

Professor John Beddington CMG FRS
Chief Scientific Advisor to HM Government
Government Office for Science
Kingsgate House
London
SW1E 6SW

26 August 2009

Dear Professor Beddington

Science Review of the Food Standards Agency

The Agency welcomes the report by Government Office for Science Review of Science in the Food Standards Agency published in April 2009 which presents positive and practical recommendations as to how the Agency can strengthen its use and management of science. I have attached to this letter the Agency's formal response to the Review's recommendations. The Agency accepts most of the report's recommendations which are fair and constructive. The Agency acknowledges that improvements can be made in response to many of the recommendations. In most cases, work to implement them is already underway and is complete in 4 cases. In preparing this response the Board has taken into account the views of: the General Advisory Committee on Science (GACS), the Secretariats of the Scientific Advisory Committees (SAC), the Food Advisory Committees, Agency staff and the Industry and Consumer Stakeholder Groups.

We are pleased that the review recognised the many areas of good practice in science and scientific expertise in the Agency. We would like to thank the Government Office for Science, the Steering Panel and assessors for their hard work in producing this report.

Yours sincerely



Dr Andrew Wadge
Chief Scientist and Director of Food Safety

**GOVERNMENT OFFICE FOR SCIENCE'S REVIEW – FOOD STANDARDS AGENCY
APRIL 2009. FOOD STANDARDS AGENCY RESPONSE**

General Comments

We welcome this review of the management, quality and use of science in the Agency. We thank the Government Office for Science, the Steering Panel and assessors for their hard work in producing the report, which is fair and constructive.

“As an evidence based organisation making extensive use of scientists, the Agency in many respects is already operating to the high standards looked for in the Science Reviews. The Review findings indicate that the FSA’s approach to the use of science has generally been impressive. It is important that this is maintained and enhanced going forward.”

From its establishment, the Agency has had science at the centre of policy formulation and advice to stakeholders. Therefore, we are pleased that the review has recognised our current good practice

- openness and dialogue with its stakeholders
- initiation of a wide range of horizon scanning activities
- development of a prioritisation tool to inform research decisions
- publication of research requirements for new proposals and good management of research
- measures put in place to strengthen science governance, including the establishment of a General Advisory Committee on Science
- effective and innovative dissemination of its work
- use of risk assessment advice from a large number of experts on the Scientific Advisory Committees
- staff drawn from a wide range of scientific disciplines, who are encouraged to participate in continuing professional development, and have integrated science and policy responsibilities.

We nonetheless agree that further improvements can be made. The review took 16 months to complete and during that time we continued to develop our science capability. This applies particularly to the area of social science where the Social Science Research Unit and Social Science Research Committee had just been set up as the Review began. We have taken the opportunity to highlight recent such progress as part of our response.

Response to the Recommendations

1. Develop a clear overall science and/or research strategy

Recommendation 1 (Medium)

The next version of the FSA Science Strategy should show clear linkages between the achievement of the Agency's strategic outcomes and local authority inspection activity.

The Agency is implementing Recommendation 1.

We agree that the partnership with local authorities is of paramount importance to the delivery of the Agency's strategic objectives, but the link with the Agency's science has not always been clear. We also note that the Hampton Review obliges us to make enforcement on businesses more efficient. Both of these drivers have been recognised with the creation of an Implementation and Delivery Division in the recent restructuring of the Food Safety Group. This Division will further strengthen links between the Agency and local authorities.

We will need to consider which aspects are best dealt with in the Science and Evidence Strategy and which are better addressed at a core level in the new FSA Strategic Plan.

Recommendation 2 (Medium/Low)

The Agency should clearly and openly set out its reasoning behind the numerical targets it sets (in the Strategic Plan).

The Agency has implemented Recommendation 2

The Agency is currently developing a new Strategic Plan for 2010-15. The consultation package contains a clear exposition of the evidence underpinning the high level aims¹. Work to develop targets to achieve these aims will be carried out in the second half of 2009. We will continue to set out our reasoning, which will be presented to the FSA Board in open session to discuss and agree before the Strategic Plan is finalised.

