rejected-stream burdens, quality stability, packaging requirements and the functional amount displaced in the customer's formulation. The comparison should be made on a functional unit rather than a slogan.

18 | Existing research and patents rule out a facile novelty claim

The literature already documents *food-grade olive-pomace powders, olive-derived phenolic extracts, bakery fortification, drying optimisation* and *integrated biorefinery strategies*. Patent disclosures likewise predate October 2026. For example, EP4188119A1 describes an olive-derived dry powder, food ingredient and preparation process, while US20210076697A1 describes food compositions containing an olive-pomace-derived ingredient. These records show that neither olive-pomace valorisation nor a generic olive-fibre powder can responsibly be presented as newly invented by this article. [6–13,26,27]

The October decision is novel in its publication date and specificity as an official status record, not in the underlying existence of olive-pulp food technology. Patent publications are evidence of disclosed technical approaches, not proof that a given commercial product is effective, safe, unencumbered or patented in every jurisdiction.

Any future protectability or freedom-to-operate assessment must search claims, family members, prosecution history and current legal status in the relevant countries. A preliminary review of two illustrative patent families is not an exhaustive patent landscape.

19 | Supplier qualification: an auditable specification rather than a green certificate

A purchasing specification should identify botanical origin and fraction; the type of oil-extraction process; de-stoning and defatting methods; moisture and water activity; particle-size distribution; residual fat and oxidative stability; dietary fibre and relevant phenolic markers; microbial acceptance criteria; contaminant testing; packaging; shelf life; and traceability. It should also specify whether the supplied powder is intended only for supplements or for another assessed application.

The certificate of analysis must state analytical methods, limits of quantification, sampling plans and uncertainty where relevant. The supplier should commit to notification of changes in cultivar geography, harvesting season, extraction technology, heat exposure, solvent use, drying configuration or milling. Where processing is outsourced, the dossier should identify the actual manufacturing sites and their responsibilities.

A 'not novel' certificate copied from the Commission website is not evidence that a supplier's product matches the consulted material. An internal equivalence assessment, supported by analytical data and manufacturing records, is the minimum sensible basis for relying on the decision.

20 | Research & Innovation Opportunity

UNRESOLVED PROBLEM. Olive-pulp ingredient development often optimises chemical composition, microbial safety, sensory performance and energy consumption in separate experiments. The October 2026 status decision provides a sharply described regulatory reference point, but no generally validated industrial method shows how to maintain comparability to that reference while optimising the entire production chain across harvests and factories.

WHY IT MATTERS. A process change that improves phenolic recovery can alter composition and potentially regulatory status. A drying change that improves microbial stability can degrade flavour or phenolics and increase energy demand. A supplier that optimises only one outcome may create a commercially or legally inferior ingredient.

WHAT IS ESTABLISHED. Existing research supports the technical feasibility of olive-pomace powders and extracts, identifies useful compositional and technological properties, and demonstrates the sensitivity of drying and extraction to process conditions. The published patents show that generic olive-pomace food products and processing routes have substantial prior art. [6–13,26,27]

WHAT REMAINS UNKNOWN. There is insufficient cross-factory evidence on the predictive value of combined source, process and analytical fingerprints for maintaining a defined ingredient specification, controlling contaminants and delivering stable food functionality. The present article does not claim that a new patentable method has been discovered.

PROPOSED HYPOTHESIS. A source-to-product qualification ledger integrating botanical and process provenance, a targeted chemical fingerprint, validated microbial controls, process mass balance and application-specific performance will predict batch acceptability and change-related failures better than a single marker such as total phenolics or dietary fibre alone. This is a testable research hypothesis, not an established standard.

DEVELOPMENT PATHWAY. Recruit several olive mills using contrasting cultivars and two- or three-phase extraction; select food-grade pulp fractions; record de-stoning, defatting, drying and milling parameters; and create matched powder batches. Compare at least one supplement application and two food-formulation pilots only after assessing the intended-use status of each. Use validated methods for fibre, moisture, residual fat, oxidative stability, identified phenolics, microbiology and risk-selected contaminants. Record sensory and techno-functional results, yield and energy use.

KEY VALIDATION STEPS. Preregister specification limits and prediction metrics; replicate across harvests, suppliers and independent laboratories; blind model assessment on held-out batches; perform mass-balance closure; evaluate change-control false negatives; and compare the combined ledger against routine certificate-of-analysis screening. Analyse whether improved decisions justify the additional testing costs.

