

TOX/2024/33

Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment

Discussion paper on COT Ways of working – 2

Introduction

1. Following on from the discussions at the May COT meeting [Final Minutes of the 21st May 2024 COT Meeting | Committee on Toxicity \(food.gov.uk\)](#) where the Committee discussed their ways of working with a view to reduce the workload of the Chair, the Secretariat thought that it would be timely to review some other areas of the COT's activities.

2. The aim of this discussion is to ensure that the Committee has a range of outputs that are appropriate for the work that it is undertaking including the planned updating of the COT guidance but also, to promote the Committee's work more widely.

Discussion papers

Citing discussion papers

3. At present, items for discussion are presented to the Committee in the form of a discussion or scoping paper followed, if necessary, by update papers. Once completed, the Committee's views on the majority of items are captured in a final statement or position paper, or, in the minutes of the meeting. All of these outputs are then captured in the Committee's Annual Report.

4. COT discussion papers are currently marked with a header which states "This is a paper for discussion. It does not reflect the final views of the Committee and should not be cited." The aim of this is to ensure that the Committee's final views are

not inferred prematurely from the papers and are taken from the final statement, or the agreed minutes.

5. In addition, although the Secretariat aim to ensure that there are no errors in the discussion papers, this is not guaranteed, and errors are sometimes identified during Committee discussions. These are noted in the minutes and not normally corrected in the discussion papers. Any errors identified are resolved before the statement is drafted. The Committee will see 1-2 drafts of the statement prior to it being signed off by Chair's action. This means that there are additional opportunities to identify any errors.

6. However, there are topics where there is a lot of useful background information in the discussion paper which does not get included either in the minutes or in the final statement or position paper and it would be useful for both the Secretariat and external parties to be able to cite it. For example, the initial discussion papers on plant-based drinks contained detailed information on how the exposure assessment was put together which was not covered in the COT statement as it was too detailed but was useful to include in the draft plant-based drinks report, where the focus was different. The Secretariat have also been contacted on a number of occasions by external parties with regard to possible citation of the papers.

7. With that in mind, Members are asked to consider whether it would be desirable to make the discussion papers more available and, if so, to consider possible alternatives to the current disclaimer that would allow discussion papers to be more citable/useful but without requiring significant additional work to check or correct other than for the errors identified by Members during their discussions or the Chair during sign off.

8. For example: "This is a paper prepared for discussion by the Committee. It does not reflect their final views" is one possibility. If Members were agreeable to this, consideration would also need to be given to how the papers should be cited.

Technical guidance and State of the Science

9. Other topics discussed by the Committee have arisen through horizon scanning or out of a deep dive into an aspect of another topic and are either not appropriate or not a priority to convert into a statement – examples include the recent papers on benchmark dose modelling or novel forms of supplements. One possibility might be to convert these papers into a technical guidance document where the discussion paper would have any identified errors corrected in the document itself and a cover page setting out the Committee’s views, recommendations and any other relevant information.

10. The aim would be to have another type of usable output without having the same level of scrutiny as would be the case for a statement or position paper. The available information would be assembled in a format that could be used without too much additional work from the Secretariat or the Members and without needing to come back to the Committee as all the additional information would be taken from the minutes. This type of document could ultimately form part of the COT guidance package, where it is envisaged that the overarching guidance will be complemented by standalone papers on individual topics as required. A potential template is attached at [Annex A](#).

11. For certain discussion papers a statement is the final intended output for the assessment, and the paper is effectively a review of a topic area. It might therefore be useful to identify such discussion papers as a “state of the science paper” or “topic review” as they will contain useful information in addition to that ultimately included in the statement. This might include topics such as microplastics. A possible template is attached at [Annex B](#).

12. Other agencies publish discussion papers and guidance e.g. titled science and research special topics or advisory reports. Some links are as below:

- [Science and Research Special Topics | FDA](#)
- [Advisory Reports \(epa.gov\)](#)
- [Guidance on the use of the benchmark dose approach in risk assessment \(wiley.com\)](#)

- [State of the science report Health Canada: H164-341-2022-eng.pdf \(publications.gc.ca\)](#)

Horizon scanning

13. At present the COT undertake horizon scanning on an annual basis, usually at the February meeting, where work planned for the year ahead is identified and Members are invited to contribute their ideas for possible topics for future discussion or subjects for workshops.

