

COMMITTEE ON TOXICITY OF CHEMICALS IN FOOD, CONSUMER PRODUCTS AND THE ENVIRONMENT

2014 ANNUAL REPORT OF THE COT

Background

1. Annex A contains the draft text of the COT section of the 2014 Annual report for the Committees on Toxicity, Mutagenicity and Carcinogenicity.
2. Members are invited to agree the text and also to consider how the COT has performed during 2014 against the Good Practice Guidelines for committees advising the Food Standards Agency (FSA). For easy reference, Annex B contains annex 4 of the Annual Report relating to Good Practice Guidelines for Scientific Advisory Committees.

Advice sought from the Committee

3. Members are invited to consider the following questions and to raise any other matters that arise.
 - i. Do Members have any comments on the text of the report in Annex A?
 - ii. Members are invited to comment on the extent to which COT evaluations in 2014 have complied with the Good Practice Guidelines in Annex B, and if appropriate to make suggestions for future improvements.
 - iii. Members are reminded that if they have not already done so to advise the Secretariat of any **changes** to their annual declaration of interests.

**Secretariat
January 2015**

**COMMITTEE ON TOXICITY OF CHEMICALS IN FOOD,
CONSUMER PRODUCTS AND THE ENVIRONMENT**

2014 ANNUAL REPORT OF THE COT

Draft text of the COT section of the report

This draft version will not be published on the COT website at this time.
The finalised report of the COT, COC and COM will be published in due course and
can be found at: <http://cot.food.gov.uk/cotreports/>

**Secretariat
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The Good Practice Guidelines for Scientific Advisory Committees (revised July 2012)
which can be found in any Annual Report from 2006 onwards as Annex 4.

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ANNEX 4 – Good Practice Agreement for independent Scientific Advisory Committees

Revised and updated July 2012

INTRODUCTION

The Government Chief Scientific Adviser's *Guidelines on the Use of Scientific and Engineering Advice in Policy Making*^a set out the basic principles which government departments should follow in assembling and using scientific advice. The key elements are to:

- **identify early** the issues which need scientific and engineering advice and where **public engagement** is appropriate;
- draw on a **wide range of expert advice** sources, particularly when there is uncertainty;
- adopt an **open and transparent approach** to the scientific advisory process and publish the evidence and analysis as soon as possible;
- **explain publicly the reasons for policy decisions**, particularly when the decision appears to be inconsistent with scientific advice; and
- **work collectively** to ensure a joined-up approach throughout government to integrating scientific and engineering evidence and advice into policy making.

The *Code of Practice for Scientific Advisory Committees*^b and the *Principles of Scientific Advice to Government*^c provide more detailed guidance on the operation of scientific advisory committees (SACs) and their relationship with their sponsor Departments.

The Food Standards Agency's Board adopted a **Science Checklist** in 2006 (updated in 2012) that makes explicit the points to be considered in the preparation of policy papers and proposals dealing with science-based issues, including those which draw on advice from the SACs.

These **Good Practice Guidelines** were drawn up in 2006 by the Chairs of the independent SACs that advise the FSA based on, and complementing, the Science Checklist. They were updated in 2012 in consultation with the General Advisory Committee on Science (GACS).

The Guidelines apply to the SACs that advise the FSA and for which the FSA is sole or lead sponsor Department:

- Advisory Committee on Animal Feedingstuffs
- Advisory Committee on Microbiological Safety of Foods
- Advisory Committee on Novel Foods and Processes

^a <http://www.bis.gov.uk/assets/bispartners/goscience/docs/g/10-669-gcsa-guidelines-scientific-engineering-advice-policy-making.pdf>

^b <http://www.bis.gov.uk/assets/BISPartners/GoScience/Docs/C/11-1382-code-of-practice-scientific-advisory-committees.pdf>

^c <http://www.bis.gov.uk/go-science/principles-of-scientific-advice-to-government>

- Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment^d
- Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment^d
- Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment^e
- Social Science Research Committee
- General Advisory Committee on Science

For the SACs with a shared sponsorship the Guidelines apply formally to their advice to the FSA; they may opt to follow them also in advising other sponsor Departments.