Recommendation 3 (High)

The FSA should put in place measures to afford greater transparency to external stakeholders as to how priority areas for research are identified and funded.

The Agency is implementing Recommendation 3

The Agency began to develop its new Science and Evidence (S&E) Strategy at the beginning of 2009, alongside the new Strategic Plan (rather than after the SP has been agreed, as was the case with the Science Strategy 2005-2010). This parallel process makes

¹ <http://www.food.gov.uk/consultations/ukwideconsults/2009/proposedfsastrategy20102015>

it much easier to see how the new evidence relates to the strategic priorities, and to see which relate to research and which to other forms of evidence-gathering. Importantly, it also allows the discussion on science and evidence to inform the strategic priorities as well as flowing from them.

In addition to the written consultation³, we have held two workshops for external stakeholders. An initial workshop in February sought views on *how* the Agency should develop and conduct its science; a second in May looked at *what* science should be funded and gave preliminary views on priorities. This information, along with the outputs from the formal consultation, the nutrition portfolio review and advice from the General Advisory Committee on Science will form the basis of the next S&E Strategy.

A thorough, external review of our nutrition research programmes has also been carried out during the first half of 2009 (and will feed into the new S&E strategy). Identification of priorities was an integral part of this work and we expect to use the process as a model for reviews of other key policy areas.

In autumn 2009, we will undertake a detailed prioritisation exercise (using the tool previously developed and thereafter being undertaken as an annual exercise) drawing on the emerging future priorities. We do not plan to involve external stakeholders in this process. However, GACS has a role in challenging the prioritisation process and the balance and priorities of the outcome at a strategic level. We anticipate that a member of GACS *will* be part of the process and will report back to an open session of GACS in Spring 2010. An important part of the member's role will be to make sure that the reasons for the assigned priorities are clearly stated so that they can be set out in the new S&E Strategy.

The Agency's overall programme of research will be re-aligned in the light of the new S&E strategy and the reviews of policy areas during 2010 in the light of all of these activities.

For the future, following the annual prioritisation, the Agency intends to publish a list of areas of interest for the coming year. This will set out the areas of work for which we will be tendering over the next financial year, giving us the opportunity to set out areas where we do not yet have firm ideas - seeking stakeholders' comments and also enabling people already working in the areas to express an interest in working with us.

Recommendation 4 (High)

The Review strongly recommends that, even in a period of declining resources, the amount of funds devoted to high quality scientific research related to the work of the Agency should not fall, nor should standards for funding be lowered.

The Agency accepts the intention behind the first part of Recommendation 4 though we cannot commit to maintaining current spending levels. We agree that standards should not be lowered

The Agency's reputation as an organisation based on science and evidence depends on having a credible programme for gathering the information we need. Commissioning research is one means of achieving this and the Agency has a strong track record here. Our spend on research and surveillance has been of the order of £20 million for the past few

years. This is around 14% of our total budget (or 19% if MHS costs are excluded), which puts us above most other Government departments on this measure.

As we explain in the Science Strategy 2005-2010, the Agency's Board agreed that it would not be appropriate for the Agency to ring-fence specific components of its budget as it needs to retain the flexibility to allocate the resources it has available in the most effective way to support its strategic objectives and respond to external developments.

We explain elsewhere in this response that we will be undertaking a major piece of work to ensure that we are getting value for money from the science we commission. We will also be using the outcome of the prioritisation process to ensure that the work we commission is essential to our strategic aims. The Agency is increasingly working with other funders (both in the UK and internationally) to co-fund work, so that we maximise the impact of our spend. Taken together, these initiatives may mean that in future we spend less money to obtain the same (or greater) benefit. We see this as a valid aim.

We already have ways to ensure that we fund high quality work, for example, the Joint Code of Practice on Research. However, we are changing our research commissioning process to ensure a greater degree of challenge at the stage of development of funding proposals. The aim is to ensure that we are asking the right question and have an understanding of the best ways to go about answering it. We will also be ensuring proper external challenge to project proposals (see Recommendations 11 and 12).