REGULATORY CONSTRAINTS. The research protocol cannot expand the scope of the 13 October consultation, waive ordinary food-safety requirements, authorise a novel extract or substantiate a health claim. Every application must be assessed under the correct jurisdictional instrument, and confidentiality measures should protect proprietary process information while preserving auditable evidence.

POTENTIAL INDUSTRIAL RELEVANCE. If validated, the framework could improve supplier qualification, contract manufacturing, ingredient standardisation, food-supplement development, waste-heat integration, export documentation and the economics of circular ingredient processing. These benefits remain prospective until tested.

21 | Practical implications for relevant markets

For ingredient manufacturers and distributors, the immediate opportunity is a technically disciplined product-development pathway for Mediterranean fibre-rich materials, not an assumption that all olive residues can enter food. This aligns with work on functional ingredients, botanical preparations, dry powders, processing technologies and supplier documentation.

A sensible first-stage feasibility assessment would compare available food-grade pulp streams, supplier processing capacity, anticipated supplement dosage, achievable specifications, customer demand and price positioning. The second stage would validate safety, stability and process economics. Only then should broader food applications or targeted extraction technologies be considered, each with a fresh status and claims assessment.

Commercial language should remain precise: 'derived from olive fruit', 'fibre content determined analytically', or 'assessed as non-novel for the specified consultation material' may be defensible in context. 'EU-approved therapeutic antioxidant', 'zero-risk waste-derived ingredient' and 'all olive extracts are non-novel' are not.

22 | Evidence status: five propositions kept apart

ESTABLISHED REGULATORY FACT. The 13 October 2026 consultation lists a specifically described defatted olive-fruit pulp powder intended for supplements as non-novel. This is not a universal market authorisation or health-claim approval. [1–4]

ESTABLISHED SCIENTIFIC EVIDENCE. Published studies show that olive-pomace fractions can contain fibre and phenolics and that processing conditions affect their composition and food performance. These findings are study- and matrix-specific. [6–13]

EMERGING EVIDENCE. Newer studies investigate wet extraction, alternative drying and formulation strategies. Their industrial generalisability, full life-cycle performance and reproducibility across supply chains remain uncertain. [8–13]

EXPERT INTERPRETATION. The most defensible industrial strategy is to treat regulatory status, product safety, intended-use functionality and environmental performance as linked but independently evidenced decisions.

HYPOTHESIS AND RESEARCH AGENDA. A source-to-product qualification ledger may improve the consistency and economics of upcycled olive ingredients. Prospective validation, interlaboratory comparability and actual cost-benefit analysis are necessary before claiming demonstrated superiority.

23 | Conclusions: the opportunity lies in precision, not rebranding

The October 2026 olive-pulp consultation is a useful development for Mediterranean food innovation because it recognises that a defined, conventionally processed fruit powder need not be treated as a novel food. Its value is greatest when the decision is read precisely: the material, process and intended use are described, and the conclusion is about novel-food status and not a universal guarantee of safety, efficacy or market access.

A commercially credible programme must connect food-grade source selection, process control, validated microbiology, chemical specifications, intended dietary exposure, lawful claims and realistic environmental accounting. The science already supports promising avenues for olive-pulp valorisation; the research challenge is to make them reproducible, legally defensible and economically worthwhile.

A non-novel ingredient is not a blank cheque. It is an invitation to do the ordinary, and often demanding work of proving that the actual ingredient is safe, useful and correctly represented.

Related INTABIOTECH Knowledge Areas

Functional Ingredients | Food Safety | Regulatory Affairs | Processing Technologies | Biotechnology | Sustainability | Emerging Research

Editorial Scope & Evidence Limitations

This independent academic–industrial analysis reflects sources available through 28 October 2026. The 13 October status record concerns the specifically described material and intended use; it is not an EFSA toxicological opinion, a general EU authorisation, a product-specific legal determination or a health-claim approval. Hypothetical calculations are labelled as such. The research programme is proposed for testing, not presented as validated or patentably novel. Illustrative patent references do not constitute a freedom-to-operate opinion. No claim is made that any specific INTABIOTECH product processes or decontaminates olive pulp.

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