All these committees share important characteristics. They:

- are independent;
- work in an open and transparent way; and
- are concerned with risk assessment and/or science governance, not with decisions about risk management.

The Guidelines relate primarily to the risk assessment process since this is the main purpose of most of the SACs. However, the SACs may, where appropriate, comment on risks associated with different risk management options, highlight any wider issues raised by their assessment that they feel should be considered (distinguishing clearly between issues on which the SAC has an expert capability and remit, and any other issues), or any evidence gaps and/or needs for research or analysis.

In addition, GACS and SSRC may advise the FSA on aspects of the governance of risk management, or on research that relates to risk management.

Twenty nine principles of good practice have been developed. However, the different committees have different duties and discharge those duties in different ways. Therefore, not all of the principles set out below will be applicable to all of the committees, all of the time.

The SACs have agreed to review their application of the principles annually and report this in their Annual Reports. Compliance with the Guidelines will also be covered in the annual self assessments by Members and annual feedback meetings between each SAC Chair and the FSA Chief Scientist.

^d Joint FSA/HPA Secretariat, HPA lead

^e Joint FSA/HPA, FSA lead

PRINCIPLES

Defining the problem and the approach

1. The FSA will ensure that issues it asks an SAC to address are clearly defined and take account of stakeholder expectations in discussion with the SAC Secretariat and where necessary the SAC Chair. The SAC Chair will refer back to the FSA if discussion suggests that further iteration and discussion of the task is necessary. Where an SAC proposes to initiate a piece of work the SAC Chair and Secretariat will discuss this with FSA to ensure the definition and rationale for the work and its expected use by the FSA are clear.

Seeking input

2. The Secretariat will ensure that stakeholders are consulted at appropriate points in the SAC's considerations. It will consider with the FSA whether and how stakeholder views need to be taken into account in helping to identify the issue and frame the question for the committee.
3. Wherever possible, SAC discussions should be held in public.
4. The scope of literature searches made on behalf of the SAC will be clearly set out.
5. Steps will be taken to ensure that all available and relevant scientific evidence is rigorously considered by the committee, including consulting external/additional scientific experts who may know of relevant unpublished or pre-publication data.
6. Data from stakeholders will be considered and weighted according to quality by the SAC.
7. Consideration by the Secretariat and the Chair (and where appropriate the whole SAC) will be given to whether expertise in other disciplines will be needed.
8. Consideration will be given by the Secretariat or by the SAC, in discussion with the FSA, as to whether other SACs need to be consulted.

Validation

9. Study design, methods of measurement and the way that analysis of data has been carried out will be assessed by the SAC.
10. Data will be assessed by the committee in accordance with the relevant principles of good practice, e.g. qualitative social science data will be assessed with reference to guidance from the Government's Chief Social Researcher^f.
11. Formal statistical analyses will be included wherever appropriate. To support this, each SAC will have access to advice on quantitative analysis and modelling as needed.
12. When considering what evidence needs to be collected for assessment, the following points will be considered:
 - the potential for the need for different data for different parts of the UK or the relevance to the UK situation for any data originating outside the UK; and
 - whether stakeholders can provide unpublished data.

^f Quality in Qualitative Evaluation: A Framework for assessing research evidence http://www.civilservice.gov.uk/wp-content/uploads/2011/09/a_quality_framework_tcm6-7314.pdf; The Magenta book http://www.hm-treasury.gov.uk/d/magenta_book_combined.pdf

13. The list of references will make it clear which references have been subject to external peer review, and which have been peer reviewed through evaluation by the Committee, and if relevant, any that have not been peer reviewed.

