

Protecting UK consumers: the experience of the Food Standards Agency

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La *Food Standards Agency* è il primo dipartimento governativo nel Regno Unito che si occupa di sicurezza e salute alimentare ed è stata istituita nel 2000 proprio per tutelare gli interessi del consumatore. È stata concepita come un dipartimento non ministeriale, governato da un Consiglio indipendente.

Gran parte dell'attività è finalizzata alla sicurezza alimentare, contrastando le tossinfezioni alimentari che portano a circa 500 decessi all'anno nel Regno Unito. Tuttavia, il più grande rischio per la salute pubblica è quello legato alla salubrità della dieta e al disequilibrio delle sostanze nutritive ingerite, problematiche che conducono all'obesità, alle malattie cardio-vascolari e a certi tipi di cancro.

È significativo notare come la FSA utilizzi con interesse le nuove tecnologie, come i *social media*, per favorire la comunicazione con il pubblico. Usa svariati metodi per stringere rapporti con un numero sempre più largo di persone, consapevole che non tutti possono essere raggiunti nello stesso modo: non tutti, infatti, hanno un accesso a Internet, sanno usare un telefono cellulare o parlano inglese come prima lingua.

La determinazione dell'Agenzia nel mettere al primo posto l'interesse del consumatore non significa comunque fare quello che i consumatori vogliono. La *Food Standards Agency*, come tutti gli organismi regolatori, deve trovare un delicato equilibrio tra la valutazione della conoscenza del consumatore e il fatto di basare le proprie decisioni sui consigli degli esperti e sulla voce della scienza.

Oltre a servirsi delle indicazioni fornite dai comitati scientifici, l'Agenzia investe più di 20 milioni di sterline all'anno per una serie di ricerche in diversi settori della politica alimentare.

Significativo è il livello di apertura della FSA: per l'Agenzia rendere disponibili le informazioni è la norma; consigli e informazioni sono resi largamente fruibili, inclusa la spiegazione di come le decisioni siano state prese. La manifestazione più visibile di questa politica di apertura riguarda le riunioni del Consiglio dell'Agenzia, organismo deputato a prendere decisioni. Il Consiglio si riunisce in pubblico e chiunque può assistere alla riunione o guardarla in diretta sul sito Internet.

Il fatto che il Consiglio si riunisca in sessione aperta assicura una trasparenza sulle modalità con cui l'Agenzia effettua la valutazione del rischio, soppesando le considerazioni, e come essa arrivi alla decisione sulla gestione di questo rischio.

Tutto questo ha luogo in sessione aperta. Molti *stakeholder* interessati partecipano agli incontri, altri li guardano in diretta sul web. In genere circa 50 persone prendono parte fisicamente alla riunione e più di 500 la seguono online. L'Agenzia è sicura che questo impegno per garantire la trasparenza sia la chiave per ottenere la fiducia dei consumatori. E questa fiducia è essenziale per una comunicazione efficace al consumatore stesso.

Un altro esempio di come l'Agenzia dimostri apertura nei confronti del pubblico è il *Chief Scientist Andrew Wadge's blog*. Il *blog* è percepito come un volto amico dell'Agenzia, che può incoraggiare le persone ad avvicinarsi a essa in modi diversi, ed è utile per stimare l'impatto del proprio lavoro sui consumatori.

Spesso il modo migliore per proteggere i consumatori è dare loro informazioni che li rendano sicuri nel momento in cui prendono decisioni in autonomia.

Per esempio, fra i progetti che al momento mirano a conferire potere ai consumatori attraverso l'informazione, vi è quello relativo alla valutazione dell'igiene dei cibi dei ristoranti e di altre imprese di ristorazione. Queste stime si esprimono con un punteggio dato a ciascuna impresa, che potrà essere esposto all'ingresso del locale. L'affissione è volontaria, ma questo porterà comunque i clienti perspicaci a porsi delle domande su quei locali che non la esporranno.

La migliore forma di regolazione non sta in ciò che l'Agenzia in quanto regolatore dice alla gente di fare, ma piuttosto in un sistema che dà alle persone informazioni sufficienti, appropriate e chiare, così che possano fare le proprie scelte in maniera efficace.

Dall'ultimo sondaggio sull'opinione delle persone nei confronti dell'agenzia emerge come il 60% del pubblico che conosce la FSA la consideri un'organizzazione di cui ci si può fidare.

Questa fiducia è guadagnata favorendo la partecipazione del pubblico. Ed è importante ricordare che i dati scientifici a supporto delle indicazioni e dei consigli alimentari forniti dall'Agenzia vengono accolti dai consumatori proprio in ragione della fiducia che essi ripongono nella FSA e nei suoi processi decisionali. Senza questa fiducia, che presuppone trasparenza e partecipazione, le comunicazioni della FSA, pur scientificamente fondate, non avrebbero seguito.