Recommendation 5 (High)

The Agency should in its next science strategy:

a) incorporate social science strategy as an integral part of the Agency's longer term direction and purpose; and

b) provide greater clarity to its policy on managing the integration of natural and social science research in policy formulation.

The Agency has already started to implement Recommendation 5

When the Science Strategy 2005-2010 was written (2005), the Agency had identified the need for an internal and external social science capability. The Social Science Research Unit (SSRU) began its work in summer 2007 with the appointment of a Head of Social Science Research and the central Unit is now eight strong and providing support across the Agency. Its establishment signalled the Agency's intention that social science should be an integral part of our overall strategy. The Social Science Research Committee (SSRC) was set up and began work in 2008. Both the SSRU and the SSRC provide a route through which social science inputs into the Agency's strategic direction.

At its first meeting, the SSRC approved a high level strategy for developing and embedding social science in the Agency² which we fully intend to incorporate in our Science and Evidence Strategy 2010-2015. Furthermore, the new S&E Strategy will set out our specific social science needs and they will be incorporated into future prioritisations along with other potential work areas.

² See <http://www.food.gov.uk/multimedia/pdfs/committee/ssrcstrat.pdf>

We have used the Chief Scientist Annual Reports to show how our new social science expertise is being used, both in terms of augmenting the evidence base and its role in policy formulation.

2. Horizon Scanning – to identify future science-related issues

Recommendation 6 (High/Medium)

a) The Horizon Scanning (HS) Unit should be strengthened to improve the Agency's horizon scanning capacity and capability.

b) The Unit should be used to promote and deliver greater central coordination of horizon scanning within the Agency; and shared understanding and engagement with stakeholders.

The Agency notes Recommendation 6 and is implementing other actions to achieve the same outcomes

We have considered Recommendation 6 carefully. We are aware that horizon scanning can be a resource-hungry and time-consuming activity however it is a priority for the Agency. Our aim has been to identify a mechanism which provides the information we need with a minimum of resource.

The General Advisory Committee on Science advises the Agency on its scientific horizon scanning activities – both in identifying key strategic issues arising from horizon scanning in the Agency and in advising how horizon scanning can be improved. It has recommended that:

- GACS should focus on where it can add value:
 - collating and prioritising (science) issues arising from the work of the scientific advisory committees and elsewhere,
 - identifying crosscutting issues that may need a co-ordinated approach, and feeding this back to the SACs and more widely, including into Agency strategic planning
 - considering which approaches work
 - developing and monitoring good practice
 - looking at what happens as a result of horizon scanning.
- There is merit in considering the past horizon. The Agency should revisit regulations and policies when new information on risks emerges, and make more use of existing data and of historical evidence.
- It may be a more useful approach to concentrate on putting in place a process which could be adapted to the actual circumstances which arise rather than putting too much effort into identifying specific risks which then do not occur.

The Agency is making positive steps to improve our horizon scanning capacity. The following actions have been identified and are being implemented:

- A major piece of futures work was carried out by the Agency's Strategy Team and Operational Research Team to support development of the new Strategic Plan.
- A cross-cutting network has been developed to strengthen the links between existing areas of futures work in the Agency. It is co-ordinated by the Chief Scientist Team and provides periodic reports to GACS. It covers activities carried out by the Agency's Strategy Team, the scientific advisory committees and policy divisions.
- Ensuring capacity to carry out horizon scanning activities has been one of the underpinning criteria for the re-structuring of the Food Safety Group.
- The Incidents Prevention Strategy (which includes ways of identifying emerging risks and follows on from the Workshop on Food Incident Prevention and Horizon Scanning mentioned by GO-Science) is being reviewed and re-focused. Its primary outcome will be better foresight of potential food safety problems, feeding into prevention and thus resulting in a reduction in number and impact of incidents.
- Liaison between the scientific advisory committees is being strengthened. For example, GACS hosted an horizon scanning workshop in June 2009.
- The periodic report to GACS on the Agency's horizon scanning activities will show the extent of Horizon scanning carried out by Agency as distinct from that of the scientific advisory committees.
- GACS has asked the Agency to set out how it uses intelligence from horizon scanning and what impact it has on the Agency's work. We will include this in the Chief Scientist Annual Report 2009/10.
- We are considering whether to buy into other organisations' intelligence gathering schemes as a means of updating the periodic futures work carried out in the Agency.

