



**Triennial Review of Six Food Standards Agency Scientific  
Advisory Committees**

**24 March 2016**

**Title:** Triennial review report of the FSA Scientific Advisory Committees on, covering:

- The Advisory Committee on Animal Feedingstuffs (ACAF)
- The Advisory Committee on the Microbiological Safety of Food (ACMSF)
- The Advisory Committee on Novel Foods and Processes (ACNFP)
- The Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT)
- The Social Science Research Committee (SSRC)
- The General Advisory Committee on Science (GACS)

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Consumers and their representative bodies, Government departments, Government bodies, scientific communities, health and safety communities, the food and drink industry and their representative bodies and other health institutions with an interest in ACAF, ACMSF, ACNFP, COT, SSRC and GACS.

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# Contents

Contents.....	3
Executive Summary .....	5
1. Introduction and background.....	9
a. Aims of the Triennial Review .....	9
b. Evidence-gathering.....	9
2. Stage One Report .....	11
a. Function.....	11
b. Form .....	11
c. Advisory Non-departmental Public Bodies (ANDPBs) and Departmental Expert Committees (DECs).....	11
d. Gaps in advice identified during the review .....	12
e. Working across the UK.....	12
f. Function of the Committee on Toxicity (COT).....	12
g. Assessment of Form for COT .....	12
i. Assessment of Form for ACMSF .....	14
j. Function for the Advisory Committee on Novel Foods and Processes (ACNFP) .....	15
k. Function of the Advisory Committee on Animal Feedingstuffs (ACAF) .....	16
l. Assessment of form for a new Advisory Committee on Innovation in the Food Chain	18
m. Function of the General Advisory Committee for Science (GACS).....	19
n. Assessment of form for a new FSA Science Council.....	20
o. Function of Social Science Research Committee (SSRC).....	21
p. Assessment of Form for the Social Science Research Committee (SSRC) .....	22
3. Stage 2 Report.....	23
a. Governance and Operation of the SACs .....	23
b. Conflicts of Interest.....	23
c. Management of risk assessment options.....	23
d. Improving internal and external communication on science .....	24
e. Streamlining new ways of working.....	25
Annex A: Current Function, Composition and Cost of FSA Scientific Advisory Committees .....	27
Annex B - Review Process; Project Board Membership; Advisory Group Membership; Review Costs .....	31
Annex C - Initial Written Ministerial Statement of 21 September 2015.....	33

Annex D- Open Call for Evidence Questions ..... 34  
Annex E – Summary of Open Call for Evidence Responses..... 36  
Annex F - Call for Evidence Engagement Summary ..... 39

# Executive Summary

The Food Standards Agency (FSA), a non-ministerial, independent Government Department, has reviewed its six Scientific Advisory Committees (SACs) listed below, as part of its governance and funding of these bodies. The review was timely given the new FSA Science Governance arrangements introduced in 2014, the publication of the FSA's new Strategic Plan: Food We Can Trust 2015-2020<sup>1</sup> and its underpinning Science, Evidence and Information Strategy 2015-2020.<sup>2</sup> The six SACs reviewed were:

- The Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT);
- The Advisory Committee on the Microbiological Safety of Food (ACMSF);
- The Advisory Committee on Novel Foods and Processes (ACNFP);
- The Advisory Committee on Animal Feedingstuffs (ACAF);
- The Social Science Research Committee (SSRC);
- The General Advisory Committee on Science (GACS).

The FSA SACs are all non-statutory and Advisory Non-Departmental Public Bodies (ANDPBs), which are subject to triennial review under the Cabinet Office (CO)<sup>3</sup> Public Bodies review programme. The SACs provide independent expert advice to the FSA and other Government Departments (OGDs) as appropriate, in key areas of risk assessment, current and emerging scientific issues and the FSA's use of science. SACs classed as ANDPBs must meet all of the three criteria below under the current CO guidance:

- Is this a technical function which needs external expertise to deliver?
- Is this a function which needs to be delivered with absolute political impartiality?
- Is this a function which needs to be delivered independently of Ministers to establish facts or figures with integrity?

If they do not meet these criteria then their functions can be delivered through an alternative model, the most common alternative for SACs being an Expert Committee of the sponsor Department.

The function of the triennial review process, which started in September 2015 and concluded in March 2016, is to provide assurance to the FSA, wider Government and consumers that the future SAC functions are appropriate in addressing the needs of the FSA and wider Government, and that the bodies are operating effectively whilst taking account of the requirement for public sector efficiency.

The triennial review has followed two stages:

**Stage one** looked at the ongoing need for the functions provided by the body and the benefits to users and stakeholders; it then considered the best delivery model for the functions that are still needed;

**Stage two** considered how the body operates, including relationships with stakeholders, opportunities for efficiencies and improved performance, and governance.

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<sup>1</sup> <http://www.food.gov.uk/about-us/about-the-fsa>

<sup>2</sup> <http://www.food.gov.uk/sites/default/files/fsa151104.pdf>

<sup>3</sup> <https://www.gov.uk/government/publications/public-bodies-reform-reports>

The review considered the six SACs together, to enable a more efficient process, consider common issues and strands of evidence (e.g. on shared governance) and for a better evaluation of how the SACs work with each other and with other relevant bodies.

The full report describes the purpose of the triennial review, the approach taken, the evidence collected and the assessment of this evidence against the criteria for the review to present the resulting eight recommendations.

The review makes four recommendations under stage one, concluding that there is an ongoing need for the functions provided by the COT and the ACMSF, which provide scientific advice on chemical and microbiological risk assessment, that is core to the FSA and Government. The review concludes that the most appropriate delivery model for these functions is through their continued operation as ANDPB's.

The recent agreement to move the approval process on the Novel Foods Regulation to Europe, previous movement of the animal feed approvals to Europe and a growing European and UK commercial interest in innovation in food and feed has allowed the review to consider the future function of the ACNFP and the ACAF together, and in the wider context of the FSA requirements for future expert advice on innovation. Changes in the Novel Food Regulation are expected to reduce the current review of novel food applications within the ACNFP and the review concludes that the FSA should replace the ACNFP's other advisory risk assessment functions and those of the ACAF with a new Committee which would retain any future functions required from these two committees within a wider remit on innovation in the food chain. This should be done through a consultative process that is completed by December 2017. This new Committee should have the necessary expertise to advise FSA on emerging issues and innovation in food and feed (with a focus on food safety) and the flexibility to create sub-groups or to work with other SACs to provide risk assessment advice to the FSA on priority areas such as allergens and on the biotechnology of food and feed. The review concludes that the new Committee should operate as an expert committee to advise the FSA.

The ACNFP currently provides a review function for novel food applications, which should continue until the EC provides clarification on the future process under the remit of the European Food Safety Authority (EFSA). Once the future process is clarified, then the FSA should consider all options to put this on a more cost effective footing.

Two Committees, the GACS and the SSRC, were identified during the review as SACs which currently fulfil an internal advisory role for FSA. New science governance arrangements within the FSA, introduced in 2014, include the recent appointment of an external Chief Scientific Adviser (CSA). This change has provided an opportunity to consider how FSA will provide support to its CSA through providing scientific insight, challenge and views on the FSA's use of science in areas within its remit. The review concludes that the FSA should follow similar models in OGDs with external CSAs, and replace the GACS (established in 2007 to provide independent advice and challenge to FSA's then internal Chief Scientist) with a Science Council. The Science Council would work closely with the CSA and would be able to co-opt additional expertise and work with other groups where required. To safeguard its independence, the Chair of the Science Council would be able to raise any issues directly with the FSA Chief Executive and Board Chair. The new Science Council should operate as an expert committee of the FSA. Regular discussion between the Chairs of the SACs, which has taken place through their

membership of the GACS, would continue through a separate mechanism which is incorporated into the stage 2 recommendations.

FSA requires expert advice from social scientists in relation to its remit on food safety and consumer interests which presents a number of complex and challenging issues for which social science insights are fundamental. Given the strategic and growing demand in FSA, across Government and internationally for social science expertise to look at strategic issues such as vulnerability, assessment of economic and other benefits including impact, and consumer, business and regulatory behaviour change, the review recommends that the SSRC should review its future work programme and membership to provide strategic support, scientific advice and challenge which will inform the FSA in delivery of its strategic objectives and help understand its impact of the priorities in the new FSA Strategic Plan. The review concludes that the revised Social Science Research Committee in its current form should become an expert committee for FSA, reflecting its focus on advising the FSA.

The Social Science Research Committee, the new Committee on Innovation in the Food Chain and the new FSA Science Council, as expert committees for the FSA, should work to the same Government and FSA guidelines for the provision of scientific advice and in an open, independent and transparent manner as is currently applied to those SACs within Government which are ANDPBs.

In considering the operation and governance of the SACs, under stage 2, the review makes four further recommendations for actions to improve the impact and efficiency of the SACs' work and to ensure that they continue to meet the highest standards of scientific advice and governance for FSA. This includes updating the FSA guidance on conflicts of interest, optimising the relevance and impact of SACs' advice and the transparency of its use in risk management, improved communication on cross-cutting scientific advice across Government by considering regular meetings with other SAC Chairs, embracing new technologies in running SAC functions and working with OGDs to ensure that efficient and effective ways of working are exploited such as joint secretariats and working groups.

The eight recommendations of the Triennial Review are summarised as follows:

### Stage One Recommendations

**Recommendation 1:** The review recommends that there remains a clear requirement from FSA and Government for the scientific advisory functions provided by the COT and the ACMSF. These two committees should continue to operate as ANDPBs.

**Recommendation 2:** The dossier review function for novel foods, currently provided by ACNFP should continue until the EC provides clarification of the future process under the remit of the European Food Safety Authority (EFSA), then the FSA should consider future options by December 2017. FSA should replace the risk advisory functions of the ACNFP and the ACAF with a new core expert Committee, which would retain any future functions required from these two committees within the framework of a wider remit on innovation in the food chain. The new Committee on Innovation in the Food Chain, should be established by December 2017 and should operate as an expert committee of FSA, reflecting its more focussed role in advising FSA and the likely volume and nature of its work.

**Recommendation 3:** FSA should replace the GACS with a new high level Science Council to provide insight, challenge and support for the Chief Scientific Adviser (CSA) and FSA. The new Science Council should follow other Government models like those in Defra such as the Science Council and the Royal Commission on Environmental Pollution. The new FSA Science Council should operate as an expert committee of FSA.

**Recommendation 4:** FSA should ensure that the Social Science Research Committee (SSRC) provides clear evidence of its impact, through a work programme that focuses on strategic advice and challenge which will help the FSA to apply the latest social science insights effectively to deliver its strategic objectives and understand their impact. The SSRC should become an expert committee of the FSA, reflecting its future focus on advising the FSA and the likely volume and nature of its work.

