

CSA Response to the Science Council report on ‘Wider Impacts Beyond Food Safety Risk Assessment’.

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FINAL (15.10.24)

“I am hugely grateful for the work that the Science Council has undertaken on this challenging topic. Their report provides a comprehensive and thoughtful insight into the opportunities and challenges that exist in considering wider impacts within risk analysis.

The report makes clear that current risk analysis approaches provide little scope to achieve a more holistic assessment of societal risk/benefit. This creates the potential for counterproductive regulatory decisions – for instance, a product with major health gains might fail authorisation due to a minor, but non-zero, safety concern, or a product with significant environmental costs might enter the market because it does not present a risk to human health. The FSA very much recognises the potential benefit to consumers of integrating a more balanced consideration of risks and benefits into the authorisation of new products, although we also recognise that this is a complex area and highly dependent on the quality of the data that might underpin such a decision, e.g. sustainability metrics, health impacts and so forth.

We also note that there are additional ‘levers’ that might be applied in order to incorporate wider impacts into our regulatory role, beyond simply integrating them into risk assessment. For instance, products could be prioritised for regulatory consideration based on potential societal impact, rather than on a ‘first come, first served’ basis.

As the report makes clear, however, we operate within a global food system and consequently any significant change in FSA’s regulatory approach would require

careful coordination with other government departments, global trading partners and international organisations such as Codex Alimentarius and the World Trade Organisation. Many of the changes required are beyond the current remit of the FSA and therefore not within our gift to enact. Many of them would also require very substantial investments over multiple years in order to generate the underpinning data infrastructure that is required to accurately assess wider impacts. Nonetheless, the Science Council report represents an invaluable statement of ambition that will help accelerate global collaboration on 'wider impact' assessment.

Several of the most pressing societal problems around the world are intrinsically linked to food. Both public health problems, such as obesity and diabetes, and environmental problems, such as greenhouse gas emissions and water pollution, can only be solved with a radical rethink of our food system. Regulation in general, and risk assessment in particular, offers a powerful 'lever' to help achieve the reforms that will be essential in order to create a healthier, more sustainable food industry. This report highlights a number of ways in which governments, regulators and industry can work together to start to achieve those goals and I very much hope that it will help galvanise collaboration to achieve the change that is so urgently needed."

Professor Robin May, FSA Chief Scientific Adviser