

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

78th Meeting of ACAF on 27 February 2019

Discussion paper

**UPDATE ON THE FSA's PLANS FOR ITS SCIENTIFIC ADVISORY
COMMITTEES (SACs)**

ACAF Secretariat/ FSA CSA Team

February 2019

ACAF PAPER ON AN UPDATE ON THE FSA'S PLANS FOR ITS SCIENTIFIC ADVISORY COMMITTEES (SACs)

Issue

1. To update the Committee on the work the Food Standards Agency (FSA) has been undertaking to develop its scientific capability, in light of the changing demands on risk assessment brought by the UK's exit from the EU. The paper outlines the conclusions reached and the impacts this has on the work of the Advisory Committee on Animals Feedingstuffs (ACAF) and the FSA's other Scientific Advisory Committees (SACs);
2. To seek Committee Members' views and comments on the plans; and
3. To confirm Committee Members' willingness to participate in the new Joint Expert Groups (including the joint COT/ACMSF/ACAF group covering feed and feed additives), to work as co-opted members with other FSA SACs, and/or to be part of the planned new structures to separately provide risk management or technical advice.

Background

4. The triennial review of SACs for which the FSA is lead sponsor (carried out between September and November 2015) concluded that the functions of Advisory Committee on Novel Food and Processes (ACNFP) and ACAF should merge after a consultative process that should be completed by December 2017. However, following the UK's decision to leave the EU, the FSA has been reviewing the structure of its SACs to ensure that the FSA will be able to access the independent expert advice to meet its needs after the UK leaves the EU. This includes advice to inform national assessment for approval of products that require authorisation (regulated products), since these products may need to be assessed and authorised at UK level.
5. The FSA needs to ensure that it can respond effectively to a potentially significant increase in the need for advice on risk assessment and related issues at national level. This includes:
 - more demand for advice on risk-based standards and controls, which comprises the bulk of the SACs' current work for FSA
 - new demands for advice to inform assessment of products that require authorisation (regulated products), which may need to be assessed and authorised at UK level.

6. Additionally, we will also need to ensure that our approach is clear in meeting established good practice for risk analysis, including the functional separation of risk assessment and risk management.
7. This work is part of a wider project to develop FSA's approach to risk analysis in preparation for the UK's exit from the EU. The plans for risk analysis are set out in detail in a paper discussed by the FSA Board in December 2018.¹

Current Structure of FSA's SACs

8. The FSA has four Scientific Advisory Committees (SACs) which provide independent expert advice on risk assessment²³:
 - Advisory Committee on the Microbiological Safety of Food (ACMSF)
 - Committee on Toxicity (COT)
 - Advisory Committee on Novel Foods and Processes (ACNFP)
 - Advisory Committee on Animal Feedingstuffs (ACAF)
9. Their current work focuses mainly on risk assessment to inform risk-based standards and controls. ACAF's work extends to other areas including advice more related to risk management, which makes up a significant proportion of its current work. Risk assessment for approval and review of regulated products is undertaken at EU level by EFSA (except for a small number of national assessments in limited areas carried out by ACNFP).
10. To meet the demands outlined in paragraph 2, the FSA will strengthen the structure and capability of the SACs as follows:
 - Advice on risk assessment, and technical advice directly relevant to risk assessment (such as migration of a chemical into food) will be delivered via the SAC model. Other advice informing risk management (such as whether an additive is effective and is needed) will be provided via other routes such as internal expertise or commissioned external advice or research.
 - For **risk-based standards and controls**, the existing SACs will continue to provide risk assessment advice (and if relevant risk assessment advice to inform discussions on trade agreements). This will be the main work of COT and ACMSF, with ACNFP and ACAF providing advice as needed.

¹ Paper FSA 18/12/11 and Annex, available at: <https://www.food.gov.uk/about-us/fsa-board-meeting-december-2018>

² The FSA Science Council and Advisory Committee for Social Science provide advice on strategic science issues and FSA's use of science. These areas are not affected directly by EU Exit and they are not discussed further here.

³ The FSA also receives advice by SACs for which other Departments lead, including the Committee on Carcinogenicity (COC), Committee on Mutagenicity (COM), Scientific Advisory Committee on Nutrition (SACN) and Advisory Committee on Dangerous Pathogens (ACDP). These arrangements will continue after EU Exit.

- For **regulated products**, three new Joint Expert Groups will be established to take on the bulk of this work:
 - 1. Food contact materials;
 - 2. Additives, flavourings, enzymes and other regulated products;
 - 3. Animal feed and feed additives.
- The first two will be Joint Expert Groups of COT and ACMSF, and the third will also be joint with ACAF, consistent with the existing remits of those three parent committees. ACNFP will provide advice on approvals of novel foods and GM (food and feed).

Future of ACAF

11. We have reviewed the recommendations of the Triennial Review of the FSA SACs which have been taken into account in developing the model. Given the new demands for national risk assessment, we do not intend to combine the work of the ACNFP and the ACAF, as originally recommended in the review. This reflects the need for a more holistic consideration of the FSA's risk assessment needs.
12. ACAF will continue as a key component of the FSA capability for 'Day 1' of EU Exit. As the Committee's current work is a mix of risk assessment and risk management, the FSA will work with the Committee to ensure a clearer separation between advice on risk assessment and other advice informing risk management.
13. For risk assessment, the FSA have invited ACAF Members with relevant expertise to join the new Joint Expert Group on feed. We will work with ACAF so that its work as a plenary Committee focuses on risk assessment.
14. The FSA will change the way we utilise ACAF Members' valuable expertise and advice in other areas informing risk management to clearly separate this from advice on risk assessment. We plan to do this by asking ACAF Members to feed into new structures for this other advice, which we are developing.
15. The ACAF Secretariat and the FSA Chief Scientific Adviser's Team would like to work with the Chair of ACAF and Members as we develop and test these new structures and to ensure a smooth transition and that the best use is made of the skills and expertise of ACAF Members. As a first step we have asked ACAF Members whether they would be willing, in principle, to serve on the Joint Expert Groups (including the joint COT/ACMSF/ACAF group covering feed and feed additives), to work as co-opted members with other FSA SACs, and/or to be part of the planned new structures to provide risk management or technical advice.

16. ACAF Members who are willing to serve in these capacities would not need to be interviewed for the new roles as they would be serving as ACAF Members, although additional details of their expertise might be needed to ensure that they join the appropriate structure. It is envisaged that the time commitment for the Joint Expert Groups could be approximately 6 meetings/year with additional time (around a half day/meeting) needed to review committee papers.
17. In the short/medium term, members who agree to serve in these new advisory structures would remain as ACAF Members. The FSA will review the arrangements for the SACs in the second half of 2019 in light of the demands being made on the risk assessment capability of the FSA and the experience of how the arrangements are working in practice, when the future structures of the SACs including ACAF will be determined.
18. A number of Members have indicated their willingness and we will be taking this forward in due course.

Action by Committee

19. The Committee is invited to:

- Note the work the FSA has carried out to develop its scientific capability in the light of the UK's decision to leave the EU;
- provide views and comments on the plans; and
- confirm their willingness to participate in the Joint Expert Groups (including the joint COT/ACMSF/ACAF group covering feed and feed additives), to work as co-opted members with other FSA SACs, and/or to be part of the planned new structures to provide risk management or technical advice.

ACAF Secretariat/ FSA CSA Team

February 2019