Introduction

The Food Standards Agency is the lead Government department in the United Kingdom on food safety and healthy eating. It was established in 2000 with the remit stated in the Food Standards Act 1999 «to protect the public health from risks... which may arise in connection with the consumption of food and otherwise to protect the interest of consumers in relation to food».

This article describes the work of the Food Standards Agency in protecting public health. It looks at the establishment of the Food Standards Agency and how it ensures that the interests of consumers are protected and the importance of building trust in the Agency. It looks at the Agency's key principles: putting the consumer first, being science and evidence based, and a clear commitment to openness and independence.

All of these have contributed to building the Agency's reputation and ensuring that it can work effectively with stakeholders - the food industry, consumer and health organisations, other government departments, local authorities and the science community - to deliver the Agency's goals. The article also looks at the challenges the Agency faces in providing information to consumers.

Establishing the FSA

The FSA was set up in the wake of the bovine spongiform encephalopathy (BSE) crisis of the 1980s and 1990s. The initial Government response to BSE suggested that there was no risk to public health. This was subsequently shown to be inaccurate as people became infected with new variant Creutzfeld-Jakob disease, believed to be transmitted from eating parts of infected cattle. This led to public confidence in the Government over food issues reaching an all-time low.

The establishment of the Food Standards Agency was intended to address this, a fresh start to protecting consumers. Previously, the responsibility for food safety rested with the Ministry of Agriculture, Fisheries and Food. This department was also responsible for promoting the interests of the food and farming industry. It was perceived that this had created a conflict of interest and meant that the interests of UK consumers were not being put first.

The Food Standards Agency was established specifically to put the interests of consumers first. It was set up as a non-ministerial department. Rather than the authority for the Agency resting with a minister, the Agency is led by an independent Board.

The role of the Food Standards Agency

The work of the Agency embraces a number of areas. It regulates food safety law in the UK. It reviews and considers research on issues relating to food safety and also undertakes its own research. Where appropriate, for example in cases where legislation is required, the Agency provides advice to Government ministers. In other areas it provides advice to the public on food and food safety.

Work on food safety plays an important role in tackling food-borne illness which leads to around 500 deaths a year in the UK. But arguably the greater public health risk in relation to food is due to dietary health, and the imbalance of nutrients which leads to obesity, cardio-vascular disease and certain cancers.

The Agency has increased its focus on improving dietary health through work on reducing intakes of salt and saturated fat, improving the energy balance in people's diets and providing better information for consumers.

Its effectiveness in this work depends on a number of factors. Key to these have been demonstrating to the public and to stakeholders a determination to put the consumer first. This has led to an active programme of consumer engagement so that in all areas of its policy work the Agency is listening carefully to the views of consumers.

Engaging with consumers

The democratic principles of social equality and respect for the individual are intrinsic to the three key reasons for engaging with consumers:

- develop effective policy and communication strategies. Good policy is based on a genuine understanding of consumers - their lives, desires and constraints;*
- increase trust and legitimacy by being open to public scrutiny and increasing public awareness of our work;*
- develop ongoing dialogue with consumers, and others, which enables the Agency to build alliances for positive change.*

Being accessible, transparent and having the public's trust is conducive to a fluid dialogue, and helps dialogue continue during difficult times.

The FSA is a thoughtful organisation, keen to use new technologies, such as social media and other methods, to facilitate public dialogue. It uses wide-ranging methods to engage with as many people as possible, because not everyone can be reached in the same way - not everyone has online access, is able to use a mobile phone or can speak English as a first language, for example.

Traditional forms of engagement such as public meetings, written consultations and focus groups are used. But the full spectrum of engagement meth-

ods ranges from quantitative research, which involves no deliberation (such as evidence reviews, opinion polls and surveys) and little direct dialogue with the public (this includes qualitative depth interviews, reconvened discussion groups, online consultations, online discussion forums), through to citizens' forums, deliberative polling, and citizens' summits, as well as consensus building workshops, which are almost entirely built on deliberation and interaction, and citizen juries, where deliberation dominates.

The web is used to engage by making the website accessible and usable. It is used to issue press releases and news stories, so the public, via the media or otherwise, are kept informed early on about policy decisions and new advice.

Across the UK, ten Citizens' Forums on Food each meet three times a year to develop a deeper, richer conversation with the public to understand some of the current concerns that consumers have about food issues, and to gain their input into the earliest stages of policy development.

The case study below on animal cloning illustrates the approach taken.