3. Review and harness existing research and identify gaps and opportunities for future research

Recommendation 7 (High/Medium)

The FSA should ensure that routine post-programme evaluation:

- a) assesses the degree to which research commissioned by the Agency is used to support policy development and implementation;**
- b) where appropriate, ascertains whether value for money considerations have been met; and,**
- c) considers the scientific evidence base to ensure that the best current and emerging new evidence continues to be reflected in policy development and implementation.**

The Agency is implementing Recommendation 7

The Agency commissions research and surveillance to support its strategic objectives and policy development. Our current system of research management contains an element of evaluation, both for individual projects and for programmes. Mid-term programme reviews (few post-programme evaluations have been carried out) do involve a rigorous assessment of the extent to which the research has been use to support policy. However, the General

Advisory Committee on Science has already identified that we should do more to bring these data together, learn from them and disseminate this information to stakeholders. In its discussion about performance indicators³, GACS identified a performance indicator to focus on how the science has been applied and its effect. This is being implemented. The Agency is carrying out a project to improve its approach to evaluation in general. Lessons from this will be applied to research and surveillance.

Value for money is considered at several points during the current commissioning and management process:

- assessing proposals;
- assessing project reports; and
- as part of programme reviews.

An audit looking at (amongst other things) research has been included in the 2009/10 programme of internal audits. We will look further at what measures might be used⁴.

The Agency's Science Checklist⁵ and Good Practice Guidelines⁶ make it clear that the Agency expects its scientific staff and its scientific advisory committees to seek out the most up-to-date information and to keep in mind the need to re-visit advice in the light of scientific developments. This is facilitated by horizon scanning activities and also through the Chief Scientist's efforts to promote continuous professional development.

A suggestion in the text is that GACS should review the research prioritisation tool within a year for fitness for purpose. Evaluation of the research prioritisation tool is in the programme of work for GACS. However we would question whether one year is sufficient time for the tool to demonstrate its effectiveness, and consider that at least a two year period is needed.

4. Commission and manage new research

Recommendation 8 (High/Medium)

The FSA should make greater use of Formal Systematic Reviews and meta-analysis to derive maximum benefit from the available evidence base in areas of key policy decisions

The Agency notes Recommendation 8.

We understand 'Formal Systematic Review' to be the approach used by the Cochrane Centre⁷ when there is a full dataset. We agree that under those circumstances this approach is desirable. However, in practice – in the area of food – the nature of the available dataset generally does not allow such a systematic approach. Therefore, the Agency's usual

³ www.food.gov.uk/multimedia/pdfs/gacs2performanceindicators.pdf

⁴ One measure could be to compare the value for money at the proposal stage when a new project is appraised, and the value for money when the final report is evaluated. This will indicate whether contractors have achieved what they set out to achieve at the cost, which was indicated when the project was assessed or commissioned. Another measure is in the value that the results of the project have added to addressing Agency aims and objectives and the impact on progress in dealing with the issues targeted.

⁵ <http://www.food.gov.uk/multimedia/pdfs/sciencechecklist>

⁶ <http://www.food.gov.uk/multimedia/pdfs/goodpracguide.pdf>

⁷ www.cochrane.co.uk

approach is to carry out a review of available data and submit the outcome to a scientific advisory committee for peer-review and advice. The Agency considers it essential to use all the evidence available, and this is reflected in the emphasis we put on carrying out literature reviews.

Recommendation 9 (High/Medium)

The Agency should exercise greater transparency in

a) its use of social and economic analysis to inform policy;

b) the procurement route it adopts for commissioning social science research; and

c) improve communication with external stakeholders including those bidding for Agency research and/or seeking to work collaboratively with the Agency.

The Agency is implementing Recommendation 9

The Social Science Research Committee (SSRC) is advising how social science can best contribute to meeting the Agency's strategic plan and policy objectives. As one of the scientific advisory committees, the minutes of the SSRC are available publicly and meetings are open.

