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9 March 2018

Dear Heather

**ADVICE FROM THE WELSH FOOD ADVISORY COMMITTEE (WFAC) TO THE BOARD OF THE FOOD STANDARDS AGENCY ON ISSUES ADDRESSED BY THE COMMITTEE: MARCH 2018**

The key role of the Food Advisory Committees is to advise the Board of the Food Standards Agency. At yesterday's meeting, the WFAC considered the following issues that will be discussed by the Board:

- Science Update
- Update from the Chair of the Science Council
- Raw Drinking Milk Programme
- International Strategy

I am grateful to Patrick Miller, and Catherine Bowles for joining by video conference, and Simon Dawson for attending in person, to present their papers and for answering questions from members.

Science Update and Update from the Chair of the FSA's Science Council

Two papers were presented to the Committee, both from the personal perspectives of Professor Guy Poppy, the FSA's Chief Scientific Adviser (CSA) and Professor Sandy Thomas, the Chair of the FSA's Science Council. The first paper, was the annual report from the CSA which set out his view on FSA's science and discusses the opportunities and challenges ahead. The second paper, was a presentation from the Chair of the FSA's Science Council which

provided information and updates on progress being made on the priorities of each of the three workstreams of the Council (Science capability and assurance, risk and uncertainty and food system risks and horizon scanning). The presentation also provided detail on how the Council is working and its relationship with the FSA. In its considerations of areas which the FSA may need to focus on going forward, the WFAC made the following observations:

- that the right challenges for future attention were identified;
- that it was important that a strategic view should be taken to ensure that resources were being targeted to the right areas; and
- that it welcomed that the FSA had pursued the opportunity of a suggestion, previously submitted by the WFAC, in relation to the value of scientific secondments.

On a more general issue, the WFAC welcomed that the FSA would be undertaking a number of reviews to ensure that the FSA's scientific approach remains robust, particularly in relation to EU exit. In this respect, and appreciating that these two particular papers provided, a personal perspective, the WFAC commented that it would be useful to be explicit about the expected impact of the FSA's scientific approach. The WFAC commented that it would be beneficial to map out how scientific networks and pathfinding projects in each of Wales, England and Northern Ireland were contributing to the overall approach to science and was keen to assist in further developing the networks on receipt of more information about the current activity in Wales. Further the WFAC commented on the importance of ensuring continuity in recruitment within the scientific community ensuring that the FSA is able to access highly specialised scientific expertise. In its conclusions, the WFAC welcomed both reports.

### Raw Drinking Milk Programme

The WFAC welcomed the interim paper providing an overview of and an update on improvements in the delivery of official controls for raw drinking milk (RDM). The paper also included progress following the 2015 policy review, initial findings from the latest economic/customer research and an update on the RDM risk assessment. The WFAC observed the recent changes in the RDM landscape, as outlined in the paper, including an increased consumption of RDM, an increase in RDM producers in England and Wales and expressed concern at the increase in outbreaks of human disease associated with RDM. At the outset, the WFAC was reminded of the different legislative requirements relating to RDM in the UK and for RDM production in the UK. The WFAC was mindful of its previous advice to the Board which had informed the introduction of stronger, and compulsory labelling being introduced for RDM production in Wales.

Discussions were held on the implications of RDM being used for the making of milk shakes and ice cream and the implications this might have for vulnerable consumers. Further, the WFAC considered the implications of the addition of different sugars to RDM. WFAC was of the view that the addition of some sugar might provide an environment which would allow certain pathogens to grow more rapidly and thought this should be explored.

In its specific comments the WFAC made the following observations:

- concern about the sampling arrangements undertaken in Wales and England particularly in relation to the reliability of indicator organisms testing. WFAC was of the view that since indicator organisms testing did not test for specific pathogens, they represented a poor predictor of risk. In this context, the more rigorous testing regime in operation in NI, with the requirement for NI FBOs to have their own pathogen sampling process in place was noted, and welcomed;
- concern that RDM and RDM products may be being consumed by individuals who may not fully appreciate the public health risks; and
- concern that although it may be a personal choice to consume RDM that, due to potential for secondary spread, that individual choice might have implications for other individuals, including those who may be vulnerable and might subsequently be affected.

In noting that the paper was an interim paper, and that further information would be submitted to the Board in June, the WFAC made the following suggestions for inclusion in the next paper:

- the need for a greater understanding of the evidence which suggests an increasing demand for RDM and what is promoting this trend and any intelligence consumer insight and social science might bring to this;
- the need for robust scientific information to inform an appropriate level of official controls for RDM;
- the need for health impact assessments to fully explore the risk thresholds associated with RDM; and
- it is important the FSA explicitly considers all options for effective protection of the public's health – including limitation on sales, more effective controls and better public information.