### Stage Two Recommendations

**Recommendation 5:** FSA should update its approach and current guidance on conflicts of interest (COI) including considering other models in use across Government nationally and internationally and their efficacy in protecting consumer interests and ensure that its SACs consistently follow the revised guidance.

**Recommendation 6:** To ensure that SACs' advice addresses appropriate issues for FSA and across Government, in ways which optimise its relevance and impact and the transparency of its use in risk management, FSA should ensure appropriate iterative dialogue with its SACs, including through effective application of its 'Framework for dialogue between FSA and the SACs'.

**Recommendation 7:** Communication should be strengthened between the SACs and the wider external scientific, Government, customer and stakeholder communities including other Government Departments and their Committees to ensure the process for using the SACs is efficient and effective and that strategies and advice are aligned for consumers.

**Recommendation 8:** FSA should work through its secretariats and Chairs (both with individual SACs, as a group and with OGDs) to consider joint working, using new tools and technologies, external expertise and other means to make efficiencies (including cost savings) that can be used to make the best use of members' and secretariats expertise and time and help develop FSA staff and Committee members for the future.



# 1. Introduction and background

## a. Aims of the Triennial Review

- 1.1. All non-statutory and Advisory Non-Departmental Public Bodies (ANDPBs), are subject to regular review under the Cabinet Office (CO) Public Bodies review programme. FSA reviewed ACAF, ACMSF, ACNFP, COT and GACS in 2011<sup>4</sup> and SSRC in 2013<sup>5</sup>. FSA has reviewed these six SACs again in 2015/16, as part of the CO public bodies programme and its governance and funding of these bodies. Summaries of the SACs' remit and current membership are provided in Annex A.
- 1.2. The review also looked at the potential future role of the SACs to fully support the FSA in its new science governance arrangements, delivering its Strategic Plan: Food We Can Trust 2015-2020<sup>6</sup> and its Science, Evidence and Information Strategy 2015-20.<sup>7</sup>
- 1.3. The review has followed two stages:

**Stage one** looked at the ongoing need for the functions provided by the body and the benefits to users and stakeholders; it then considered the best delivery model for the functions that are still needed;

**Stage two** considered how the body operates, including relationships with stakeholders, opportunities for efficiencies and improved performance, and governance.
- 1.4. The triennial review considered the six SACs together, to enable a more efficient process, consider common issues and strands of evidence (e.g. on shared governance) and for a better evaluation of how the SACs work with each other and with other relevant bodies.
- 1.5. Reviewing the SACs together allowed the FSA to consider its future need for independent, expert scientific advice and to identify and consider any gaps and overlaps in their delivery. The review considered the work of the SACs in advising FSA and other parts of Government across the UK.

## b. Evidence-gathering

- 1.6. The review gathered evidence in a number of ways, including:
  - i. Written material: publications, reports, stakeholder views, relevant press, previous reviews and the actions taken in response to their recommendations;
  - ii. Interviews: with key stakeholders; these included: SAC Chairs, a selection of members and their secretariats; the FSA Board Chair and Deputy Chair, Directors and senior staff within FSA and other bodies (including Department of Health (DH), Public Health England (PHE), the Department for Environment, Food and Rural Affairs (Defra), the Department for Environment and Climate

<sup>4</sup> [www.food.gov.uk/science/ouradvisors](http://www.food.gov.uk/science/ouradvisors)

<sup>5</sup> <http://ssrc.food.gov.uk>

<sup>6</sup> <http://www.food.gov.uk/about-us/about-the-fsa>

<sup>7</sup> <http://www.food.gov.uk/sites/default/files/fsa151104.pdf>

Change (DECC) and Health and Safety Executive (HSE), Food Standards Scotland (FSS), Department of Agriculture and Rural Development Northern Ireland (DARD)) that commission, collaborate or use SAC advice. A total of 51 interviews were carried out during the evidence gathering phase of the review and interviewees are summarised in annex F;

- iii. A call for evidence: published on the FSA website ran from 21 September until 5 November 2015, generated 1296 (992 unique) website hits and received 14 completed responses. This included a questionnaire asking key questions and/or the opportunity to submit written evidence. A summary of the open call is provided in Annex E;
- iv. Three workshops one with SAC members and FSA staff, one with GACS and one with external interested parties were held during the evidence gathering phase of the review.

## 2. Stage One Report

### a. Function

- 2.1. Evidence gathered in the review process, from internal and external policy leads (including from OGDs), industry, consumers and national organisations, confirmed the ongoing need for scientific advice to support the FSA to deliver its Strategic Plan: Food We Can Trust 2015-2020 and its Science, Evidence and Information Strategy 2015-20, and wider Government needs where relevant.

### b. Form

- 2.2. This review primarily considered whether the functions of the Committees are still needed, and if they are, whether they should be merged with another body, whether they should be brought in-house (as an FSA expert committee or delivered by FSA staff), and finally what form they should be maintained as.

### c. Advisory Non-departmental Public Bodies (ANDPBs) and Departmental Expert Committees (DECs)

- 2.3. Since the FSA last reviewed its SACs, OGDs have reviewed and changed the status of some of their SACs (statutory and non-statutory bodies) and moved them from ANDPBs to DECs. The evidence collected during the review process including from external SAC Chairs has indicated that since this transition, the Committees have maintained the same level of independence and expertise e.g. the Scientific Advisory Committee in Nutrition (SACN), the Committee of Carcinogenicity (COC) and the UK Expert Committee on Pesticides. The review identified that DECs can be more flexible and new members can be recruited in shorter timeframes due to simpler procedures for appointments. The review identified that the change in Committee status had led to some members leaving but that there had been no problems in the recruitment of new members into the DECs.
- 2.4. All SACs, irrespective of their status as ANDPBs or as DECs, should follow the cross-Government guidelines (and for FSA SACs, the FSA guidelines) for the provision of scientific advice and in an open, independent and transparent manner. All FSA SACs would continue to have direct access to the FSA's Chief Scientific Adviser, Chief Executive and Board Chair, to raise any concerns.
- 2.5. The FSA lead reviewer is aware of wider Cabinet Office work being undertaken to consider the role and status of ANDPBs and DECs on a government-wide basis which will produce a set of indicators to help Departments identify and review the status of their current Committees. The conclusions from this work are not yet finalised, but the work to date has been reflected in the future status of the proposed FSA committees to ensure that they are fit-for-purpose.

#### **d. Gaps in advice identified during the review**

2.6. The review process identified gaps, where FSA and Government's current and emerging future evidence needs are not met (or not met effectively) by the current SAC structure: allergens (clinical), biotechnology in food and feed, global food processing in food and feed (these three gaps are discussed under recommendation 2) and work on using big data. The review noted that the latter was considered in an earlier GACS report<sup>8</sup> and then by FSA, through a cross Government workshop.

#### **e. Working across the UK**

2.7. There was unanimous support in the evidence gathered for the future SACs to continue to work across the UK to ensure that there is consistency and a lack of conflict in the scientific advice available to consumers and businesses.

2.8. However, FSA should work with OGDs to ensure that the most efficient and effective ways of working are reflected by considering joint secretariats and working groups, as reflected in the stage 2 recommendations 7 and 8 of this review.

#### **f. Function of the Committee on Toxicity (COT)**

2.9. There was general agreement from within FSA, OGDs, industry, and from other organisations that COT plays an important role in providing expert advice which ensures an independent and balanced approach is taken to the appropriate protection of public health from toxic chemicals. COT is effective, fit-for-purpose and delivers advice which helps shape UK Government policy and contributes at EU, CODEX and WHO level. Evidence gathered included:

- the Committee works and collaborates well with other SACs including those within OGDs (Defra, PHE, DH and Department for Transport) on food and non-food issues;
- the advice provided by COT is open, transparent, comprehensive and balanced;
- the committee members have specialist knowledge which is not duplicated in other SACs and is reviewed annually;
- the diversity of expertise allows for accurate risk assessments;
- the committee expertise is recognised internationally;
- the secretariat is effective.

2.10. The review evidence collected confirmed a need for the current functions of COT, including advice to OGDs e.g. on aspartame, possible risks associated with chemicals in the infant diet, adverse effects of high levels of Vitamin D, possible harmful effects of organophosphates and cabin air exposures.

#### **g. Assessment of Form for COT**

2.11. COT is an Advisory Non-Departmental Public Body. The review considered the following alternative delivery models for COT functions:

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<sup>8</sup> <http://gacs.food.gov.uk/gacsgroups>

- 2.12. **Bring the functions in house** - COT functions should be delivered independently and impartially from FSA and Ministers. It would not be cost-effective to deliver COT functions using FSA or PHE staff.
- 2.13. **Contract directly with the experts** - This could deliver the same results, but is unlikely to be a more cost-effective model as it would require a similar membership and secretariat functions. Costs for the current Committee i.e. recruitment of members, travel costs, and remuneration for members are currently £160-230 per day and are much lower than current commercial consultancy rates (£1,000-1,500 per day). There is also a risk that a fully commercial arrangement, with experts acting as consultants, could affect real or perceived independence and the objectivity of advice.
- 2.14. **Merge with similar bodies** - There are two sister Scientific Advisory Committees within Government. These are:
- **The Advisory Committee on Mutagenicity (COM);**  
COM provides independent advice to UK Government departments and agencies on the human mutagenic risk of specific chemicals (the risk that these chemicals might cause mutations or damage to genetic material). COM also advises on important general principles and new scientific discoveries associated with the assessment of genotoxic risk, and makes recommendations on mutagenicity testing.
  - **The Advisory Committee on Carcinogenicity (COC);**  
The Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment (COC) assesses and gives advice to Government on carcinogenic risk to humans. It advises on important general principles or new scientific discoveries in connection with carcinogenic risks, co-ordinates with other bodies concerned with the assessment of carcinogenic risks, and makes recommendations for carcinogenicity testing.
- 2.15. The recently published DH review<sup>9</sup> of COM considered mergers between COM and other bodies, in particular the COC and the COT. The review concluded that the work of COT was quite different from COM or COC and that any merger would be likely to lead to inefficiencies and a loss of expertise.
- 2.16. The COM review report recommended that an annual planning exercise is conducted with COC and with COT to ensure flexible and coordinated approaches are adopted on work of joint interest. This review supports that conclusion and is considered further in stage 2 under recommendation 8.
- 2.17. **Continued Delivery as an ANDPB** COT meets the three tests, defined by Cabinet Office, to be considered appropriate for ANDPB status. It clearly performs a technical function, requires expertise and political impartiality, and it should be independent from FSA and Ministers.