The Agency's Board makes its policy decisions in open meetings and the papers make it clear what social and economic analysis is being used to underpin those decisions.

Historically consumer studies were procured through a memorandum of understanding with the Central Office of Information. However, we recognise that social science is far wider than consumer research and the Social Science Research Unit has been working closely with our Procurement and Contracts Team to introduce new procedures so that our social science research is treated in the same way as our scientific research and is compliant with EU legislation and the Office of Government Commerce guidelines. In the future social science research will be procured through a combination of collaborations with research funders such as the Economic and Social Research Council (see food.gov.uk/news/newsarchive/2009/jan/esrc), our own research Frameworks (see food.gov.uk/news/newsarchive/2009/mar/socalsciencetenderopp), other government department Frameworks (including COI), limited tender exercises and informal competition. As soon as we have finalised our approach to procuring social science research we will put details on our website and alert the research community.

The proposal to move to a system of publishing each autumn a list of areas for research for the coming year (see Recommendation 2) will improve communication with those bidding for work and those who wish to work collaboratively.

Recommendation 10 (High/Medium)

The Agency should set targets for:

a) a higher level of broader and longer term strategic research than is current; and

b) the level of joint research and knowledge transfer activities; and outline

The Agency will not implement Recommendation 10

We fully accept the need for, and desirability of, undertaking strategic research and joint research activities. We agree that the current Science Strategy did not put enough emphasis on the former. However, the Agency does not see the value in setting targets as outlined in Recommendation 10.

The Agency has always used science to achieve its strategic objectives, and has not commissioned work unless it is aimed at doing this. Our horizon scanning exercises and the new 5 year Science and Evidence Strategy will examine our future needs in terms of research, evidence gathering and other scientific studies that give the framework for specific work to be planned and commissioned. We will look at the level of longer term research when drawing up the strategy, but there will always be a balance to be struck between longer term work and more immediate work identified in policy development and implementation. We believe the needs should determine the balance, not an artificial requirement to set a target.

GACS also felt that the idea of adopting numerical targets or 'up front' quotas for different types of work could mean that the delivery of high quality cost effective work would be undermined. It felt that the Agency should consider further the balance between innovative, long-term strategic and directed, applied science but in doing so should look at the balance regularly and make changes as needed not set artificial targets at the start.

The Agency already explores the possibilities of jointly funding research to with other Research Council funders and we set out the fruits of these efforts in the Chief Scientist Annual Report. The Agency also has strong links with European-funded collaborative research, recognising that a European approach is needed for many of the food issues to be resolved, and is often extremely good value for money.

In future there will be a central fund to use for cross-cutting research and to give us more flexibility to jointly fund research.

Recommendation 11 (Medium/Low)

The dual role of the Agency’s Chief Scientist should be more explicit to the Agency’s stakeholders, particularly in the context of the commissioning of research.

The Agency notes Recommendation 11

The review suggests that there is a *theoretical* risk of a conflict of interest in the fact that the present Chief Scientist, who is responsible to the Board for the use of science and evidence, is also Director of the Food Safety Group, which commissions a large proportion of the Agency’s science. It did not find examples of this actually happening. We think that the checks and balances described in the Review⁸ do work. In addition, the steps we will take to increase transparency in prioritisation of research (Recommendations 1 and 3) will make it clear to stakeholders that science is being commissioned according to the overall needs of the Agency.

5. Ensuring quality and relevance of work carried out and sponsored

Recommendation 12 (High)

The Agency should:

a) institute a more rigorous (independent and external) approach to peer review at all stages of commissioning and evaluation of research;

b) ensure procedures are in place to maintain and enhance effective project management capability

The Agency is implementing Recommendation 12

This recommendation is related to 11 above. Current research commissioning guidelines make clear the need for independent external assessors of proposals. We agree that the Agency’s science and evidence should be subject to peer review (at both the design and reporting phases) and that we should apply a consistent approach across all of our work. We agree that there should be at least two external and independent assessors for significant pieces of work. However, we think we should adopt a pragmatic approach to determine when internal peer review and/or one external assessor will be sufficient and we will develop criteria to set out clearly when this is the route to be followed. We have recently set up a Register of Social Science Experts whom we can call on for peer review activities of our social science research in the future.