The WFAC commented that the next update paper would need to be mindful of separate legislative requirements which exist across England Wales and NI. In respect of Wales, the WFAC reminded of the requirements of the Wellbeing

of Future Generations (Wales) Act 2015 aimed at improving the social, economic, environmental and cultural well-being of Wales. Members were mindful that the Act requires public bodies to act in a sustainable way and to ensure that the decisions that they take are preventative and take account for the impact they could have on people living their lives in Wales now and in the future. While appreciating that the FSA is not a named body in the Act, WFAC recalled that the FSA has previously agreed to align with the aims of the legislation. The WFAC was also mindful of the requirements of the Public Health (Wales) Act 2017 which sets out a requirement for mandatory health impact assessments in specific circumstances and asked officials to consider the requirement in the context of this example. Further, the WFAC shared a concern, voiced by stakeholders that attended the meeting, in relation to difficulties in providing a rating for direct sale under the mandatory Food Hygiene Rating Scheme in Wales. Local authority enforcement officers who attended the meeting commented that it was challenging to provide a rating for operators providing RDM where a full HACCP based safety management plan is not in operation.

In its conclusions, the WFAC welcomed the paper and asked that the comments that it had made above should be drawn out in greater detail in the paper which would be considered by the Board in June.

### International Strategy

The WFAC considered the paper which provided an update on the review of the FSA's existing international strategy and the proposed path for delivering a more strategic and coherent approach to the FSA's international engagement. The WFAC noted the rationale behind the FSA's international work and what it aims to achieve at international level as the UK exists the EU. In noting that the FSA will be revising its International Strategy to identify smarter and more coordinated ways to approach future international engagement, the WFAC made the following observations:

- the need for the future strategy to incorporate the different devolutionary requirements and for Wales in particular, to be mindful of Welsh Government's international growth agenda with regard to food and drink;
- that the FSA should prioritise its activity by risk in the food system; and
- that impacts and benefits should be clearly identifiable within revised strategy.

In summary, the WFAC welcomed the paper and recognised the valuable contribution that the FSA makes to global food safety. The WFAC commented that it looked forward to the development of the revised International Strategy.

### Other Matters

As usual, I provided a written report to the WFAC which gave a summary of discussions at the last Board meeting which included discussions on the National Food Crime Unit, Regulating Our Future (ROF), Antimicrobial Resistance, Surveillance and Social Science. My report also reported on WFAC's development day held in January, where the Committee held briefing sessions on Consumer Insight, ROF and Port Health in Wales and also had discussions with the new lead Director for the Environment and Rural Affairs in Welsh Government. I informed the Committee on the meeting held, in early January, with a number of Welsh Government Ministers where we discussed ROF and EU exit issues and of a separate meeting held with representatives of Directors for Public Protection Wales to discuss Welsh perspectives of the ROF programme. I also took the opportunity to update on the review of the Food Advisory Committees in Wales and Northern Ireland. Additionally, my report identified the issues which were discussed at the Board's strategic event held in January.

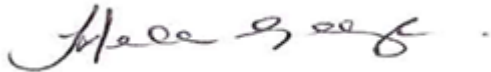
The WFAC was pleased to receive the report from the interim Director in Wales, which informed the Committee of a recently launched consultation on amendments to the Food Law Code of Practice for Wales, the signing of a Memorandum of Understanding with the Medicines and Healthcare Products Regulatory Authority to help inform FSA's work on food supplements and novel foods, and on the laying of a report before the National Assembly for Wales on a three year review of the implementation and operation of the Food Hygiene Rating Scheme in Wales and the annual review of the operation of the Scheme's appeals system. This report also updated the WFAC on progress being made to reach agreement between the four UK administrations on the need to maintain a UK wide framework for policy areas where this is currently maintained by EU legislation. In an oral update, the interim Director informed of a review commissioned by the FSA and Food Standards Scotland into the sites where meat products are processed and stored in the UK. The review comes in the wake of incidents involving major businesses in the meat industry over the last six months over adherence to hygiene rules designed to keep consumers safe and to sustain public trust in food. The Committee was informed of the terms of reference for the review, its scope and the proposed timetable. Members noted the importance of exploring the role of assurance schemes as part of the review.

Members raised other matters of business including highlighting a skills paper produced by the Food and Drink Board in Wales which would be circulated and progress on the revision of official controls EU2017/ 625 and its implications.

The WFAC's open meeting was held in Bangor University in North Wales. Following the meeting, the Committee took the opportunity to meet with key local stakeholders including representatives from two North Wales local authorities, Public Health Wales, Public Analyst Services, and the Food Technology Centre at Coleg Menai. Useful discussions were held on a range of issues associated with EU exit. I am proposing to hold a similar engagement with stakeholders in South and West Wales later in the year.

I am copying this letter to the Board Secretariat and to the Chief Executive.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alan G. G. G.", followed by a period.

pp Dr Ruth Hussey CB, OBE  
Chair of WFAC  
(Authorised by and signed in her absence)