14. Other SACs take, or are considering taking, different approaches to horizon scanning. For example COC has previously undertaken annual horizon scanning identifying potential topics of relevance for the Committee in much the same way as COT. More recently at each meeting the Committee has considered horizon scanning as a short paper, both outlining the topics of relevance from the annual horizon scan and receiving an update of activities at IARC, EFSA, SCCS and SCHEER along with relevant items from COT and COM.

15. Over the last year or so, COC has been considering a more automated approach searching keywords and working from a broader perspective to identify future emerging issues or insights and whether these are in the short-, medium- or long-term. This process is still in development with further discussion anticipated in Autumn 2024.

16. Feedback from the recent SAC appraisal suggests that Members feel that the horizon scanning process could be improved.

17. Members are asked to consider whether horizon scanning should be more regular, and/or if a more structured approach e.g. (Political, Economic, Sociological, Technological, Legal and Environmental) PESTLE or the Delphi method should be used.

Raising the profile of the Committee

18. The Committee produce a significant amount of high-quality work and it would be useful for this to be better known. To assist with this, Digital Object Identifiers (DOIs) are now being added to reports and final statements/position papers.

19. As part of promoting the work of the Committee this year we have published the Committees work in peer reviewed journals (e.g. [new normal chemical landscape: the future of risk assessment toward optimum consumer safety | Toxicology Research | Oxford Academic \(oup.com\)](#)), we have presented at the British Toxicology Congress various posters including on the maternal diet and turmeric and we have been invited internationally to present the work on New Approach Methodologies.

20. It is hoped that by making discussion papers more accessible and citable potentially developing technical guidance and special science topics papers this will also be promoting the work of the Committee.

Questions for the Committee

21. Members are asked to comment on
- a) Whether it would be appropriate to remove the “Do not cite” heading from discussion papers where appropriate and, if so, what wording might be appropriate?
 - b) Whether preparing technical guidance documents would be useful?
 - c) Whether badging some discussion papers as topic reviews or state of the science would be useful?
 - d) Should Horizon scanning be more frequent and/or take a structured approach?
 - e) Would the Committee be interested in additional information on horizon scanning techniques?
 - f) Any other feedback on the Committee outputs?
 - g) Any additional comments on how the profile of the Committee could be raised?

Secretariat

August 2024

References

[Horizon Scanning | Department of the Prime Minister and Cabinet \(DPMC\)](#)

[The Ten Commandments of Horizon Scanning – Futures, Foresight and Horizon Scanning \(blog.gov.uk\)](#)

FDA Science and Research Special Topics Website: [Science and Research Special Topics | FDA](#)

EPA Advisory Report Website: [A - Z Topic Index | US EPA](#)

EFSA Guidance on benchmark dose modelling website: [Guidance on the use of the benchmark dose approach in risk assessment | EFSA \(europa.eu\)](#)

Annex A to TOX/2024/33

Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment

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Suggested template for technical guidance document.

Secretariat

August 2024



Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment

Title: XXX

Technical Guidance

Summary: summary of the paper/topic covered

COT conclusions: (taken from the minutes)

COT Recommendations: (taken from the minutes)

COT Technical Guidance 01/24 (Number and year)

Discussion paper here:

Annex B to TOX/2024/33

Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment

Discussion paper on COT Ways of working – 2

Suggested template for science review document.

Secretariat

August 2024



Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment

Science and Research Special Topics Report

Title: XXX Discussion paper

Summary: summary of the paper/topic covered

COT Science Report 01/24 (Number and year)

This report has been written by the Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) Secretariat as part COT reviewing activities in providing advice to Government Departments and Agencies on matters concerning the toxicity of chemicals. It may not be considered as an output adopted

by the COT. The COT reserves its rights, view and position as regards the issues addressed and the conclusions reached in the present document.

The findings do not represent the views of the Government Departments and Agencies, and this document does not represent information approved or disseminated by them.

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