We note that the Peer Reviews of Projects carried out by the Steering Panel found that peer review did not happen in all cases.

We will revise the existing guidelines and make it clear which aspects are mandatory. This requirement will be reinforced by putting the requirements on the Agency’s ‘Rules and Tools’

⁸ Page 47 of the “Science Review: Food Standards Agency”

section of the intranet, thus emphasising that failure to comply may result in disciplinary action. This will dovetail with the current review of the Agency's procurement procedures.

Compliance will be checked by regular internal audits.

Effective project and programme management is achieved through internal Project Officers and Programme Managers, and external Programme Advisors. The latter are appointed for their knowledge of the research area. The Agency will be reviewing the effectiveness of the current system and will be clarifying what is expected in each of the roles. We acknowledge that Project Officers and Programme Managers will usually have other duties, and may therefore have conflicting pressures. Through the review of the system itself and the duties of the various players, we aim to identify the critical points of project and programme management and make sure that line managers allow enough time for these to be carried out.

6. Use of research and scientific advice, e.g. in formulating policy

Recommendation 13 (High/Medium)

The Agency should build on its science governance, in particular, by strengthening the underpinning internal checks and balances ensuring uniformity in adherence across the organisation.

The Agency is implementing Recommendation 13

Science undertaken in the Agency is scrutinised to ensure it is consistent and of the highest quality:

- GACS has overall responsibility to challenge SACs and the Chief Scientist on issues of general science, and governance in the Agency.
- There is a Science Checklist for Board members to use to ensure when they receive scientific information that it has been gathered by the correct process.
- The SACs work to Good Practice Guidelines which set out detailed advice on the operation of the committees.
- Our social science research must comply with the Government Social Research professional code⁹

In March 2009, the paper presented to the Board on nutrient profiling included a summary of how the work undertaken complied with the requirements of the Science Checklist. This will be mandatory for Board papers in future.

For the future, the Chief Scientist Team will work with the Internal Audit Unit to ensure that where problems are encountered either with research projects or other scientific studies, that effective remedial action is taken to improve the situation.

⁹ http://www.gsr.gov.uk/professional_guidance/gsr_code/index.asp

Recommendation 14 (High/Medium)

The Agency should do more work to make the functional separation of risk assessment and risk management more transparent.

The Agency has implemented recommendation 14

The responsibility for risk assessment lies with in-house scientific staff and the Scientific Advisory Committees. The Agency has established a set of criteria to decide which issues are sent to SACs and which are dealt with internally. We seek the opinion of a SAC when:

- The opinion underpins a major policy decision.
- Information suggests that there may be a risk to health but that information has not been peer reviewed.
- We need an expert view on where the balance of the evidence lies.
- The area of science is still developing and the level of uncertainty is significant.

These have been published and are available on our website (Chief Scientist Annual Report 2006/7 pages 72-73).

The Science Checklist clearly sets out that SACs have a very limited and clearly defined role in risk management:

“Would it be helpful to have the advisory committee’s view on whether (any of) the risk management options are consistent with the risk assessment?”

The Chairs of the SACs have also discussed this point at meetings of the General Advisory Committee on Science¹⁰. In addition, the Chairs had noted that observers at open SAC meetings are not clear about the risk assessment/risk management separation.

There is a clear separation between the process of risk assessment and risk management. The Scientific Advisory Committees are responsible for risk assessment – they consider the scientific evidence and reach an opinion on the implications for people’s health.

The risk management process brings in a much wider range of evidence. For example, regulatory constraints, economic and social consequences and consumers’ appetite for risk are all factored in. Responsibility for the risk management lies with the Agency. Although there is a separation of the risk assessment and risk management functions, it is critical that there is effective dialogue between those involved in the two processes. Agency scientists attend the scientific advisory committee meetings so that they can understand how the risk assessment conclusions were reached and consider the implications for risk management. They are the appropriate people to answer questions about risk management at open committee meetings.