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<sup>9</sup> [www.dh.gov.uk](http://www.dh.gov.uk)

2.18. The evidence gathered during the review, including views from a variety of stakeholders, indicated that policy on food safety and food regulation should be informed by expert advice on risks from chemicals in food that is independent and that is delivered in an open and transparent way.

## **h. Function of the Advisory Committee on Microbiological Safety of Food (ACMSF)**

2.19. There was general agreement within FSA, OGDs, industry, individuals, organisations and enforcement professionals, that the Committee is effective, fit-for-purpose and delivers a quality service in shaping UK Government policy and legislation to provide input at European, WHO and CODEX level. Evidence gathered included that:

- the Committee works and collaborates well with other SACs (SSRC, COT, ACNFP) including those within OGDs (Defra, PHE, DH) on microbiological food safety issues;
- advice provided is open, transparent, comprehensive and balanced;
- committee outputs are recognised internationally;
- committee members have specialist knowledge which is not duplicated in other SACs and is reviewed annually;
- the diversity of expertise allows for accurate assessments;
- the secretariat is effective and its meetings are well attended;
- the industry widely use the Committee's advice to improve business practice (information is required to run safe food establishments);
- the enforcement officers rely on the Committee for information on risk assessments and scenarios that they can use in practice.

2.20. The evidence collected confirmed a need for the current functions of ACMSF. There was evidence that other Government agencies and departments seek its advice e.g. on antimicrobial resistance in the food chain, food-borne viral infections, raw, rare and low temperature cooked foods and Salmonella in eggs. The work that it conducts is considered important, its advice is highly respected both nationally and internationally and it plays an important role in providing independent expert advice which ensures an independent and balanced approach is taken to providing microbiological risk assessment for food. Stage two recommendations cover improvements in performance, efficiency and governance that can be made for all the SACs under review.

## **i. Assessment of Form for ACMSF**

2.21. ACMSF is an Advisory Non-Departmental Public Body. The review considered the following alternative delivery models for ACMSF functions:

2.22. **Bring the functions in house** - ACMSF functions should be delivered independently and impartially from FSA and Ministers. It would not be cost-effective to deliver ACMSF functions using FSA staff.

- 2.23. **Contract with the experts** - This could deliver the same results, but is unlikely to be a more cost-effective model as it would require a similar membership and secretariat functions. Costs for the current Committee i.e. recruitment of members, travel costs, and remuneration for members are currently cost £160-230 per day and are much lower than current commercial consultancy rates (£1,000-1,500 per day). There is also a risk that a fully commercial arrangement, with experts acting as consultants, could affect real or perceived independence and the objectivity of advice.
- 2.24. **Merge with similar bodies** - The evidence gathered from OGD's clearly indicated that there are no similar SACs within Defra or DH/PHE. Indeed ACMSF provides an important, unique role and the evidence clearly indicates that it has close links with OGDs who provide experts to sit on ACMSF sub-groups as necessary.
- 2.25. **Continued Delivery as an ANDPB** - ACMSF meets the three tests, defined by Cabinet Office, to be considered appropriate for ANDPB status. It clearly performs a technical function, requires expertise and political impartiality, and it should be independent from FSA and Ministers.
- 2.26. The evidence gathered during the review, including views from a variety of stakeholders, indicated that policy on food safety and food regulation should be informed by expert advice on risks from microbiological agents in food that is independent and that is delivered in an open and transparent way.

**Recommendation 1:** The review recommends that there remains a clear requirement from FSA and Government for the scientific advisory functions provided by the COT and the ACMSF. These two committees should continue to operate as ANDPBs.

#### **j. Function for the Advisory Committee on Novel Foods and Processes (ACNFP)**

- 2.27. The review indicated a time-bound demand for the current function of ACNFP; to provide a charged service for assessing novel food applications from businesses both within the UK and internationally. The evidence collected internally and externally all mentioned this application process as an important function for the UK as a European Union (EU) member state (MS). ACNFP advice is highly respected both nationally and internationally e.g. for its work on Chia seeds for use in cereals and sprinkles, its workshop on health claims and classification of medicines and associated issues and the application to put *Clostridium Butyricum* on the market.
- 2.28. A transition period, agreed in December 2015, for the new EU Novel Foods legislation means it will come into force on 1 January 2018. This change is expected to significantly reduce (or even remove) the need for assessments of novel food applications at national level. The dossier review function for novel foods, currently provided by ACNFP, should continue until the EC provides clarification of the future process under the remit of the European Food Safety Authority (EFSA), then the FSA should consider future options by December 2017.

- 2.29. Evidence gathered during the review process indicated that;
- the Committee was widely recognised by companies dealing with novel food applications and known for the quality of its experts and transparency of its process;
  - the committee outputs are recognised internationally;
  - the secretariat is effective.
- 2.30. FSA should consider;
- maintaining independent scientific expertise to inform EU risk assessment and policy in novel foods and new technologies;
  - developing Committee expertise in biotechnology and global food processing including developments in process engineering and food technology and packaging;
  - the outcomes of EC discussions to clarify the future novel food application process under the remit of the European Food Safety Authority (EFSA) and whether a future charging system for commercial enterprises to review novel food applications and support UK and European businesses is required and can be supported by FSA.
- 2.31. It is clear that there is no other SAC within the UK Government which looks at novel foods, although there are interests across government in this area such as Defra's Hazardous substance Advisory Committee (HSAC) which advises on nanomaterials and similar assessment and authorisation services are provided in other MS. The majority of ACNFP's current work is on applications for authorisations of novel foods, but it has employed discussion sessions and workshops to horizon scan emerging issues and innovations and their implications for consumers; the latter will be more important in the future for the FSA.

## **k. Function of the Advisory Committee on Animal Feedingstuffs (ACAF)**

- 2.32. Evidence collected during the review indicated the use for an independent body that looks at animal feed due to the link into the human food chain and food safety. The agricultural sector, including OGDs, and feed manufacturers particularly value ACAF advice on issues such as copper supplementation in cattle feed and the marketing and use of former foodstuffs used in animal feed. European legislation for animal feed and authorisation approval is centralised by EFSA in Europe. ACAF can help provide advice on EU, WHO and CODEX feed proposals which are welcomed by the feed and farming industry.
- 2.33. Evidence collected during the review process indicated that;
- the Committee advice provided is open and transparent;
  - the committee outputs are recognised internationally;
  - the secretariat is effective and meetings are well attended particularly by industry.
- 2.34. It is clear that there is no other SAC within Government which looks at animal feed; however, there was no clear evidence to suggest that ACAF should remain as a SAC within FSA. There was evidence from OGDs (DARD and Defra)



that they find the work of ACAF useful from the perspective of maintaining a watching brief on animal feed issues which underpin the food chain for livestock.

### **Future function of ACNFP and ACAF**

- 2.35. There was clear support for the quality of advice provided by the two Committees particularly to support industry. Stakeholders indicated that although there was a centralised EU feed application process and likely to be a future centralised EU novel food application process, the FSA should consider maintaining scientific expertise to inform risk assessment and policy development in these areas where required. At the same time, the FSA needs to address the gap identified in this review for expert advice on a wider range of issues relating to innovation in the food chain and their implications for food safety and consumers' interests. This wider remit should include advice on novel food and feed and include emerging and new innovation (including those in biotechnology, process engineering and food technology including packaging) to inform EU, CODEX and WHO negotiations and discussions. In creating the new Committee, FSA should also take account the Agri-Tech strategy and its Leadership Council and the developing Defra and GO-Science strategy for animal and plant health science.
- 2.36. There are overlaps between ACNFP and ACAF but also complementarity in the expertise of the members. FSA needs to consult fully with the ACNFP, ACAF, OGDs (particularly agriculture departments across the UK) and industry stakeholders to construct and define a new Committee which is fit-for purpose to advise the FSA in the future. The new committee should ensure that its scientific expertise is widely available and called upon by the FSA and informed by wider inputs from other committees and experts, where necessary, and this discussion is developed under the stage 2 recommendation 7.
- 2.37. This needs to respond to the wider future requirements for advice to FSA on innovation in food and feed (in the context of food safety); this suggests a need for a more flexible structure with a core expert advisory group which has the ability to draw in wider expertise to look at cross cutting issues and through sub-groups as required, and to work with and other SACs in Government and form an expanded call off pool of scientific experts.
- 2.38. The dossier review function for novel food applications, currently provided by the ACNFP, should continue until the EC provides clarification on the future process under the remit of the European Food Safety Authority (EFSA). Once clarification is provided then the FSA should consider future options, for putting this work on a self-supporting basis, which may include those mechanisms used to support businesses by OGDs e.g. such as on biocides within the Health and Safety Executive.
- 2.39. Small cross-SAC working groups could be set up immediately: on allergy to provide risk assessment advice on this key gap identified in the review, and to shadow and help to inform the development of the remit of the new Committee, using this model (explored further in recommendation 7). This consultative process should take account of the changing needs of the UK, to contribute to future EU food and feed negotiations.

## I. Assessment of form for a new Advisory Committee on Innovation in the Food Chain

2.40. The review considered the following alternative delivery models for the new Committee functions:

2.41. **Bring the functions in house** - This option was considered the most appropriate for the future operation of a new Committee to give the FSA flexibility over membership which it requires to cover advice on a range of areas and emerging issues as discussed above. The new Committee will provide an internal expert advisory role for FSA and should become an expert Committee. The functions of the Committee would continue to follow the guidance on provision of scientific advice to Government and operate openly and transparently. It would not be cost-effective to deliver the future Committee functions using FSA staff.

2.42. **Contract with the experts** - This could deliver the same results, but is unlikely to be a more cost-effective model as it would require a similar membership and secretariat functions. Costs for the current Committee i.e. recruitment of members, travel costs, and remuneration for members are currently £160-230 per day and are much lower than current commercial consultancy rates (£1,000-1,500 per day). There is also a risk that a fully commercial arrangement, with experts acting as consultants, could affect real or perceived independence and the objectivity of advice.

2.43. **Merge with similar bodies** - There are no other SACs within Government which advise on innovation in food and feed. However, there is one other SAC that advises on GM issues in relation to the release of GMOs into the environment and one other Defra Expert Group on Hazardous Substances which looks at nanomaterials. These are:

- **The Advisory Committee on Releases to the Environment (ACRE)** which is a statutory advisory committee appointed under section 124 of the Environmental Protection Act 1990. It advises Defra, OGDs and the devolved administrations on risks to human health and the environment from the release and marketing of genetically modified organisms (GMOs).