Case study: animal cloning and implications for the food chain

Issue

Animal cloning is an emerging technology in the European Union and is more developed in the US. If its use becomes economically possible, there is the potential for food produced from cloned animals to come on the market. The current regulatory position is that no cloned animals, their offspring or their products can enter the food chain.

The FSA researched the UK public's views about cloning animals, and cloned animals, their offspring and their products (such as milk and meat) entering the food chain.

The research was just one part of the engagement process. It not only informed the FSA policy position in this area but also informed the communications strategy, another key part of public engagement.

Research method and challenges

To overcome the challenge of how to ask people about a complex subject they would have little knowledge about, a deliberative approach was adopted, based on reconvened workshops. Participants took part in two three-hour sessions, as well as carrying out their own background reading and research. The FSA provided reading material, as well as links to other sources of information, that needed to give sufficient depth but also be understandable to people from a wide range of socio-demographic backgrounds.

First workshop focused on current livestock breeding methods, an explanation of how clones are produced, how this technique can be applied to animal livestock breeding and the implications of this for the food chain.

Interim period of one week to allow participants to reflect on the information they had received and to do their own research.

Second workshop focused on participants' views on buying and eating food derived from clones and their offspring, as well as the steps they thought should be taken if such food went on sale in the UK.

FSA scientists were present to answer questions and engage in dialogue directly.

To allow a wide range of views to be expressed, everyone was given the space to express their views at breakout groups and during a mixture of exercises.

Some participants were sceptical about the purpose of the research, holding the view that perhaps the FSA had a hidden agenda to persuade them of the benefits of cloning.

Outcomes

Participants' key areas of concern were whether food derived from clones would be safe to eat, standards of animal welfare, the lack of tangible consumer benefits, and a mistrust in the motives of the main players involved.

The use of science

The Agency's determination to put consumers first does not mean simply doing what consumers want. The Food Standards Agency, like all regulatory bodies, has to strike a delicate balance between considering consumer knowledge, values and attitudes and basing its decisions on expert advice and sound science.

The Agency has a strong science base, both in its staff and in the external advice received. Almost half of the agency's staff have a science background with the majority of those having postgraduate research experience. In addition there is expertise and challenge from about 150 eminent scientists who sit on the 10 independent scientific committees which advise the Agency. For example these include the committees on carcinogenicity, on novel foods and on nutrition.

The two most recent additions to the committee structure are a General Advisory Committee on Science and a Social Science Committee.

The General Advisory Committee provides an additional check that science governance structures remain robust. It also co-ordinates the horizon scanning work undertaken by all of the scientific advisory committees. This is providing valuable intelligence on emerging risks and challenges.

The Social Science Committee reflects the growing importance of this branch of science. Social science has particularly grown in importance as the Agency has developed policies on dietary health where there is a strong need to under-

stand better the behaviour of consumers in order to reach better policy decisions. The social science committee is helping the Agency do this.

As well as the advice from scientific committees, the Agency commissions over £20m of research each year across a range of food policy areas.

Here are three examples of current projects to demonstrate the range which the research programme covers.

- A study of causes of infectious intestinal disease to understand the extent to which foodborne illness is a cause of the disease. This will improve forecasting of the levels of foodborne illness.*
- An American study to understand the triggers of peanut intolerance in children. This will help test the theory that high levels of exposure to allergens at a young age may prevent the development of food allergy.*
- An analytical method to help detect mechanically recovered meat. This is helping protect consumers by ensuring that the hygiene rules around the use of mechanically recovered meat are enforced.*

Openness and transparency

There is a third element to how the Agency operates which has been key to ensuring public confidence - an unshakeable commitment to openness and transparency.

For the Agency disclosure of information is the norm. Advice and information is made widely available, including explaining how decisions are reached. The most visible manifestation of the policy of openness concerns the Agency's Board meetings. It is at the Board that policy decisions are taken. The Board meets in public; anyone can attend the meeting or watch them live on the website.

The fact that the Board meets in open session ensures that it is clear how we are weighing the risk assessment evidence against other considerations and how we come to our risk management decisions.

Let me give an example of how this works in practice.

The Board was recently asked to consider a change to the rules allowing over-thirty-month cattle into the food chain. Under the new European rules, certain countries with robust monitoring systems could amend the regulations to allow cattle over forty-eight months to enter the food chain. For the obvious reason of our history, this is a particularly sensitive subject in the UK.

The Board considered the advice of SEAC, the relevant advisory committee. Its advice highlighted that the risks were very small. But in discussion it became clear that alongside any change it would be sensible to maintain the current level of monitoring of BSE levels in cattle so that we remained vigilant to changes in the risk profile.

The Board considered that the case for a change had effectively been made. But that it would be prudent to seek reassurances on the future monitoring regime, which is the responsibility of the Environment and Rural Affairs department.