Furthermore, it is now standard practice for the Chairs of the relevant SAC to attend the open meeting of the Agency’s Board where they can present the findings of their committee and explain the nature of the scientific evidence, including its strengths, uncertainties and

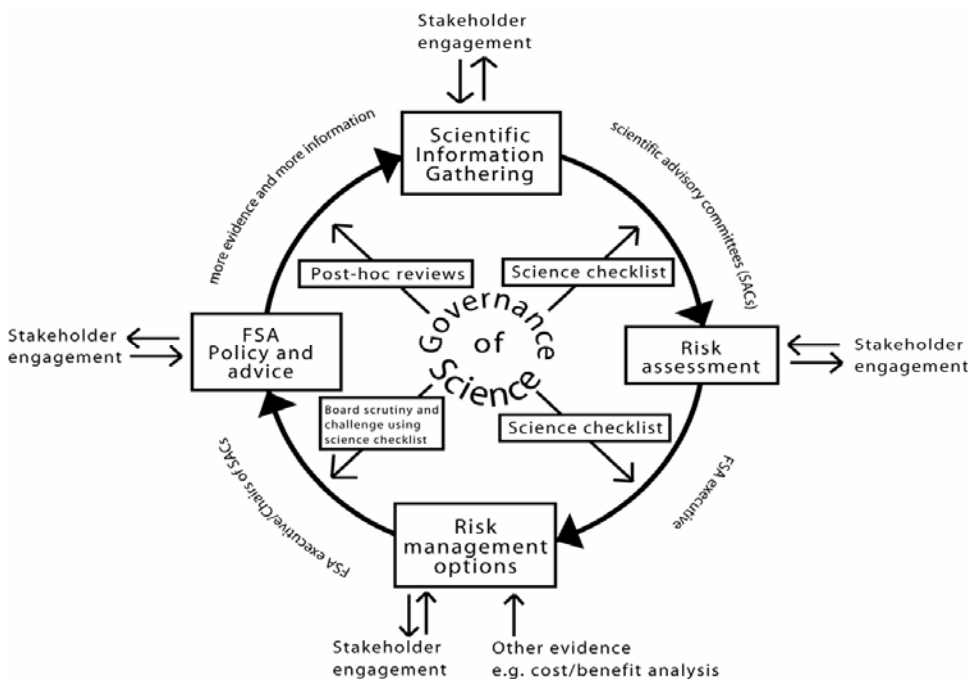
¹⁰ para. 36 of the minutes of the 2nd meeting

www.food.gov.uk/multimedia/pdfs/committee/gacsminds/draft29oct08.pdf

weaknesses. In this way, risk management decisions taken by the Agency's Board are fully informed and guided by the best available scientific evidence.

This explanation has been included in the Chief Scientist Annual Report 2008/09.

Key risk management decisions are made by the Agency's Board in open session. This enables stakeholders to judge for themselves how the risk assessment underpins the risk management decisions and to see what other evidence is taken into account in reaching those decisions. The process is described by the following diagram:



Day-to-day risk management decisions are taken by the Executive.

We have been careful to ensure that boundaries are not blurred by the people serving both on committees which carry out risk assessment (the SACs) and those which deal with risk management (the Board and the Scotland, Wales and Northern Ireland Food Advisory Committees)¹¹.

Nonetheless, the Agency accepts that the boundary between risk assessment and risk management is not always clear in the work of the SACs. We have reminded the Secretariats of the SACs of the need to alert their Chairs when the committee is venturing into areas outside their remit. Guidance on the issue of risk assessment/management separation will be included in the induction of new Chairs. We have also decided to ask GACS, given that the committee agrees how the separation works *in principle*, to look more closely at how to observe the separation in practice. This dovetails with GACS' wish to look at the risk assessment-risk management process through a number of case studies.