A recent review of ACRE by Defra<sup>10</sup>, published in February 2015, considered that while a single committee covering all aspects of GM is possible, any merger seems likely to be less effective than the current arrangements because there is little overlap in the function and necessary expertise; there is little alignment between ACRE's work on contained use and environmental risks and the food and feed work. The review identified that GM considerations have not to date been a major part of the work done by ACNFP and ACAF but that the FSA should have access to GM advice should this be necessary.

- **Hazardous Substance Advisory Committee (HSAC):** The HSAC was created in 2012 and provides expert advice to Government on how to protect the environment, and human health via the environment, from potentially hazardous substances and articles, including nanomaterials.

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<sup>10</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/416522/triennial-review-acre-2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416522/triennial-review-acre-2015.pdf)

The HSAC does not have a specific remit in food and feed innovation (relative to food safety) but FSA would need to ensure that any new committee is complementary to HSAC.

- 2.44. **Continued Delivery as an ANDPB** - The new Committee is not considered appropriate for ANDPB status. It does need to consist of high-level specialist scientific expertise independent of FSA but will provide a specific expert advisory function via sub-groups for the FSA to support delivery of the Strategic Plan and Science and Evidence Strategy.

**Recommendation 2:** The dossier review function for novel foods, currently provided by ACNFP should continue until the EC provides clarification of the future process under the remit of the European Food Safety Authority (EFSA), then the FSA should consider future options by December 2017. FSA should replace the risk advisory functions of the ACNFP and the ACAF with a new core expert Committee, which would retain any future functions required from these two committees within the framework of a wider remit on innovation in the food chain. The new Committee on Innovation in the Food Chain, should be established by December 2017 and should operate as an expert committee of FSA, reflecting its more focussed role in advising FSA and the likely volume and nature of its work.

### **m. Function of the General Advisory Committee for Science (GACS)**

- 2.45. The GACS was set up in 2007 to provide independent, impartial advice and challenge to the internal FSA Chief Scientist and the FSA Board on the FSA's governance and use of science. It was reviewed in 2011.
- 2.46. In 2014, the FSA revised its internal arrangements for governance on science and appointed an external Chief Scientific Adviser for FSA. The review concludes that the FSA should adopt new arrangements for scientific advice, challenge and support to its CSA. Therefore, the GACS should be replaced with a newly appointed, smaller (4-5 members) expert Committee of leading scientists, from relevant and related fields to FSA's priorities, as the new FSA Science Council. This will continue to ensure that robust high-level expert challenge and advice continues to be available for the FSA CSA and the Board. It is also in line with the approach taken by OGDs who have established Science Councils to provide high-level advice and challenge to their external CSAs.
- 2.47. The new Science Council will work closely with the CSA and its independence would be safeguarded by providing its Chair with an open invitation to raise any concerns directly with the FSA Chief Executive and Board Chair. The future Committee would be an in-house function for FSA, which is in line with other Government models such as those in Defra e.g. their Science Council and the Royal Commission on Environmental Pollution. This new Science Council would fit the CO guidance under stage 1 of the review process to operate as an expert committee of FSA.

2.48. The regular meeting of SAC chairs through the GACS was seen to be beneficial but did not need to be linked to the advice mechanism to support the CSA and some interviewees suggested that the presence of the SAC Chairs on GACS could be seen as a constraint on its ability to provide fully independent challenge across the FSA's use of science from its Committees. The review recommends that the Chairs of the FSA SACs should continue to maintain the benefits of this interaction, and would continue to meet at least twice per annum - once with the Chairs from all the FSA SACs to discuss horizon scanning and once via a wider forum to include Chairs from OGD SACs with an interest in food e.g. the recently created Defra chairs group. This creates an opportunity to broaden this engagement of SAC Chairs to include OGDs particularly Defra and DH/PHE (as explored in stage 2 recommendation 7). The SAC Chairs will continue to have direct access to the FSA CSA to raise any issues of cross-cutting relevance, any concerns regarding the FSA support to SACs or their work and as part of their annual appraisal process.

#### **n. Assessment of form for a new FSA Science Council**

2.49. The review considered the following delivery models for a new FSA Science council:

2.50. **Bring the functions in house** - This option was considered the most appropriate for the future operation of a new Science Council. As discussed above it will be an internal advisory committee for FSA and its CSA and should become an expert committee for FSA. The functions of the Committee would continue to follow the guidance on provision of scientific advice to Government and operate openly and transparently. It would not be appropriate to deliver the Science Council functions using FSA staff.

2.51. **Contract with the experts** - This could deliver the same results, but is unlikely to be a more cost-effective model as it would require a similar membership and secretariat functions. Costs for the current Committee i.e. recruitment of members, travel costs, and remuneration for members are currently £160-230 per day and are much lower than current commercial consultancy rates (conservatively at £1,000-1,500 per day). There is also a risk that a fully commercial arrangement, with experts acting as consultants, could affect real or perceived independence and the objectivity of advice.

2.52. **Merge with similar bodies** - The evidence gathered from OGD's did indicate similar CSA advisory bodies within OGDs e.g. Defra. The strategic role of a new Committee in advising FSA and its CSA should not be merged as it provides a specific strategic challenge role for the FSA.

2.53. **Continued Delivery as an ANDPB** - The new Committee is not considered appropriate for ANDPB status. It does need to consist of high-level specialist scientific expertise independent of FSA but provides a specific internal strategic function for the FSA and its CSA to support delivery and future direction of the Strategic Plan and Science and Evidence Strategy.

2.54. The regular meeting of SAC chairs was seen to be beneficial but not a key role for GACS and this should be decoupled from the Committee and broadened to include OGDs particularly Defra. This is discussed under stage 2 recommendation 7. The future role of the new Council is an in-house function for FSA and fits the CO guidance under stage 1 of the review process that the most appropriate form is as an expert committee of FSA.

**Recommendation 3:** FSA should replace the GACS with a new high level FSA Science Council to provide insight, challenge and support for the Chief Scientific Adviser (CSA) and FSA Board. The new Science Council should follow other Government models such as the Defra Science Council and the Royal Commission on Environmental Pollution. The new FSA Science Council should operate as an expert committee of FSA.

### **o. Function of Social Science Research Committee (SSRC)**

2.55. SSRC currently provides mainly internal advice to the FSA and the other FSA SACs about how social science evidence is gathered, commissioned and used. Recent Committee work has included work to inform the FSA's new strategic plan, the FSA social survey: Food and You and developing the strategic partnership with the Economic and Social science Research Council (ESRC).

2.56. Evidence gathered included that;

- the Committee works and collaborates well with other FSA SACs (ACMSF, COT) including on social science issues;
- the Committee members have specialist knowledge and a diversity of expertise which is not duplicated in other SACs and is reviewed annually;
- the secretariat is effective and meetings are well received;
- the future role of the Committee needs to be properly defined to focus on strategic advice for FSA to inform delivery of its strategic plan and science and evidence strategy.

2.57. Internal and externally gathered views indicated a very clear future demand and need for social science expertise to be used by FSA to deliver its strategic priorities, particularly to help it understand and address issues such as those around vulnerability, assessing economic benefits and impacts, and supporting behaviour change for consumers and businesses and in regulation. The SSRC should focus its future work programme on providing strategic advice, scientific insight and challenge which will inform FSA in delivery of its strategic objectives and help it understand its impact, with clear links to the FSA Strategic Plan and its priorities.

2.58. The question of whether social science expertise should be embedded within each FSA SAC or remain separate was explored. The majority view was to keep the SSRC as a separate Committee but to ensure its key future strategic priorities provide applied scientific advice on how FSA can use social science to implement its strategy. FSA should take the opportunity to reflect on the future composition and the name of the Committee. Some suggestions made during the review for other disciplines to be included were a statistician, an economist and a social anthropologist. A future name for the Committee could be the Applied Strategic Science Committee which should also broaden its external focus and work, where

possible, with other social science experts across Government and internationally to develop and share opinions such as the Defra social science panel.

#### **p. Assessment of Form for the Social Science Research Committee (SSRC)**

- 2.59. SSRC is an Advisory Non-Departmental Public Body. The review considered the following alternative delivery models for SSRC functions:
- 2.60. **Bring the functions in house** - On the evidence provided, this option was considered the most appropriate for the SSRC. As discussed above it is already operating as an internal advisory committee for FSA. The functions of the Committee would continue to follow the guidance on provision of scientific advice to Government and operate openly and transparently. It would not be cost-effective to deliver SSRC functions using FSA staff. There is also a risk that a fully commercial arrangement, with experts acting as consultants, could affect real or perceived independence and objectivity of advice provided.
- 2.61. **Contract with the experts** - This could deliver the same results, but is unlikely to be a more cost-effective model as it would require a similar membership and secretariat functions. Costs for the current Committee i.e. recruitment of members, travel costs, and remuneration for members are currently £160-230 per day and are much lower than current commercial consultancy rates (£1,000-1,500 per day). There is also a risk that a fully commercial arrangement, with experts acting as consultants, could affect real or perceived independence and the objectivity of advice.
- 2.62. **Merge with similar bodies** - The evidence gathered from OGD's did not indicate similar SACs within Defra or DH/PHE. However, evidence collected suggested that SSRC in future should link, where possible, with other social science expertise used across Government (Defra, CO, PHE/DH).
- 2.63. **Continued Delivery as an ANDPB** - SSRC is not considered appropriate for ANDPB status. It does need to consist of high-level specialist scientific expertise independent of FSA but provides a specific internal strategic function for FSA to support FSA's application of social science insights in relation to delivery of the FSA Strategic Plan and Science and Evidence Strategy. SSRC should move to become an expert committee of FSA, reflecting its focussed role in advising FSA and the likely volume and nature of its work.

**Recommendation 4:** FSA should ensure that the Social Science Research Committee (SSRC) provides clear evidence of its impact, through a work programme that focuses on strategic advice and challenge which will help the FSA to apply the latest social science insights effectively to deliver its strategic objectives and understand their impact. The SSRC should become an expert committee of the FSA, reflecting its future focus on advising the FSA and the likely volume and nature of its work.

## 3. Stage 2 Report

### a. Governance and Operation of the SACs

3.1. The six SACs under review all follow the Code of Practice for Scientific Advisory Committees (CoPSAC<sup>11</sup>) and the FSA Good Practice Guidelines for Scientific Advisory Committees<sup>12</sup>. They all work in an open and transparent manner with meetings held in open session (except where commercially sensitive material is discussed) with meeting agendas, minutes and annual reports published on the relative websites<sup>13</sup>. The SACs (except the GACS) all play a role in setting their own agenda, with their secretariats, through pro-actively monitoring emerging developments in their subject areas and responding to FSA and OGD requests for advice. Further detail on Governance can be found in Annex G of the report and on the FSA website at [www.food.gov.uk/science/ouradvisors](http://www.food.gov.uk/science/ouradvisors).