Uncertainty

14. When reporting outcomes, SACs will make explicit the level and type of uncertainty (both limitations on the quality of the available data and lack of knowledge) associated with their advice.
15. Any assumptions made by the SAC will be clearly spelled out, and, in reviews, previous assumptions will be challenged.
16. Data gaps will be identified and their impact on uncertainty assessed by the SAC.
17. An indication will be given by the SAC about whether the evidence base is changing or static, and if appropriate, how developments in the evidence base might affect key assumptions and conclusions.

Drawing conclusions

18. The SAC will be broad-minded, acknowledging where conflicting views exist and considering whether alternative interpretations fit the same evidence.
19. Where both risks and benefits have been considered, the committee will address each with the same rigour, as far as possible; it will make clear the degree of rigour and uncertainty, and any important constraints, in reporting its conclusions.
20. SAC decisions will include an explanation of where differences of opinion have arisen during discussions, specifically where there are unresolved issues, and why conclusions have been reached. If it is not possible to reach a consensus, a minority report may be appended to the main report, setting out the differences in interpretation and conclusions, and the reasons for these, and the names of those supporting the minority report.
21. The SAC's interpretation of results, recommended actions or advice will be consistent with the quantitative and/or qualitative evidence and the degree of uncertainty associated with it.
22. SACs will make recommendations about general issues that may have relevance for other committees.

Communicating SACs' conclusions

23. Conclusions will be expressed by the SAC in clear, simple terms and use the minimum caveats consistent with accuracy.
24. It will be made clear by the SAC where assessments have been based on the work of other bodies and where the SAC has started afresh, and there will be a clear statement of how the current conclusions compare with previous assessments.
25. The conclusions will be supported by a statement about their robustness and the extent to which judgement has had to be used.
26. As standard practice, the SAC secretariat will publish a full set of references (including the data used as the basis for risk assessment and other SAC opinions) at as early a stage as possible to support openness and transparency of decision-making. Where this is not possible, reasons will be clearly set out, explained and a commitment made to future publication wherever possible.

27. The amount of material withheld by the SAC or FSA as being confidential will be kept to a minimum. Where it is not possible to release material, the reasons will be clearly set out, explained and a commitment made to future publication wherever possible.
28. Where proposals or papers being considered by the FSA Board rest on scientific evidence produced by a SAC, the Chair of the SAC (or a nominated expert member) will be invited to the table at the Open Board meetings at which the paper is discussed. To maintain appropriate separation of risk assessment and risk management processes, the role of the Chairs will be limited to providing an independent view and assurance on how their committee's advice has been reflected in the relevant policy proposals, and to answer Board Members' questions on the science. The Chairs may also, where appropriate, be invited to provide factual briefing to Board members about particular issues within their committees' remits, in advance of discussion at open Board meetings.
29. The SAC will seek (and FSA will provide) timely feedback on actions taken (or not taken) in response to the SAC's advice, and the rationale for these.

Universal Ethical Code for Scientists

The Universal Ethical Code for Scientists, developed by the Government Chief Scientific Adviser, is a public statement of the values and responsibilities of scientists. The term 'scientists' means anyone whose work uses scientific methods, including social, natural, medical and veterinary sciences, engineering and mathematics.

Rigour, respect and responsibility: A universal ethical code for scientists

Rigour, honesty and integrity

- Act with skill and care in all scientific work. Maintain up to date skills and assist their development in others.
- Take steps to prevent corrupt practices and professional misconduct. Declare conflicts of interest.
- Be alert to the ways in which research derives from and affects the work of other people, and respect the rights and reputations of others.

Respect for life, the law and the public good

- Ensure that your work is lawful and justified.
- Minimise and justify any adverse effect your work may have on people, animals and the natural environment.

Responsible communication: listening and informing

- Seek to discuss the issues that science raises for society. Listen to the aspirations and concerns of others.
- Do not knowingly mislead, or allow others to be misled, about scientific matters. Present and review scientific evidence, theory or interpretation honestly and accurately.

You can read the full version of the Code at:

<http://www.food.gov.uk/science/researchpolicy/commswork/ethcode>