Cross SAC Working Group on the framework for foods with an increased risk per serving

Note of 1st meeting, 11 March 2016 at 11am, Teleconference

Agenda

1. Welcome and introductions
2. Background
3. Terms of Reference – role and scope
4. Plan for workshop 31 March
5. Next steps and dates for diaries

Participants

Working Group Members:

David McDowell (ACMSF)
Gary Barker (ACMSF)
Alan Boobis (COT)
Leen Petré (GACS)
Dan Rigby (SSRC)
Joy Dobbs (SSRC)

Secretariat:

Patrick Miller (GACS Secretary, meeting chair)
Gwen Aherne (GACS secretariat)

FSA:

Steve Wearne (Director of Policy and Science), Guy Poppy (Chief Scientific Adviser), Penny Bramwell (Director of Science Evidence & Research), Diane Benford (Secretary to COT, head of risk assessment), Paul Cook (Secretary to ACMSF, head of microbiological risk assessment), Helen Atkinson (Secretary to SSRC).

Background

1. Patrick and Steve outlined the background and rationale for setting up the working group. The framework had evolved out of FSA consideration of controls for raw drinking milk and rare burgers. It is intended as a tool for risk managers to help ensure FSA decisions on these types of foods are more consistent and transparent.
2. Its development reflects the FSA's Strategy 2015-20,[1] which includes the consumer's right to be protected from unacceptable levels of risk. The framework should help the FSA in determining what risks are unacceptable and why, and what controls are appropriate where risks are not always unacceptable, while striking the necessary balance between protection from risks, choice and wider considerations such as sustainability.
3. The working group will work alongside the FSA to assist with the further development and use of the framework to ensure it is fit for purpose, as outlined in the scope.

[1] http://www.food.gov.uk/sites/default/files/Strategy%20FINAL.pdf

Terms of Reference – role and scope

4. The role of the working group will be to work with FSA to ensure the coherence of the model, and help identify the types of evidence required at each stage to allow risk managers' decisions to be informed by the evidence. This includes on the prioritisation of foods for which the framework will be applied and also on the approach to review and evaluation.
5. The Working Group asked for a list of working group members to be circulated.
6. Some members had difficulty seeing the whole framework on the scope document and the secretariat should ensure it is fully visible in future papers.
7. In discussing the role and scope of the group the following comments and clarifications were made.

Acceptability

8. It is important to be clear about who is determining whether a risk is acceptable and on what basis, in each of the three proposed 'zones of tolerability' and whether it is the individual consumer or the FSA. Acceptability and tolerability will mean different things to different consumers. These aspects need to be made clear in the framework.

Determining the criteria for foods to be applied to framework

9. One of the first tasks for the working group will be to advise on an approach to the identification and prioritisation of risks to which the framework would be applied. The definition based on risks per serving may need to be unpacked to capture other dimensions. These might include consideration of the frequency of consumption, population at risk and the nature of the risks. The temporal aspect of the risk is important, as are severity of effects and secondary effects.
10. The framework needs to be developed to include a space for this e.g. an initial box before the first step in the flowchart with criteria for inclusion and exclusion of foods from the framework. Examples of each would be helpful.

Evidence

11. The footnote on evidence in the scope description is important and should be incorporated into the role: *'It may be useful to think both in terms of the set of evidence that would ideally be available, and the minimum set of evidence which would allow reasonable judgement to be made.'*

Case studies

12. A way to test the coherence of the framework is to try using it. The fitness for purpose of the framework will depend on the foods or likely foods that it will be applied to. Is it a relatively small set of 'niche' foods or would it need to apply more generally? Steve commented that it is more the former than the more general risks and staple foods, but that it would be helpful to be able to set out in a clearer, more structured way how we determine which foods are assessed using the framework and which are not.
13. The framework should ideally be future proof, as far as possible, so that it can be used for new issues and emerging risks.
14. It could help the working group to consider case studies, for example if the framework had existed previously, what are the foods that we would have applied it to? However we would need to consider the extent to which it would be helpful to include detailed case studies in the

final published version of the framework. It may also be useful to capture the limitations of the framework and where and how it can, and can't be used more widely.

Other experience and expertise

15. Steve noted that he had discussed the framework and approach with the FSA's counterpart organisations in other countries and with regulators in other policy areas, and while some had done work to address aspects of this area, there doesn't appear to have been anything as integrated done before. This may reflect the challenges of developing an integrated approach in other jurisdictions where there is formal institutional separation of risk assessment and risk management.

16. Members noted that it would be helpful to have the perspective from other organisations that had developed a framework for decision making (not necessarily in the food sphere) on whose experience we could draw on in this work. NICE was suggested as a good example, and the FSA would follow this up.

Timescale

17. The working group will work with the FSA to a relatively short timescale of months to consider (as per the scope) the coherence of the framework, the question of acceptability (expert judgement and that of individual consumers), and the types of evidence needed at each stage of the framework. The aim is to have a framework that is considered fit for purpose, and to make any necessary changes to make it so.

18. It will not be possible to judge how many meetings will be needed until the working group starts to consider the framework in more detail at the first workshop planned for 31 March. It may be possible to divide up and operate work in parallel streams.

19. There will likely be a subsequent phase of work further down the line for review of the framework. The working group noted that reviewing operation of the framework after further iterations will be very important.

Plan for workshop 31 March

20. The working group agreed the draft agenda for the workshop.

21. Joy Dobbs undertook to provide written comments (on any gaps or things to clarify in the framework) as she cannot attend the workshop.

Actions and next steps

Action 1: Secretariat to circulate a list of working group members with the note of the teleconference.

Action 2: Secretariat to ensure framework and flowchart are correctly visible in future papers.

Action 3: FSA to discuss with NICE how they might contribute to the working group.

Action 4: Members to inform the secretariat of their availability and if possible hold the following provisional dates in diaries: teleconference 25 April; workshop 14 and 16 June