### b. Conflicts of Interest

3.2. Stakeholders agreed that in general good practice as laid out in CoPSAC is followed by the SAC's, which includes declarations of interest provided openly on websites and at open meetings. Although the SACs publish and maintain declarations of members' interests on their websites, the extent to which members declared potential conflicts of interest (COI) at the start of their meetings was observed to be variable.

3.3. The wider environment around COI has changed, with external perceptions around the extent to which different types of interests should disqualify or restrict participation in decision making variable. The FSA needs to continue to access relevant expertise and to ensure that good corporate governance practices are followed in maintaining and updating the recording of members' declarations of interest, by the FSA, Committee chairs and members and Secretariats managing any potential conflicts in a consistent and transparent manner.

3.4. The review recommends that FSA should revise its current guidelines on interests for SACs and their Chairs to ensure they remain clear and fit-for-purpose for the current and future working environment of the committees, considering other available models in use across Government e.g. within HSE and ensuring that its SACs routinely and openly follow the revised guidance.

**Recommendation 5:** FSA should update its approach and current guidance on conflicts of interest (COI) including considering other models in use across Government nationally and internationally and their efficacy in protecting consumer interests and ensure that its SACs consistently follow the revised guidance.

### c. Management of risk assessment options

3.5. The review identified the importance of the sponsoring department(s) or OGDs seeking risk assessment and other advice from the SACs to ensure that they frame

<sup>11</sup> <https://www.gov.uk/government/publications/SACscientific-advisory-committees-code-of-practice>

<sup>12</sup> [http://www.food.gov.uk/sites/default/files/mnt/drupal\\_data/sources/files/multimedia/pdfs/goodpracguide.pdf](http://www.food.gov.uk/sites/default/files/mnt/drupal_data/sources/files/multimedia/pdfs/goodpracguide.pdf)

<sup>13</sup> <http://www.food.gov.uk/science/ouradvisors>

questions for the SACs appropriately. FSA should ensure that there is an appropriate iterative dialogue with its Committees and that there is a functional separation between risk assessment and risk management, as recognised in the Working Principles for Risk Analysis for Food Safety for Application by Governments and adopted by Codex Alimentarius in 2007 (sections 16-29 and 30-39)<sup>14</sup>. One of the benefits of better communication and of an iterative dialogue would be to support assurance on the use of SAC advice in risk management.

- 3.6. In particular, FSA should ensure that questions and requests to SACs are clear, appropriate and proportionate to ensure that risk assessment and other outputs are useful. FSA should also provide an effective and transparent dialogue throughout the process so that SACs can identify and assess risks associated with different risk management options, for example if new or unintended consequences of different risk management options emerge.
- 3.7. FSA should develop a policy-led internal process, to provide a focus for its SAC function which will deliver priorities for requests for SAC advice and promote early engagement, coordination and prioritisation of work (including with OGDs as further explored in recommendation 7). This needs to ensure FSA can take a view of the needs for advice across the SACs (including from OGDs) and other sources of advice, to ensure it can identify, prioritise and deliver its advice in the most effective and efficient way and provide assurance that all its SACs advice is fit-for purpose.
- 3.8. This can build on or ensure the effective application in practice of the FSA's 'Framework for dialogue between FSA and the SACs'<sup>15</sup>.
- 3.9. Consideration should also be given to FSA providing a regular feedback loop to the SACs on how their scientific advice is used; this was clearly evidenced in ACNFP and COT where specific dossiers or opinions are reviewed or produced to meet European timetables.

**Recommendation 6:** To ensure that SACs' advice addresses appropriate issues for FSA and across Government, in ways which optimise its relevance and impact and the transparency of its use in risk management, FSA should ensure appropriate iterative dialogue with its SACs, including through effective application of its 'Framework for dialogue between FSA and the SACs'.

#### **d. Improving internal and external communication on science**

- 3.10. The SACs provide a core of high-level scientific expertise that FSA can be used to provide risk assessment (and expert advice in other areas) to inform its policy making in food. The review identified that FSA could add value to this expertise in a number of ways; by utilising a series of wider groups and networks (including OGD SACs), co-opting experts to work on specific issues and fostering a wider and more diverse discussion to help how the SACs set their forward agendas and work-plans. FSA could also consider hosting an annual conference on food which would also draw on a number of diverse backgrounds and stakeholders and could do more to ensure that the impact of SAC advice on policy

<sup>14</sup> <http://www.codexalimentarius.org>

<sup>15</sup> <http://www.food.gov.uk/science/sci-gov/commswork/sac-dialogue>.



development and operations is routinely reviewed and openly publicised.

- 3.11. Generally, there was strong evidence collected during the review that the SACs interact and work with a number of other SACs across OGDs. However, improvements could be made through the early sharing of agendas and papers with OGDs, particularly pre meetings, to ensure that any grey areas or overlaps are identified and taken into account during subsequent Committee discussions. The sharing of opinions which overlap with OGDs should be discussed between secretariats, before release, to ensure that a common position is established. Secretariats should work to ensure close and regular contact is maintained with all other relevant OGD secretariats to promote and maintain efficient, effective and timely working in future. This could simply happen via a recorded checklist to ensure all relevant OGDs and their SACs are engaged and have the opportunity to comment on agendas and papers prior to meetings.
- 3.12. When requests are made for advice from an FSA SAC, there must be clear messaging from the government organisation as to the request being made, and from the SAC secretariat as to whether advice can be given and, if not, it should be made clear why the request is not appropriate or cannot be fulfilled (for example if timescales do not allow or it is outside the SAC's remit).
- 3.13. The benefit of SAC chairs meeting on a regular basis was identified as being particularly important (currently through the GACS) to share work plans and experience. FSA should explore how this could work in future. FSA SAC Chairs should meet, potentially virtually, on a biannual basis to share ideas and discuss annual work plans. One meeting could comprise of only the FSA SAC chairs with the second possibly including all OGD SACs that have an interest in food, including the recently created Defra Chairs group.

**Recommendation 7:** Communication should be strengthened between the SACs and the wider external scientific, Government, customer and stakeholder communities including other Government Departments and their Committees to ensure the process for using the SACs is efficient and effective and that aligned strategies and consistent advice is provided for consumers.

#### **e. Streamlining new ways of working**

- 3.14. The support and expertise provided by the FSA secretariats was praised enormously during the evidence gathering for the review. It was noted that the amount of Secretariat resource provided does vary considerably between Committees for a number of reasons including the number of annual SAC meetings and the amount of sub-groups. There was also strong evidence that the cost to FSA of its Committee expertise provides significant value for money (as discussed in Stage 1).
- 3.15. A number of comments were made during the review process and at SAC meetings about the increasing demands on members' time and natural fluxes in secretariat resource. There was a great willingness from members to provide advice within the timeframes set by FSA and a strong recognition that smarter ways of working, including embracing new technologies such as skype and

webinar, will be required to continue to provide the level of input from Committee members and meet the challenge of efficiencies within future secretariat support. It is vital that a balance is maintained and members and secretariats do not become overburdened.

- 3.16. There were a number of positive suggestions on how resource efficiencies could be made in future including; cross committee working including utilising those in OGDs, using models from OGDs such as use of interns (PhD students), using professional societies or research institutes to do literature searches or short reviews on specific or emerging issues, secretariats could produce streamlined minutes which only capture the main outcomes of discussions.
- 3.17. The FSA should also consider the introduction of a common approach for secretariat functions and processes, including centralisation of policy requests from FSA or OGDs across the UK, for SAC advice (building on recommendation 7). There is a potential for the Secretariats to use the internal FSA programme our ways of working (OWOW) to create an in-house process for more streamlined, efficient and effective central secretariat function and to set up regular secretariat forums.
- 3.18. Future work could extend the current SSRC register of experts to include other disciplines to help the FSA to build capacity for r work. This may also help to streamline membership of committees to enable more focussed groups that can draw on additional specific expertise when required from the expanded register of experts and OGD SACs (as discussed in recommendation 7). Additionally, this may help to encourage and mentor other scientists to provide or consider providing advice to Government. This could include schemes to provide work in-house for academics to gain experience of working within Government.
- 3.19. These suggestions are by no means exhaustive and there may be other opportunities to provide further efficiencies and to help ensure the future effective functioning and use of resource for the SACs and secretariats.

**Recommendation 8:** FSA should work through its secretariats and Chairs (both with individual SACs, as a group and with OGDs) to consider joint working, using new tools and technologies, external expertise and other means to make efficiencies (including cost savings) that can be used to make the best use of members' and secretariats expertise and time and help develop FSA staff and Committee members for the future.

## **Annex A - Current Function, Composition and Cost of FSA Scientific Advisory Committees**

### **The Advisory Committee on Toxicity (COT)**

The Advisory Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment provides advice to FSA and across Government (and subsequently internationally) on the toxicity of chemicals in food, consumer products and the environment which consumers may be exposed to.

COT currently has 18 members including the Chair. Each member is appointed by Ministers for terms of three or four years, and may if reappointed serve a maximum of 10 years. The current Chair has been in post since 1 April 2015.

Members are independent and are selected for their scientific expertise. The committee currently consists of experts in pharmacology (biochemical, neuropharmacology, pharmacokinetics, and clinical), pathology, toxicology, molecular biology, drug metabolism, environmental health, allergy and immunology. Two members are selected for public interest and one member is directly employed in industry.

Working papers and minutes are published on the COT website and meetings are held in open session (except where data are confidential through being commercially sensitive or pre-publication). The COT website has approximately 5,942 hits per annum.

COT assessors, who are representatives of other government departments and bodies with an interest in COT's business (Public Health England, Department of Health, Health and Safety Executive, Veterinary Medicines Directorate, Food Standards Scotland), may attend and participate in COT meetings and are consulted on relevant issues. A list of the government departments who may consult and use COT's advice is presented as part of the committee terms of reference on their website at <http://cot.food.gov.uk>.

The committee meets about seven times a year, depending on business. Some of COT's routine business is conducted between meetings by e-mail.

Members are supported by a joint secretariat provided by the FSA and Public Health England (PHE). The secretariat provides members with comprehensive background information and briefing papers upon which rational decisions can be made.

COT has an annual cost of about £35,000, made up of fees and travel expenses and costs of recruiting new members. FSA support is estimated at £155,000 a year.

### **The Advisory Committee on the Microbiological Safety of Food (ACMSF)**

The Advisory Committee on the Microbiological Safety of Food assesses the risk to humans of microorganisms which are used, or occur, in or on food, and to advise the FSA on any matters relating to the microbiological safety of food.

ACMSF currently has 15 members including the Chair. Each member is appointed by Ministers for terms of three or four years, and may if reappointed serve a maximum of 10 years. The current Chair has been in post since 2006.

