

THE FOOD STANDARDS AGENCY'S APPROACH TO RISK

1. Introduction

1.1. The main objective of the Food Standards Agency is

“...to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food.”

A great deal of our work depends on understanding and dealing with risk. In this statement we describe how the Agency proposes to approach risk issues, so that everybody who may be affected by our decisions can understand our way of working.

1.2. Everybody is faced with risks of one sort or another in their daily lives. They make up their own minds on how they choose to handle them. They make simple individual choices like when to cross the road and whether to make a journey.

1.3. The Food Standards Agency will deal with many different issues related to food, but we will aim to apply the following principles across all our work:

- **We will take a precautionary approach** - that is, we will not always wait until we have proof of a potential hazard to take action or issue advice. Such action will be taken on the best available evidence to protect public health. It will be reviewed if new evidence becomes available.
- **We will make decisions and take action in proportion to our best judgement of the risks.** Our recommendations will take account of the nature and extent of the risks involved and of the costs and benefits of proposed actions.
- **We will act quickly when we need to.**
- **We aim to be consistent in our approach** – we will try to be systematic in the way we tackle different issues.

- **We aim to give everyone the information they need** to make choices for themselves
- **We aim to meet the needs and concerns of consumers.** However, we will consult with all those who are or could be affected by our decisions.
- **We aim to learn from the experience of others,** both in this country and abroad, and from the theoretical work which has been published on risk and how to deal with it.

2. When a potential problem appears

2.1. We may become aware of an issue in a variety of ways. An enforcement officer, a retailer, a member of the public, or a food manufacturer may inform us of a potential risk. We may also be informed of emerging problems on farms. We may also discover a potential problem through one of our scientific surveys or studies.

2.2. We will assess the risk, taking account of the best scientific advice we can obtain. We will then decide what should be done, if anything, in consultation with those who are or could be affected.

2.3. We will inform the public as early as possible after the issue arises. We will always aim to explain clearly and in plain language what the issues are, what our opinion is, and what we propose to do. We will also explain whether there is any action which the public needs to consider.

3. Assessing the risk

3.1. When there are concerns that a particular food or process may be harmful, we have to consider first whether there really is a risk. If there is, we need to work out how serious it is. Risk assessment means finding out the answers to three key questions:

- “what is the harm that might be caused?”
- “how likely is it?”
- “are particular groups of the population more at risk than others?”

Assessing the risk usually needs detailed scientific analysis.

3.2. One of our Guiding Principles, published by the Government, is that our assessments of food standards and food safety

“... will be unbiased and based on the best available scientific advice, provided by experts invited in their own right to give independent advice.”

Our standard approach to risk assessment will be to seek the advice of experts, generally working in specialist independent Advisory Committees. All these committees include representatives of consumers as well as scientists.

3.3. We expect these committees to work openly, so that anyone who is interested can see what they are doing and how they do it. Committee papers, agendas and minutes will be published on the Agency’s website (www.food.gov.uk). Paper copies will be available on request. The committees will consider all the relevant available scientific information from around the world, including advice from other national and international expert groups. When our advisors assess such information, we expect them to seek the views of other experts. We fully support the conclusions of the review, led by the Chief Scientific Adviser, Sir Robert May, of risk procedures used by the Government’s Advisory Committees dealing with food safety. We expect our Advisory Committees to act in accordance with those conclusions.

3.4. In an emergency, or if something unexpected comes up, we may not be able to get the advice of a whole committee. We will always try to get some independent expert advice if the issue carries a serious risk and is not straightforward. Routine decisions which do not need to be referred to expert groups may be taken on the advice of our own scientists.

4. When the risks are not clear

4.1. When risks are unclear, our job is more difficult. The first question that scientists doing risk assessments try to answer is “how dangerous is it?”. Sometimes they can calculate an answer in the form of a number (such as “one in a million chance”). Very often, the scientific information is less precise, and they cannot give that kind of answer. Experts usually deal with this by applying safety factors: that is, estimates which err on the side of caution. Often they can only say that (for example) human consumers face very little risk, as long as they eat

less than a certain amount.

- 4.2 On most known issues, our advisors can use established scientific knowledge as the basis of their risk assessment. We will of course aim to keep our scientific knowledge up-to-date.
- 4.3 In most areas of science (not just food safety), experts can develop different ideas about some problems. This may affect their view on the level of risk. This debate between experts usually leads to new research.
- 4.4 If the problem we face is a new one, we are less likely to know what the risks are. In dealing with such problems, it may be difficult to decide what action to take until new research has been done. Sometimes it may be best to wait until we know the outcome of the new research. However, we may not be able to wait that long, especially if there could be a serious health risk. In these cases we will ask our independent committees or other advisors to weigh all the evidence carefully. We will ask them to tell us how much uncertainty there is and what their concerns are, and to give us their best advice.
- 4.5 When the risk is uncertain, we will take a precautionary approach. If there is good reason to believe that there could be a serious risk to public health, we will take appropriate action, in proportion to the risk, the consequences of the proposed action, and the level of uncertainty. We will act on the basis of scientific evidence, but we will not let the absence of scientific proof hold us back.

5. Managing risks & deciding what to do

- 5.1. When we have received scientific advice, there will often be several possibilities and we will consider what is best in each case. We will – whenever possible - consult those affected, and then we will weigh up the possible options.
- 5.2. We will aim to be consistent and fair in our decisions. We will not make a decision without considering the likely benefits and costs. We will aim to base our recommendations and actions on the balance of risks and benefits to everyone concerned. However, we will always attach the greatest weight to protecting the interests of consumers.

- 5.3. We also recognise that different people have different concerns. We believe that as far as possible, consumers should be free to make their own choices. We will take into account both the level of risk and the public's views on whether they want to take it. We will try to give everyone the information they need to make that choice for themselves.
- 5.4. Our recommendations will pay particular attention to the risks. If the possible damage to people's health is likely to be severe or widespread, we will be prepared to recommend serious action if necessary. If, on the other hand, any damage is likely to be small, we may only recommend limited action. We will be sensitive to the possible risks to particular groups, such as young children, pregnant women, ethnic groups, older people and those with particular health problems.
- 5.5. Our response could take many forms. For example, we may issue advice to the public or to the industry. In some cases, we may decide to take action ourselves, if we have the powers to do so. Only Ministers and Parliament have the powers to make regulations or pass new laws. If we think that is what is needed, we will not hesitate to recommend action to Ministers, and to publish our advice.

6. Keeping everyone informed

- 6.1. Communication is a very important part of our work. We will be open in all our decision making. We propose to publish any substantive advice we give to other government departments. Our decisions and the basis for them will be made public. The few exceptions to these principles are explained in our Code of Practice on Openness.
- 6.2. We will also listen carefully to what people tell us. Except in an emergency, we will discuss the risks and the options for handling them with those who may be affected, and we will be open about doing this. We value the input that we can get from everyone who may be affected by our decisions – such as the public, consumer representatives, enforcement authorities and industry. We need to know what the consequences of our decisions will be before we make them. On major issues we may have a full-scale public consultation before we make up our minds, if there is time.

6.3. When we have reached a conclusion, we may decide to require certain people or organisations to take action, or we may decide that it is an issue on which people can make up their own minds. There may be cases when the measures already taken are sufficient, and we will not need to do anything. In any case we will make clear what the issues are, and aim to give advice that is clear and easy to understand.

Food Standards Agency

May 2001