We therefore deferred a final decision until those reassurances had been received. Once those were given at our next meeting we agreed our recommendation to ministers that the over forty-eight month change be implemented.

All of this took place in our open session. Many interested stakeholders attended the meetings. Others watched live on the web. Typically we will have 50 people attending a Board meeting in person, and up to 500 watching it on the web. We are certain that this commitment to openness is key to winning the trust of consumers. And that trust is essential to our effective communication to consumers.

Another example of how the Agency demonstrates openness has been our Chief Scientist Andrew Wadge's blog. This has been running for two years, and initially formed part of the Hansard Society's Digital Dialogues project. Andrew is trying to reach out to people who are interested in the science behind the story and encourages them to access the depth of evidence and analysis that drive the Board's public discussions of policy. This has triggered useful debates around science and food safety, such as raw milk. The blog is seen as a friendly face of the Agency, which may also encourage people into engaging with us in other ways, and is useful for gauging the impact of our work.

An illustration of how science and consumer communications meet is the study which we undertook on artificial food colours in 2007.

The advice from our Scientific Committee on Toxicity was that the study showed a clear but modest association - not cause and effect - between two mixtures of a specific set of additives and an increase in hyperactive behaviour in some, but not all, children.

Our initial risk management response was therefore to target advice at parents of children showing signs of hyperactivity as they would see the most benefit from cutting out foods containing these colours.

However it swiftly became clear that this advice raised questions for many other parents too. There was a strong sense that if these colours were only being added to food for presentational reasons then more strenuous efforts should be taken to stop their use.

With this feedback we supplemented our advice with further information for consumers. We emphasised the point that there was no immediate food safety risk, hence no case for an immediate ban. But we also called on the food industry to take voluntary action to withdraw these colours from use by the end of 2009.

It was a strong reminder for us that we need to be close to consumers, and maintain a thorough understanding of their concerns. Only then can we ensure that our risk management decisions and our risk communication will find a receptive audience.

In many areas the Agency believes that the best way to protect consumers is to give them information so that they are confident in making their own de-

cisions. There are two schemes at present which seek to empower consumers through information.

The first of these relates to food hygiene assessments for restaurants and other catering establishments. These assessments lead to a score for each outlet. We are now developing a Scores on the Doors scheme which will allow the score to be displayed at the venue. The score will probably be translated into a rating system, something like a star rating system.

Our experience of where we have piloted the scheme in the UK, and also the evidence from schemes elsewhere in the world, is that consumers find this information interesting and useful. Displaying the score will be voluntary, but we hope that discerning customers will soon start to ask questions about places not displaying the score. In turn we would expect this to drive up food hygiene standards.

Similarly we are exploring this approach in the use of calorie information on restaurant menus. We are working with a number of restaurant chains to begin using this information and so understand the challenges in providing this information and how different ways of displaying it will inform consumers.

But the outcome we believe will be a new and effective way of communicating risk information to consumers. Working with the grain of the market, rather than using the force of regulatory powers.

I have always believed that the best form of regulation is not one where we as a regulator tell people what to do. But rather a system that gives people sufficient, appropriate and clear information so that they can make their own choices in an effective way.

Conclusion

I am convinced that it is our structure and our culture which are key to assessing and managing food safety risk.

The scientific rigour is the base on which our decisions are made. Our independence and transparency provides reassurance to consumers. The trust which consumers place in our decisions also provides market stability for industry - very important and a significant change from the 1990's.

The future

People are complicated. What matters to an individual might be different to what matters to the wider world, and the difficulty in differentiating between the two will continue to be a challenge which we must bear in mind.

Clearly the challenges of food policy and technology are here to stay. The World Bank estimates that the global demand for food will rise by 50% by 2030. Such a

threat to food security may well impact on the public's attitude to emerging areas of food science and technologies that might improve the efficiency of food production - such as GM, cloned animals and nanotechnology - if these methods are perceived or proven to be a sustainable solution for future generations.

But technological advances in communication can help us with this engagement as well as presenting us with issues that we need to tackle. So we will continue to experiment with developments in online and digital technology, to help us increase the range of people with whom we engage. And at the same time we will continue to work with our staff, our committees and our stakeholders to enmesh our public engagement in our policy making process - to knit together old methods with new technologies to achieve the FSA vision of safe food and healthy eating for all.

In the latest survey of people's attitudes to the Agency, 60% of the public who had heard of the Agency rate the FSA as an organisation they can trust.

But that trust is earned, and public engagement is vital in helping us earn it. We have always been clear that our policies are informed by the best science. But without earning that trust, the public will not accept the science that supports our advice on food.