Members are independent and are selected for their scientific and technical expertise. The committee currently consists of experts in epidemiology, microbiology (food, clinical, industry, public health and communicable disease), food safety and risk assessment modelling, virology, veterinary public health, environmental health and catering. One member is selected for public interest and two members are directly employed in industry.

Working papers and minutes are published on the ACMSF website and meetings are held in open session (except where data are confidential through being commercially sensitive or pre-publication). The ACMSF website has approximately 2,914 hits per annum.

The committee meets three times a year, and has approximately 7 sub-group meetings, depending on business. Some of ACMSF's routine business is conducted between meetings by e-mail. The committee has a large audience at their open meetings, provides advice to government bodies (DH, PHE and Defra) and works jointly with other committees when requested (COT, Pesticides Residues in Food Committee (PRiF)).

Members are supported by a secretariat provided by the FSA. The secretariat provides members with comprehensive background information and briefing papers upon which rational decisions can be made.

ACMSF has an annual cost of about £23,000, made up of fees and travel expenses and costs of recruiting new members. FSA support is estimated at £125,000 a year.

### **Social Science Research Committee (SSRC)**

The Social Science Research Committee (SSRC) provides advice to the FSA about how it gathers and uses social science evidence.

SSRC currently has 12 members including the Chair. Each member is appointed by Ministers for terms of three or four years, and may, if reappointed, serve a maximum of 10 years. The current Chair has been in post since 2011.

Members are independent and are selected for their scientific and technical expertise and current committee expertise includes Government social science and statistics, psychology, geography, sociology, environmental health, public health nutrition, social anthropology, political and environmental economics, and agricultural and food econometrics. Two members are selected for public interest and none are directly employed in industry.

Typically, SSRC meets twice per year and provides advice to the FSA about how it gathers and uses social science evidence and advice on emerging issues. SSRC is viewed to have quite a different role in advising FSA on social science wider than just risk assessment. The Committee, in the last year, has provided significant input to peer review of work for FSA, including across the UK. Members also attend working, advisory and sub-group meetings and ad hoc FSA activities as required.

Meeting papers and minutes are published on the SSRC website and meetings are held in open session. The SSRC website has approximately 1,192 hits per annum

Members are supported by a secretariat provided by the FSA. The secretariat provides members with comprehensive background information and briefing papers upon which rational decisions can be made.

SSRC has an annual cost of about £28,000, made up of fees and travel expenses and costs of recruiting new members. The secretariat is provided by FSA staff that work part-time on SSRC support. FSA support is estimated at £42,000 a year.

### **The Advisory Committee on Novel Foods and Processes (ACNFP)**

The Advisory Committee on Novel Foods and Processes is an independent body of scientific experts that advises the central authorities responsible in England, Scotland, Wales and Northern Ireland respectively on any matters relating to novel foods (including genetically modified foods) and novel processes (including food irradiation).

The Committee carries out safety assessments of any novel food or process submitted for approval under the EC novel food regulation. GM foods are subject to approval under a separate

regulation which involves centralised risk assessments, which are the responsibility of the European Food Safety Authority (EFSA). Nevertheless, the Committee still has a role in advising the Food Standards Agency on GM foods - for example by contributing to EFSA's risk assessments or by advising the FSA on other GM issues.

ACNFP currently has 14 members including the Chair. Each member is appointed by the Chair of the FSA for terms of between two and four years, and may if reappointed serve a maximum of 10 years. The current Chair has been in post since December 2009.

Members are independent and are selected for their scientific and technical expertise. The committee currently consists of a Chair, who is also an expert in global food security and soil science and experts in human nutrition, microbiology, mycology, allergenicity, food industry, toxicology and genetically modified organisms. There are three lay members, two of whom are consumer affairs representatives and the third is an ethicist. One member of the Committee is directly employed by the food industry.

Minutes are published on the ACNFP website and meetings are held in closed session as the data that they review are confidential through being commercially sensitive or pre-publication. The ACNFP website has approximately 6,633 hits per annum.

The committee usually meets six times a year, and its main role is to provide the FSA with advice on applications submitted for an authorisation under the Novel Food Regulations (EC) 258/97 from businesses who wish to introduce novel food products into the European market. The committee generally reviews 15-20 applications per annum.

Members are supported by a secretariat provided by the FSA. ACNFP has an annual cost of about £27,000, made up of fees and travel expenses and costs of recruiting new members. FSA support is estimated at £36,000 a year.

### **The Advisory Committee on Animal Feed (ACAF)**

The Advisory Committee on Animal Feed (ACAF) advises FSA, and Agriculture Ministers throughout the UK, on the safety and use of animal feed in relation to human health. However, it also covers animal health aspects and a wide range of contemporary issues including advice on the UK negotiating line on new European Union proposals, covering a wide range of issues including compound feed, feed additives, contaminants and various animal feed ingredients including genetically modified organisms (GMOs), labelling and information for purchasers of animal feed.

ACAF currently has 14 members including the Chair. ACAF is an UK-wide committee and is made up of independent experts who were appointed by UK agriculture Ministers and the Food Standards Agency (FSA). Each member is appointed by Ministers for terms of three years, and may if re-appointed serve a maximum of 10 years. The current Chair has been in post since 2008.

Members are appointed for their individual expertise and experience and include expertise in crop and agricultural research, trading standards, the feed and farming industry, toxicology, microbiology, biotechnology, animal nutrition, and veterinary science and consumer affairs. There is one lay member on the Committee and one member employed directly by industry.

ACAF is committed to a policy of openness and publishes its agendas, minutes, reports and most of its papers on its website. The Committee meets three times a year, one of those meetings is held outside of London and provides advice and opinion on the safety and use of animal feed and practices including new technologies. The ACAF website has approximately 3,291 hits per annum.

Members are supported by a secretariat provided by the FSA. ACAF has an annual cost of about £26,000, made up of fees and travel expenses and costs of recruiting new members. FSA support is estimated at £29,000 a year.

### **General Advisory Committee for Science (GACS)**

The General Advisory Committee on Science (GACS) is an independent advisory committee, which provides advice and challenge to the FSA Chief Scientific Adviser and the FSA Board on the FSA's governance and use of science. The Committee's work includes horizon scanning, science governance, developing good practice and informing science priorities.

GACS currently has 14 members including the Chair. The GACS comprises a directly-appointed Chair, four directly-appointed expert members, two directly-appointed lay members, and the Chairs of the seven scientific advisory committees that advise the Agency, who are members of GACS in an ex officio capacity. The current Chair has been in post since 2007. No current members are directly employed by industry.

GACS meets twice per year and provides independent advice on the FSA's governance and use of science. The committee provides a key role for FSA and provides a forum for all Chairs of the principal SACs which advise the FSA, to meet and provide advice and critical challenge to the FSA's Chief Scientific Adviser, including on the development and implementation of FSA's science, evidence and information strategy. The committee also may form working groups and meet to work on specific issues for FSA as requested. The GACS website has approximately 761 hits per annum.

Members are supported by a secretariat provided by the FSA. GACS has an annual cost of about £10,000, made up of fees and travel expenses and costs of recruiting new members. FSA support is estimated at £45,000 a year.

## Annex B - Review Process; Project Board Membership; Advisory Group Membership; Review Costs

### Process and review cost

The start of the review was announced by a Written Ministerial Statement to both Houses of Parliament on 10 September 2015. In accordance with Cabinet Office guidance that Reviews should be proportionate to the size of the body, the review followed a 'light touch' approach with evidence gathered simultaneously for all six committees at both stages of the review.

Dr Penny Bramwell (FSA Director of Science, Evidence and Research) was the Senior Review Sponsor (SRS) and chaired the Project Board, which oversaw delivery of the Review. The Project Board will include members with an interest in the work of the SACs from outside FSA to ensure an external perspective. Professor Guy Poppy (FSA Chief Scientific Adviser) acted as sponsoring FSA Director and chaired an Advisory Group of experts from outside FSA that provided informed, independent challenge and advice, to ensure the Review took an open-minded and robust approach.

Evidence was gathered through desk-based research, interviews with key stakeholders and a public Call for Evidence. Further details can be found in Annexes E-G.

<b>Project Board Membership</b>	
Penny Bramwell (Chair)	Senior Review Sponsor
Georgina Collins	Head of Chemical Safety Policy, FSA
Simon Dwyer	FSA Finance Business partner, FSA
Will Creswell	Head of Consumer Protection and Commercial Support, FSA
Jacqui McElhiney	Head of Food Protection Science and Surveillance Branch Food Standards Scotland
Jorge Martin-Almagro	Head of Consumer Protection FSA Wales
Liz Olney	Head of Operations Assurance, FSA
Dr Patrick Miller	FSA SAC Secretariat Representative
Lucy Foster / Laura Eden	Defra
David Dipple/David Malcolm	Department of Health COM Review Representatives

<b>Advisory Group Membership*</b>	
Professor Guy Poppy (Chair)	FSA Chief Scientist
Professor Paul Wiles	FSA Board Member
Dave Bench	Director of Chemical Regulation, Health and Safety Executive
Peter Midgley	Director of Policy and Science, Food Standards Scotland
Marta Hugas	Head of the Biological Contaminants and Hazards Unit, European Food Safety Authority
Penny Bramwell	Senior Review Sponsor
Susan Pryde	Lead Reviewer
David Dipple/David Malcolm	Department of Health COM Review Representatives

Note: Tariq York and Lexi Rees from Cabinet Office will provide advice to the lead reviewer and Miles Parker from Centre for Science and Policy at University of Cambridge will help to provide critical appraisal of the final report.

\* The Advisory Group was designed to provide constructive challenge to the work of the review and not to represent all stakeholders with an interest in the six SACs under review.

### **Review Costs**

The Review was led by Dr Susan Pryde, seconded from Food Standards Scotland (FSS) to the FSA for the duration of the Review at an approximate cost of £10,000 (total travel and subsistence costs).

No additional fees were paid to members of the SACs, their Secretariats, the Project Board or Advisory Group.



## Annex C - Initial Written Ministerial Statement of 21 September 2015

**Made by: Jane Ellison (The Parliamentary Under Secretary of State, Department of Health)  
HCWS183**

I am today announcing the start of the Triennial Review by the Food Standards Agency (FSA) of the six Scientific Advisory Committees (SACs) for which the FSA is the sole or lead sponsor. The six Committees are: the Advisory Committee on Animal Feedingstuffs (ACAF); the Advisory Committee on the Microbiological Safety of Food (ACMSF); the Advisory Committee on Novel Foods and Processes (ACNFP); the Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT); the General Advisory Committee on Science (GACS); and the Social Science Research Committee (SSRC).

