

# ACAF Annual Report 2023/24 - Appendix II Self-assessment against the Good Practice Guidelines

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### Appendix II Self-assessment against the Good Practice Guidelines

In line with the [Good Practice Guidelines for Scientific Advisory Committees](#), the Committee have reviewed their application of the principles of the Guidelines:

Defining the problem and the approach

**Principle**

**Compliance**

**Evidence/  
additional  
information**

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.

The role of the Committee is clearly defined. The Chair will refer back to the Secretariat if further clarification is needed.

Seeking input

| Principle  | Compliance | Evidence/ additional information  |
|--|------------|---|
| 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. | Yes        | The outputs of the Committee are shared with the relevant stakeholders for comment and checking the presence of confidential information.   |
| 3. Wherever possible, SAC discussions should be held in public.  | Yes        | Due to commercial sensitivities and the nature of ACAF's work, the majority of discussions cannot be held in public. However, the minutes (excluding any commercially sensitive information) are published in the ACAF website. |
| 4. The scope of literature searches made on behalf of the SAC will be clearly set out.   | N/A        | There were no literature searches made on behalf of the Committee in 2023/24.   |

| Principle   | Compliance | Evidence/ additional information   |
|---|------------|--|
| 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. | Yes        | The Committee is comprised of a diverse panel of experts who critically assess all scientific evidence. If needed, the Committee, with the assistance of the Secretariat, seeks further information from other Committees or individual experts. |
| 6. Data from stakeholders will be considered and weighted according to quality by the SAC.  | Yes        | The SAC critically assess all scientific evidence provided by applicants; better quality data is given more weighting.   |
| 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.   | Yes        | The Chair and the Secretariat often discuss the gaps in expertise of the Committee, to inform the yearly recruitment campaigns and any future work needs.  |
| 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.   | Yes        | When applicable, input is requested from other SACs (for example the Committee on Toxicity) if additional expertise is needed.   |
|   |            | This was not necessary in the period of this report.   |

#### Validation

| Principle | Compliance | Evidence/ additional information |
|-----------|------------|----------------------------------|
|-----------|------------|----------------------------------|

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|---|------------|---|
| <p>9. Study design, methods of measurement and the way that analysis of data has been carried out will be assessed by the SAC.</p>  | <p>Yes</p> | <p>The Committee critically assess the experimental design and data analysis of all dossiers.</p>   |
| <p>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.</p>  | <p>Yes</p> | <p>All data is assessed against the legislation and any published guidance documents.</p> <p>The Committee also evaluate the methods used to generate the data and ensure that they are in agreement with recognised standards/ quality assurance schemes (for example, Good Laboratory Practice (GLP), International Organization for Standardization (ISO), etc.)</p> |
| <p>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.</p>  | <p>Yes</p> | <p>The Committee's expertise allows for evaluation of statistical analyses. Further support is available, when required, through other Committees and external experts.</p>   |
| <p>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.</p> | <p>Yes</p> | <p>The Committee consider the relevance of any data submitted to the UK feed/farming market, particularly when originating from outside the UK.</p> <p>The Committee often consider unpublished data from applicants and request additional information if required.</p>  |

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.

Yes

Application dossiers include a list of references which make it clear whether they have been peer reviewed.

Uncertainty

| Principle  | Compliance | Evidence/ additional information  |
|--|------------|---|
| <b>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.</b>        | <b>Yes</b> | <b>The ACAF clearly outline their conclusions and uncertainties are identified.</b>   |
| <b>15. Any assumptions made by the SAC will be clearly spelled out, and, in reviews, previous assumptions will be challenged.</b>  | <b>Yes</b> | <b>Any assumptions are clearly labelled as such in the Committee's Advice document.</b>   |
| <b>16. Data gaps will be identified and their impact on uncertainty assessed by the SAC.</b>   | <b>Yes</b> | <b>Data gaps and their impact on uncertainty are recorded in the Committee's Advice document.</b>   |
| <b>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.</b> | <b>Yes</b> | <b>The Committee considers the latest scientific developments when carrying out their evaluations. This is taken into consideration within the regulatory framework of the ACAF's work.</b> |

Drawing conclusions

| Principle | Compliance | Evidence/ additional information |
|-----------|------------|----------------------------------|
|-----------|------------|----------------------------------|

18. The SAC will be broad-minded, acknowledging where conflicting views exist and considering whether alternative interpretations fit the same evidence. Yes

Members critically evaluate any conclusions made by applicants and consider alternative explanations.

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. N/A

The nature of the ACAF's work in the past year did not require the need to consider risks and benefits.

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. Yes

The final opinions are adopted by consensus, identifying the key issues and generally explaining the reasoning behind the Committee's conclusions.

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. Yes

The Committee base their conclusions and advice on the evidence, taking uncertainty into account.

22. SACs will make recommendations about general issues that may have relevance for other committees. Yes

Application dossiers include a list of references which make it clear whether they have been peer reviewed.

## Communicating SACs conclusions

| Principle  | Compliance | Evidence/ additional information  |
|--|------------|---|
| 23. Conclusions will be expressed by the SAC in clear, simple terms and use the minimum caveats consistent with accuracy.  | Yes        | Conclusions in the Committee's Advice Documents are aimed to be drafted in a clear and concise way.   |
| 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.   | Yes        | The Committee's Advice Documents clearly outline where assessments are based on the work of other bodies, such as the AFFAJEG. The work and conclusions of each body are well explained.<br><br>The ACAF conclusions specify the regulatory framework under which they were undertaken. Any science-based judgement used is described within the conclusions. |
| 25. The conclusions will be supported by a statement about their robustness and the extent to which judgement has had to be used.  | Yes        |   |
| 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. | Yes        | The regulatory and guidance framework are published in the main FSA website. The specific data from dossiers on which the risk assessment may take place cannot be made public.   |

| Principle  | Compliance | Evidence/ additional information  |
|--|------------|---|
| 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.   | Yes        | Commercially sensitive information is kept confidential, but the Committee and the FSA require the applicant to justify why such information should be confidential. The FSA can refuse a request if they deem it unacceptable. |
| 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. | N/A        | No proposals or papers were taken to the FSA board in 2023/2024.  |



| Principle  | Compliance | Evidence/ additional information  |
|--|------------|---|
| 29. The SAC will seek (and FSA will provide) timely feedback on actions taken (or not taken) in response to the Yes SAC's advice, and the rationale for these. |            | Following preparation of the Committee's Advice document, the FSA publish a Safety Assessment based on the Committee's recommendations. All decisions made by the FSA following the Committee's recommendations (including the outcome of the risk management step) are given as updates in meetings. |

In addition to reviewing their application of the principles of the Good Practice Guidelines, the Committee also self-assess the degree to which they feel they have worked effectively to the Guidelines in an annual appraisal process. In the 2023/24 annual appraisal, Members were asked how much they agreed with the following statement: "The SAC has been effective when working against Good Practice Guidelines".

67% of Members strongly agreed, 17% agreed and 17% neither agreed nor disagreed with the statement. No Members disagreed with the statement.

The Chair was asked the same question. The Chair agreed with the statement.