¹¹ www.food.gov.uk/multimedia/pdfs/board/int070805.pdf

Recommendation 15 (High)

The Agency should put in place a formal process for describing how its stakeholders, including the public, should be consulted on the framing of questions to scientific advisory committees

The Agency is implementing Recommendation 15

This recommendation arose out of a joint workshop with the Royal Society in 2005 (Social science insights for risk assessment)¹². The workshop concluded that the Agency should give clearer guidance on consultation with stakeholders and the public on the framing of questions for the Scientific Advisory Committees.

We have had an initial discussion with the Advisory Committee on Consumer Engagement (ACCE). Our initial view is that we should redefine the issue to one of: “How can the Agency use engagement to scope issues and identify the different streams of information and analysis it needs – including research and from SACs?” The engagement is thus more to inform the risk assessment framework (set by the risk managers in consultation with stakeholders) not the risk assessment itself. We are following this up with the ACCE and GACS.

7. Publish results and debate their findings and implications openly

8. Share, transfer and manage knowledge

There were no recommendations for these criteria.

9. Implement Guidelines 2005 and the Code of Practice for Scientific Advisory Committees

There were no formal recommendations for this criterion. However, we wish to respond to the assertions recorded in para. 9.4 of the report that “*there is inconsistency across some of the committees, not only in the process for selecting committee members but also in the conduct of the meetings, and that there are concerns about conflict of interest and membership of some committees not being representative of the spread of interest*”.

The Chief Scientist Team works with the Secretariats of the SACs to identify where practice between committees differs and to consider where consistency is necessary. For example, we have actively monitored the approach to openness adopted by the committees¹³. Only the Advisory Committee on Novel Foods and Processes does not routinely hold its meetings in open session. This is due to constraints which arise from the legislative framework within which it operates. Currently, we are introducing a consistent approach to assessment of the performance of committee chairs. However, these are independent committees and it is not our intention to demand uniformity of approach where this does not have a demonstrable benefit.

¹² www.royalsoc.ac.uk/downloaddoc.asp?id=2797

¹³ July 2007 board paper (www.food.gov.uk/multimedia/pdfs/fsa070708.pdf) and the Chief Scientist’s Monitoring and Evaluation Report on the SACs as discussed at GACS October 2008
www.food.gov.uk/multimedia/pdfs/committee/gacsminsdraft29oct08.pdf

All members of SACs are recruited under Nolan rules, in accordance with OCPA guidance and the requirements of the Code of Practice of Scientific Advisory Committees. The Chief Scientist has oversight of this process. He can challenge the overall spread of expertise of the committees and he makes sure that the appointments process has been followed fairly. Members are required to declare their financial interests on appointment, and also they have to declare any interests when speaking on specific issues. We must emphasise that people are appointed to SACs for their expertise in specialist areas not because they represent a particular interest. We carry out stakeholder consultation (see the diagram above) (for example on draft SAC opinions) to allow interest groups to input if they wish.

10. Use, maintain and develop scientific expertise (including both capacity and capability building)

Recommendation 16 (Medium)

The Agency should provide more opportunities for formal secondments and two way exchanges.

The Agency is implementing Recommendation 16

We agree that formal secondments are one way for Agency scientists to learn about new developments and how other scientific organisations work. The introduction of Continuing Professional Development gives the opportunity of exchanges both for Agency scientists to work in external food companies and laboratories, and external professionals to have short term secondments to the Agency. Other exchanges have also been arranged through the “World Class Regulator” scheme, which again covers all staff in the Agency and gives them an opportunity to learn about the effects of the Agency’s policies and regulations on the food sector at first hand.

There was a suggestion in the body of the text that the Agency should put a system in place to safeguard centres of excellence, which provide niche services. The Agency recognises that, through research and evidence funding, it has nurtured centres of excellence, which it highly values. Whilst it is desirable to make sure these centres of excellence remain so, there is no ring-fenced funding to do this. The Agency will continue to use such centres where the work is achieving objectives and has been procured correctly.

However, there are other ways in which the Agency can build and maintain its base of expertise. We currently run a Post-Graduate Scholarship Scheme, aimed at training post-graduates in areas of strategic interest to the Agency. We will be reviewing the effectiveness of the scheme during 2009 to see whether there are other ways we could deliver this benefit.