ACM/911

ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD

GOOD PRACTICE GUIDELINES FOR THE INDEPENDENT SCIENTIFIC ADVISORY COMMITTEES

Issue

1. ACMSF is required to review its compliance with the Food Standards Agency's Good Practice Guidelines for Scientific Advisory Committees (SAC) as part of the Agency's science governance procedures and publish the outcome in its annual Report.

Background

2. In 2005 an independent review of the Food Standards Agency recommended that the Agency's policy of basing decisions on scientific evidence should be maintained and developed further [1]. In response to this in 2006 the FSA Board supported a proposal from the SAC Chairs to strengthen scientific governance through development of Good Practice Guidelines based on the FSA Science Checklist. These draft guidelines were reviewed by ACMSF in September 2006 (paper ACM/801) and were adopted by the Board in May 2007 (FSA 07/05/05).

3. The guidelines set out the risk assessment process SACs should take into account when drawing up their advice. Twenty seven principles of good practice have been developed. As the different committees have different duties and discharge those duties in different ways, not all of the principles are applicable to all of the SACs, all of the time. Some of the key areas that the principles cover include:

- The Agency ensuring that the issue to be addressed is clearly defined and takes account of stakeholder expectations;
- Taking steps 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considered by the committee, including consulting external/additional scientific experts who may know of relevant unpublished or pre-publication data;
- Consulting stakeholders during the committee's considerations, holding SAC discussions in public;
- Weighting data according to quality;

[1] 2005 Review of the Food Standards Agency. An independent review conducted by the Rt Hon Baroness Dean of Thornton-le-Fylde. March 2005

- Assessment of study design, methodology, data measurement and analysis;

- Qualitative data assessment in accordance with good practice guidance set out by the Government's Chief Social Researcher [2];

- Consideration of provision of unpublished stakeholder and different country-wide data to support evidence assessment;

- Formal statistical analyses to be included wherever possible. To support this, each committee will have access to advice on quantitative analysis and modelling as needed;

- When reporting outcomes, committees 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.

- Data gaps will be identified and their impact on uncertainty assessed by the committee. Assumptions will be identified and challenged;

- Where both risks and benefits have been considered, the committee will address each with the same rigour. Decisions will include explanations of differences of opinion, unresolved issues and why conclusions have been reached;

- The committee'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.

- Conclusions will be expressed by the committee in clear, simple terms and use the minimum caveats consistent with accuracy. Conclusions will be supported by a statement about their robustness and the extent to which judgement has had to be used;

- Committees will make recommendations about issues of relevance for other committees;

- Publication of references to support openness and transparency of decision making; Where it is not possible to publish material, the reasons will be set out with a commitment to future publication;

- SAC Chairs may be invited to brief Board Members about issues within their Committees' remits.

4. During the course of its work to develop advice, the Secretariat, ACMSF and its *ad hoc* and working groups ensure that appropriate

[2] A Framework for assessing research evidence, August 2003;
www.strategy.gov.uk/downloads/su/qual/downloads/qqe-rep.pdf
www.gsr.gov.uk/professional_guidance/magenta_book/guidance.asp (The Magenta Book)

scrutiny has been employed in accordance with these Guidelines before reports are presented to ACMSF for public consideration. In 2007 this practice was applied throughout the development of reports providing advice on safe cooking of burgers, botulism in sheep and goats, ESBLs in the food chain and listeria in the over 60's. The Committee also used these guiding principles to formulate *ad hoc* advice on a range of microbiological issues including avian influenza, egg and poultry surveillance and food safety advice on flooding.

5. ACMSF was also briefed on probabilistic modelling to support the guidance recommendation on issues relating to committees having access to advice on quantitative analysis and modelling.

ACMSF assessment

6. In the 2007 annual SAC review and member self assessment, ACMSF Members were asked to review their performance against the key principles set out in the guidelines.

7. ACMSF agreed that the work of the Committee conforms closely to the requirements of the good practice guidelines. Members also commented that:

- Undertaking a more robust and transparent assessment of the studies and addressing quality of data issues were difficult areas of improvement;
- There was a need to improve public accessibility to work of the committee;
- ACMSF should consider shortening the time it takes to produce working group reports, without compromising the quality of advice;
- Important messages were at times buried in detailed discussions;

Detailed comments made by Members on ACMSF's work to support the guidance are summarised in the attached Annex.

Action required

8. Members are asked to:

comment on the issues raised in the paper and to agree that the Committee's views may be published in the ACMSF annual report 2007.

Secretariat
April 2008

Annex 1

Assessment of Committee's work against Good Practice Guidelines

Comments made by Members for 2007

Specific Comments

The ACMSF work is consistent with the good practice guide and indeed goes beyond it by holding all of its main committee meetings in public. The committee is open, seeks views of relevant stakeholders in the development of its advice and adopts a risk based approach to its work.
The committee has a wide range of independent experts and the work of the committee and the sub-groups is operated in an open and transparent way. The ACMSF meetings are also held in public so it gives the general public and representatives of various groups and organisations an opportunity to listen to our discussions and make comments or ask questions themselves. It is also very clear that the committee is focusing on risk assessment. I have studied the 27 principles of good practice guidelines of the Code of Practice for the Independent Scientific Advisory Committees and I cannot see any principles that our committee is not adhering to.
In general the committee's work falls within the standard outlined in the Guidelines. A difficult area of improvement is to undertake a more robust and transparent assessment of the studies and data quality used in any analysis. Also as much as possible of the process and work of the committee should be made public.
Defining the issue: I think that the issues we have looked at have been clearly defined.
Seeking input: the Committee seeks input from external experts when appropriate – in the plenary meetings as well as on the working groups. The scope of literature searches always seems to be clear. The Committee also generally consults on draft reports to get wider input and always holds its main meetings in public.
Validation: The quality of data is carefully considered, qualitative as well as quantitative data is considered and formal statistical analyses are incorporated when possible.
Uncertainty: I think that any uncertainties or assumptions are made clear.
Drawing conclusions: Risks and benefits are taken into account and decisions made it clear where there are different views.

Communicating committees' conclusions: I think that the Committee's conclusions are clear and it is made clear what they are based on. I don't think that there is usually an explicit statement 'about the robustness and the extent to which judgement has had to be used' but this is usually included.
The only additional comment I would make is that, as with all of the scientific committees, it can take a very long time to produce a working group report. It would be worth looking at whether it is possible to address this without compromising the quality of the input and the assessment.
I think we try very hard to work to the good practice guidelines. Sometimes I think we try a little too hard when documents include so much discussion of all sides of the argument that the important messages are buried.

General Comments

The committee generally follows good practice. Certainly the secretariat strive to ensure that we do at all times.
The committee conforms closely to the good practice guidelines.
To the best of my knowledge, the work of the Committee is compliant with the stated guidelines.
Excellent match to the guidelines.