The Triennial Review programme ensures that all Government departments review their non-departmental public bodies on a regular basis.

Reviews are conducted in two stages. The first stage will examine the continuing need for the functions provided by each Committee, and whether the organisation's form, including operating at arm's length from government, remains appropriate. If the outcome of this stage is that delivery should continue, the second stage of the review will assess whether the bodies are operating efficiently and in line with the recognised principles of good corporate governance.

The FSA is reviewing all six bodies as a cluster, which will provide for a more efficient review process, and allow the review to consider any gaps or overlaps in the Committees' functions and opportunities for efficiencies in their operation.

The FSA will consult widely with relevant stakeholders, including: the Select Committees on Science and Technology (Commons and Lords), on Health, and on Environment, Food and Rural Affairs; Government Departments and Agencies; the devolved Administrations; and others with an interest in the work of the Committees. The FSA will also launch an open call for evidence so that all those with an interest can contribute.

I will inform the House of the outcome of the review when it is completed and the findings of the review will be published.

## Annex D- Open Call for Evidence Questions

1. Is there a continuing need for the functions provided by the Committee(s) to the Food Standards Agency (or to other parts of government including the devolved administrations in Wales, Northern Ireland and Scotland)?
  - What would the implications be of stopping the Committee(s)' functions?
  - Is providing the functions a justifiable use of public money including the relevance, quality and fitness-for-purpose of their outputs for FSA and for others who may commission or use the Committee(s)' advice?
  - Are there any functions that could be stopped or undertaken differently?
2. How well is the Committee(s) currently performing and delivering their functions?
  - How effectively are issues identified, prioritised and solved?
3. The Committees are currently advisory Non-Departmental Public Bodies of the Food Standards Agency. Do you think an alternative organisational structure would improve or be detrimental to delivery of the functions you feel are necessary? Which of the following organisational forms would you support:
  - **Become a departmental expert committee of the Agency:** could a function be more efficiently delivered if the Committee(s) moved into the FSA as departmental expert committees? If you have had experience of interacting with an expert committee of another Department, has its status affected your perception/interaction with that committee?
  - **Merge with other Committee(s):** could a function be better delivered by the Committee(s) if it were merged with other Committee(s)? In this scenario, should the merged body be in the form of an ANDPB or as a departmental expert committee?
  - **Continued delivery as an ANDPB:** do its activities need to be seen to be delivered with absolute political impartiality? Does the Committee(s) need to act independently of Ministers to establish facts and/or figures with integrity?
  - Other<sup>16</sup>:
4. How well do you think the Committee(s) interact and collaborate with the other SACs in this Review?
  - Do you have any comments on the relationship between the six committees?
  - Are there any overlaps or important gaps between the Committee(s)' functions?
5. How well do you think that the Committee(s) interacts with other organisations across the food and public health sectors, wider government, and elsewhere (including with other SACs outside this review)?
  - a. Should the Committee(s) be working more closely with other organisations?
  - b. Are potential users of the Committee(s)' services aware of their existence and responsibilities? How effective is the Committee(s) at communications and

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<sup>16</sup> For a full checklist of delivery options, please refer to Annex A of the Guidance on Review of Non-Departmental Public Bodies ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/332147/Reviews\\_Guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332147/Reviews_Guidance.pdf)).

engagement with those commissioning and using its advice and with other stakeholders?

6. Do you think the Committee(s)' expertise is utilised effectively? Do you feel that appropriate work is given priority when resources are limited?
7. Do you consider the Committee(s)' governance appropriate (membership and structure, recruitment, appointment, development, and retention of members processes, secretariat support, etc.) to best support their functions?

(You may wish to consider the following points in responding to this question, but please do not feel constrained to these points).

- a. Do the Committee(s) comply with the following guidance sets:
  - i. Code of Practice for SACs (CoPSAC) and Principles of Scientific Advice to Government, and the FSA Good Practice Guidelines for SACs<sup>17</sup>.
  - ii. FOI 2000<sup>18</sup>? And the Public Records Act 1958<sup>19</sup> and 1967<sup>20</sup>?
  - iii. The Equality Act 2010 (Specific Duties) Regulations 2011<sup>21</sup>?
8. Do you think the Committee(s) operates in an open, transparent, accountable and responsive way?
9. Are there other organisations either nationally or internationally which could be used to benchmark the Committee(s)' performance and outputs? Which benchmarks are most relevant and why?

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<sup>17</sup> These documents provide guidance on some of the specific issues covered in the subsequent lines of enquiry;  
<https://www.gov.uk/government/publications/scientific-advisory-committees-code-of-practice>  
<https://www.gov.uk/government/publications/scientific-advice-to-government-principles>  
<https://www.food.gov.uk/science/sci-gov/commswork/goodpracticeguidelinessacs>

<sup>18</sup> <http://www.legislation.gov.uk/ukpga/2000/36/contents>

<sup>19</sup> <http://www.legislation.gov.uk/ukpga/Eliz2/6-7/51>

<sup>20</sup> <http://www.legislation.gov.uk/ukpga/1967/44>

<sup>21</sup> <http://www.legislation.gov.uk/uksi/2011/2260/contents/made>

## Annex E – Summary of Open Call for Evidence Responses

<p>1. Is there a continuing need for the functions provided by the Committee(s) to the Food Standards Agency (or to other parts of government including the devolved administrations in Wales, Northern Ireland and Scotland)?</p> <p>a) What would the implications be of stopping the Committee(s)' functions?</p> <p>b) Is providing the functions a justifiable use of public money including the relevance, quality and fitness-for-purpose of their outputs for FSA and for others who may commission or use the Committee(s)' advice?</p> <p>c) Are there any functions that could be stopped or undertaken differently?</p>	<ul style="list-style-type: none"> <li>• 13 of the 14 open call respondents thought yes with 1 don't know.</li> <li>• Positive support from most respondents that there would be significant gap in the scientific and technical advice to consumers, business and enforcers on food and feed safety, supply and production (including novel and emerging technologies) if the SACs did not exist.</li> <li>• Many identified a requirement for the UK, in future, to be able to respond to EU, CODEX and WHO debate and credible, independent evidence provision.</li> <li>• Two respondents suggested that ACNFP functions could in future be provided as a charged service for industry for advice and application assessment.</li> <li>• SSRC and GACS were identified as only addressing internal FSA issues in one response.</li> <li>• ACAF's function was identified as required by a number of supportive comments from two respondents. However, they were identified by four respondents as too narrow in their focus, not good at prioritisation, average to poor in collaboration and very poor on governance.</li> </ul>
<p>2. How well is the Committee(s) currently performing and delivering their functions?</p> <p>a) How effectively are issues identified, prioritised and solved?</p>	<ul style="list-style-type: none"> <li>• Most respondents agreed that all the Committees performed well. Three respondents thought that ACMSF performed very well. One response for ACNFP and ACAF thought that they performed well, however, two respondents through ACNFP and ACAF's performance was average.</li> <li>• On prioritisation most respondents identified good forward work plans with priorities on reactive and emerging issues which were managed well. Work was identified by some respondents in ACMSF as excellent and widely used by industry to improve business practice and in ACNFP as used by other MS because of the quality of the expertise and transparency of the process.</li> </ul>
<p>3. The Committees are currently advisory Non-Departmental Public Bodies of the Food Standards Agency. Do you think an alternative organisational structure would improve or be detrimental to delivery of the functions you feel are necessary? Which of the following organisational forms would you support:</p> <p>a) <b>Become a departmental expert committee of the Agency:</b> could a function be more efficiently delivered if the Committee(s) moved into the FSA as departmental expert committees? If you have had experience of interacting with an expert committee of another Department, has its status affected your perception/interaction with that committee?</p> <p>b) <b>Merge with other Committee(s):</b> could a function be better delivered by the Committee(s) if it were merged with other Committee(s)? In this scenario, should the merged body be in the form of an ANDPB or as a departmental expert committee?</p> <p>c) <b>Continued delivery as an ANDPB:</b> do its</p>	<ul style="list-style-type: none"> <li>• All the respondents who answered this question (10/14) supported that the SACs remain as ANDPBs. It was seen that independent science based advice was critical for evidence based policy making and needed to be free from political interference. This was viewed as important for consumers and industry to give greater confidence in the advice. Those who didn't answer had no opinion on their future structure.</li> </ul>

<p>activities need to be seen to be delivered with absolute political impartiality? Does the Committee(s) need to act independently of Ministers to establish facts and/or figures with integrity?</p> <p>d) Other<sup>22</sup>:</p>	
<p>4. How well do you think the Committee(s) interact and collaborate with the other SACs in this Review?</p> <p>a) Do you have any comments on the relationship between the six committees?</p> <p>b) Are there any overlaps or important gaps between the Committee(s)' functions?</p>	<ul style="list-style-type: none"> <li>The majority of respondents thought the SACs in this review collaborated well with each other. Two thought ACMSF and one thought ACNFP collaborated very well and two thought ACNFP and ACAF collaboration was average.</li> <li>Generally the SACs were thought to collaborate well with each other and no evidence gaps were identified.</li> </ul>
<p>5. How well do you think that the Committee(s) interacts with other organisations across the food and public health sectors, wider government, and elsewhere (including with other SACs outside this review)?</p> <p>a) Should the Committee(s) be working more closely with other organisations?</p> <p>b) Are potential users of the Committee(s)' services aware of their existence and responsibilities? How effective is the Committee(s) at communications and engagement with those commissioning and using its advice and with other stakeholders?</p>	<ul style="list-style-type: none"> <li>The response here was very mixed.</li> <li>Two respondents thought ACMSF collaborated very well with outside organisations one for ACNFP and one for ACAF.</li> <li>Three responses identified ACAF as working well with two responses in this category for the 5 other committees.</li> <li>Two responses identified ACMSF and ACNFP and one for COT, ACAF, GACS and SSRC as average.</li> <li>One response identified ACAF as poor.</li> </ul> <p>Strengths were identified in the SACs:</p> <ul style="list-style-type: none"> <li>working with other organisations on points of overlap;</li> <li>having good websites;</li> <li>having open meetings and publications;</li> <li>advice being open and transparent.</li> </ul> <p>In some comments it was thought that FSA should be communicating the work externally on the SACs behalf, that the SAC work could have more promotion and that public reports should be subject to more external consultation.</p>
<p>6. Do you think the Committee(s)' expertise is utilised effectively? Do you feel that appropriate work is given priority when resources are limited?</p>	<ul style="list-style-type: none"> <li>All responses for the six SACs indicated yes.</li> <li>Generally comments received thought that resources need to be sufficient to allow the priorities, workload and timescales for the SAC advice to happen effectively.</li> <li>ACMSF was viewed as very valuable and heavily relied upon by FSA but questions put to the SAC by FSA were not always prepared properly.</li> <li>An enforcement perspective in advice provided was thought important where possible.</li> </ul>
<p>7. Do you consider the Committee(s)' governance appropriate (membership and structure, recruitment, appointment, development, and retention of members processes, secretariat support, etc.) to best support their functions?</p>	<p>Mixed comments were received on Governance;</p> <ul style="list-style-type: none"> <li>Two responses for ACMSF, one for ACNFP and ACAF indicating this was done very well.</li> <li>Two responses for ACMSF, ACNFP and ACAF. One for GACS, SSRC and COT indicating that this was done well.</li> <li>Two responses for COT, ACNFP, GACS, SSRC and one for ACMSF and ACAF indicating that this</li> </ul>

<sup>22</sup> For a full checklist of delivery options, please refer to Annex A of the Guidance on Review of Non-Departmental Public Bodies ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/332147/Reviews\\_Guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332147/Reviews_Guidance.pdf)).

	<p>was average.</p> <ul style="list-style-type: none"> <li>• One response indicated for ACAF that this was poor.</li> <li>• Multiple comments indicated that recruitment into the SACs should be transparent, open and based on scientific expertise irrespective of whether that comes from industry or not.</li> </ul>
<p>8. Do you think the Committee(s) operates in an open, transparent, accountable and responsive way?</p>	<ul style="list-style-type: none"> <li>• Four respondents for ACMSF and ACAF, two for ACNFP and one for COT, GACS and SSRC indicated yes.</li> <li>• One response for ACAF indicated no.</li> <li>• Comments received included that FSA must set the agenda and questions on emerging issues transparently.</li> <li>• Open meeting should continue and published advice must be very transparent including better promotion of the SACs work.</li> </ul>
<p>9. Are there other organisations either nationally or internationally which could be used to benchmark the Committee(s)' performance and outputs? Which benchmarks are most relevant and why?</p>	<ul style="list-style-type: none"> <li>• Some suggestions were received but all work in different ways from FSA SACs and there were pros and cons to consider for each. e.g. EFSA, FDA (mainly in-house expertise which is very expensive), WHO (not direct advice for Government), FSANZ (parallel reports and outputs) and Japan (seen to be very industry biased).</li> <li>• Generally the FSA model was seen as leading the way in openness and transparency with anyone being able to attend the open meetings and ask questions of the SACs.</li> <li>• As mentioned previously some pointers in comments for improvements can be made.</li> </ul>

## Annex F - Call for Evidence Engagement Summary

<b>Evidence base</b>	
<b>Open Call for Evidence Consultation Period:</b>	<p>Start: 25 September 2015</p> <p>Finish: 09 November 2015</p> <p>1,296 web hits with 992 being unique</p>
<b>Call for Evidence Responses Received:</b>	<ol style="list-style-type: none"> <li>1. Collated response from 9 individuals representing the following organisations: <ul style="list-style-type: none"> <li>• Food and Drink Federation</li> <li>• Which?</li> <li>• Institute of Food Research</li> <li>• DARD</li> <li>• Allergy Action</li> <li>• CATERed Limited</li> <li>• National Food Hygiene Focus Group</li> <li>• Cambridge Food Control Limited</li> <li>• SugaRich Limited</li> </ul> </li> <li>2. 5 Individual responses</li> </ol>
<b>Stakeholder bilaterals:</b>	<ol style="list-style-type: none"> <li>1. Michael Wight, FSA</li> <li>2. Catherine Brown CEO, FSA</li> <li>3. Prof. Guy Poppy, CSA, FSA</li> <li>4. Steve Wearne, FSA</li> <li>5. Georgina Collins, FSA</li> <li>6. Tim Bennett, Chair, FSA Board</li> <li>7. Maria Jennings, FSA</li> <li>8. Liz Olney, FSA</li> <li>9. Will Creswell, FSA</li> <li>10. Penny Bramwell, FSA</li> <li>11. Julie Pierce, FSA</li> <li>12. Catherine Bowles, FSA</li> <li>13. Nina Purcell, FSA</li> <li>14. Sian Thomas, FSA</li> <li>15. Susanne Boyd, FSA NI</li> <li>16. Jacqui McElhiney, Food Standards Scotland</li> <li>17. Jane Horne, Food Standards Scotland</li> <li>18. Peter Midgley, Food Standards, Scotland</li> <li>19. Diane Benford, COT secretariat, FSA</li> <li>20. France Pollitt, COT assessor, PHE</li> <li>21. Prof. Tim Gant, COT assessor, PHE</li> <li>22. Prof. Alan Boobis, COT Chair</li> <li>23. Helen Atkinson, SSRC secretariat, FSA</li> <li>24. Prof. Peter Jackson, SSRC Chair</li> <li>25. Joy Dobbs, SSRC Deputy Chair</li> <li>26. Paul Cook, ACMSF secretariat</li> <li>27. Manisha Upadhyay, ACMSF secretariat</li> <li>28. Prof. Sarah O'Brien, ACMSF, Chair</li> <li>29. Prof. David McDowell ACMSF Deputy Chair</li> <li>30. Patrick Miller, GACS secretariat</li> <li>31. Prof. Colin Blakemore, GACS Chair</li> <li>32. Prof. Colin Dennis, GACS member</li> <li>33. Prof. David Lovell, Chair COM and member of GACS</li> <li>34. Prof. David Philips, Chair COC and member of GACS</li> <li>35. Keith Millar, ACAF secretariat</li> </ol>

	<p>36. Mandy Jumnoodoo, ACAF secretariat 37. Prof. Ian Brown, ACAF Chair 38. Prof. Ian Givens, ACAF Deputy Chair 39. Stephen Wyllie, ACAF/ACMSF assessor, Defra 40. Stephen Johnson, ACNFP secretariat 41. Alison Asquith, ACNFP secretariat 42. Prof. Peter Gregory, ACNFP Chair 43. Camilla Pease, ACNFP Deputy Chair 44. Alison Tedstone, SACN Secretariat, PHE 45. Ann Prentice, Chair SACN 46. David Williams, Defra 47. Neil Leach, Defra 48. Lucy Foster, Defra 49. Chris Jones, Medicines and Healthcare Regulatory Agency (MHRA) 50. Marta Hugas, European Food Safety Authority (EFSA) 51. Craig Lucas, Deputy Chief Scientist, DECC</p>
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## Annex G - Compliance with the Principles of Good Corporate Governance

<b>Principles of Good Governance</b>	<b>Findings from the review</b>
Do the Committees operate in accordance with the guidance set out in the cross-government Code of Practice for SACs (CoPSAC) and Principles of Scientific Advice to Government, and the FSA Good Practice Guidelines for SACs	COT, ACMSF, SSRC, GACS, ACAF and ACNFP all operate with the codes of practice identified.
Are measures including publication of documentation sufficient and effective in ensuring an appropriate level of transparency in SACs' processes and decision making	Yes, all meetings are open, agendas and papers are published on the committee websites unless they are commercially sensitive (ACNFP and COT).
Do SACs inform Parliament and the public of their work in an annual report (or an equivalent publication) proportionate to their roles	Annual reports are published on the committee websites and some are laid in the parliamentary library.
Is there a clear and consistently enforced policy relating to conflicts of interest for SAC members	Yes, FSA have a policy on COI and member's interests are declared on the website and at the beginning of each meeting (although observed to not be consistent). See recommendation 6.
Have the respective Chair and all members of SACs been appointed in accordance with Departmental guidance and the code of practice issued by the commissioners for public appointments	Yes, COT, ACMSF, SSRC, GACS, ACAF and ACNFP all comply with the relevant codes of practice.
Do the terms and conditions of SAC members reflect Cabinet Office guidance.	Yes, COT, ACMSF, SSRC, GACS, ACAF and ACNFP all comply with CO guidance
Do the Chairs and members of SACs allocate sufficient time to discharge their respective responsibilities	Yes, for COT, ACMSF, SSRC, GACS, ACAF and ACNFP and any underperformance (such as lack of attendance at meetings) is addressed as necessary.
Is there a proper induction process for the Chairs and members of SACs	Yes, proper procedures and induction packs exist for COT, ACMSF, SSRC, GACS, ACAF and ACNFP
Is there an annual appraisal of the Chairs and members of SACs.	Yes, annual appraisal of chairs and committees via the FSA CSA and self-assessment and feedback processes in place for committee members.
Is there room for improvement in the processes for recruitment, appointment, development and retention of members, and for succession planning?	Yes, new appointments can take up to six months for a 2 year tenure so this could be improved. In some scientific disciplines, Committees have struggled to recruit replacement members due to the time commitments involved or remuneration offered. See recommendation 9.

Do SACs publish agendas and minutes of their meetings.	COT, ACMSF, SSRC, GACS, ACAF and ACNFP all publish on their website except where commercially sensitive so the documents may be abridged.
Do SACs comply with data protection legislation	Yes, COT, ACMSF, SSRC, GACS, ACAF and ACNFP all comply
Do SACs comply with the FOI 2000? And the Public Records Act 1958 and 1967	Yes, COT, ACMSF, SSRC, GACS, ACAF and ACNFP all comply
Is the support provided by SAC Secretariats adequate, effective and efficient	In general for COT, ACMSF, SSRC, GACS, ACAF and ACNFP yes. Feedback is provided by members and Chairs regularly to the Secretariat. Some work areas may not progress quickly due to lack of members, secretariat time or changing priorities. See recommendation 9.
Are the responsibilities, priorities, and terms of reference of SACs understood by their respective members and their Secretariats	Yes, for COT, ACMSF, SSRC, GACS, ACAF and ACNFP this is part of the induction process.
Are there clear fees and expenses policies for SAC Chairs and members.	Yes, clear guidance from FSA is provide to COT, ACMSF, SSRC, GACS, ACAF and ACNFP on this
Are there clear and enforced rules on activities / employment that SAC members can undertake immediately after leaving the organisation	Yes, through induction process and codes of practice, although not all committees are fully aware. See recommendation 6.
Is there evidence that SACs comply with the public sector equality duty under The Equality Act 2010 (Specific Duties) Regulations 2011	Yes, COT, ACMSF, SSRC, GACS, ACAF and ACNFP must provide this as part of the annual public bodies return.
Is there effective scrutiny of SACs by FSA in the form of: i- regular and proportionate assurance meetings ii- regular and proportionate performance reporting, including annual evaluation iii- clear escalation routes where there are performance issues	Yes, through appraisal of COT, ACMSF, SSRC, GACS, ACAF and ACNFP work by the FSA CSA, publication of annual reports and feedback to members and secretariats.