

**FSA Science Council Working Group on Risk and Uncertainty (Working Group 2)**  
**Monday 5 February 2018**  
**Rooms 605 & 606, 6th floor, Clive House, London**

**Attendees**

<b>Working Group</b>	<b>Secretariat</b>	<b>FSA</b>
Mark Woolhouse (Chair)	Patrick Miller	Guy Poppy, Chief Scientific Adviser
Sandy Thomas	Gwen Aherne	Michelle Patel, Head of Social Science Transformation
Sarah O'Brien	Jane Ince	Justin Everard, Head of External Communications
John O'Brien		Manisha Upadhyay, Microbiological Risk Assessment Unit
Mark Rolfe		Barry Maycock, Chemical Risk Assessment Unit
Paul Turner		Stuart Armstrong, Head of Chemical Safety Policy Unit
		Milen Georgiev, Team Leader Meat Hygiene Policy
		Carles Orri, EU Exit Risk Assessment Workstream Lead

**Agenda item 1 - Welcome and introductions**

1. The Working Group (WG) Chair Mark Woolhouse welcomed attendees. He invited round table introductions as there were a number of FSA people attending for the first time.
2. The Chair noted that the aim of the meeting was to progress into Phase 2 of the Working Group's work. In Phase 2 the Working Group would:
  - a. Work with the FSA to develop and articulate the FSA's approach to identifying, describing and dealing with uncertainty in food safety risk analysis.
  - b. Advise on what is best practice on communicating risk and uncertainty.
  - c. Recommend how FSA can strengthen its approach to communicating risk and uncertainty.
3. The timetable is for the Working Group to develop its final recommendations and advice covering both phases to report to the Council's next open meeting scheduled for 27 June 2018.
4. The Chair discussed the potential outputs from Phase 2. He noted that the WG product could be in a similar form to phase 1 – that is, principles/best practice guidance (and associated recommendations) on communicating risk and uncertainty. The FSA would own the principles and the Working Group would help the FSA to develop them. The Chair invited comments on the proposed product. Guy Poppy noted that there was no preferred FSA model for the Council's advice and that principles provided a good structure with adequate flexibility; Justin Everard noted that principles would be useful for the FSA Communications team.

5. The Chair noted that the Group would like to stay alert to opportunities for additional outputs. Michelle Patel reported that the FSA was establishing a related project on risk communication and that it will be important that these workstreams inform each other.

**ACTION 1 – Secretariat to work with Michelle Patel to develop a process for ensuring alignment of the FSA and Working Group workstreams on risk communication**

6. The Chair raised the issue of joint working with Working Group 1 given there was overlap in remit in some areas (as described in the Working Group 2 Terms of Reference). There is cross-Working Group membership that could facilitate aligning the workstreams; Paul Turner agreed to take a lead in linking the two Groups. The Working Group Chairs could also discuss synergies and share emerging outputs. The Chair advised a mid-term review by telephone could be helpful. This would also be discussed with Laura Green, Chair of Working Group 1 at that Working Group's next meeting on 19 February.

**Agenda item 2 - Draft uncertainty principles SC WG2 paper 2-2**

**Update on phase 1 draft principles**

7. The Chair had discussed hand-over and ownership of the best practice principles on establishing risk and uncertainty - which the Working Group had helped the FSA to develop in phase 1 - with Guy and Sandy on 17 January. It was agreed that the next step would be for the Secretariat to finalise the document to prepare it for handover from the Working Group to the FSA. The Secretariat would circulate a final draft for Working Group comments. Further consideration was needed to clarify the Secretariat and Executive roles, and on how/when to invite wider views on the principles and/or wider package of advice from the Working Group (i.e. whether this would be done before or after formal handover of the principles/advice to the FSA).
8. The Working Group asked if there was alignment across government to ensure the language is consistent. Guy could share outputs with the network of Government Chief Scientific Adviser's for comments; however he noted that the FSA needed something more specific than what was available. Michelle Patel noted there is a Government Communication Service note on consistency which could be useful to check against; the FSA has some work starting on 'trust the messenger' which is relevant.

**ACTION 2 – Secretariat to prepare and circulate a final draft of the principles on establishing risk and uncertainty for Working Group comments in preparation for formal handover to FSA**

9. The Chair wished to record the Working Group's thanks to Steve Wearne, FSA Director of Policy, for producing draft principles on uncertainty for the Working Group's

consideration. These would help the Working Group to advise the FSA on developing and articulating the FSA's approach to identifying, describing and dealing with uncertainty in food safety risk analysis. The Secretariat noted that the principles had been produced by Steve as a starter for discussion; they were intended to cover the whole risk analysis process and were separated into the three elements of Risk Assessment (RA), Risk Management (RM) and Risk Communication (RC). Justin Everard noted that the FSA communications team would find the document very useful in practice. The Working Group welcomed the document and made the following comments:

- a. The document is practical and concise. Steve's expertise and experience come through in the high quality of the draft.
- b. The document is a sort of distillation of the principles with some strategic and some operational elements; it needs to be clarified how the document will be presented: alongside or incorporated into the principles, or more of an operational document.
- c. The second bullet could be clearer. The Working Group noted in phase 1 that functional separation of RA and RM while encouraging regular dialogue between them creates a tension that requires management.
- d. The third bullet on noting uncertainty and unintended consequences was particularly welcome and it is very useful to have this statement made explicit for the Scientific Advisory Committees
- e. It is important to describe the sources as well as the impacts of uncertainty
- f. Need to add statement on measures that will or could be taken to reduce uncertainty
- g. The principles of risk assessment should outline options/paths for risk management and the evidence and associated limitations/uncertainties associated with these; is that clear enough in the document? Scenario analysis could lead to a change in a risk management decision.
- h. Clarify whether drawing conclusions from uncertainty is the responsibility of risk assessors or risk managers or both.
- i. Last bullet as currently written is open to varied interpretation. Risk analysis is intrinsically precautionary. The wording may be referring to the overuse or misuse of the Precautionary Principle and needs further unpacking to clarify what is meant; such as an alternative approach to precaution without invoking precautionary principle. 'Proportionate' can sometimes be used in place of 'precautionary'.
- j. Change 'foresighted' to 'anticipatory'.
- k. Agree that the terms need to be defined – uncertainty in science would be different to public understanding of the term.
- l. There may be circumstances in which the level of uncertainty is so great as to require deferring any communication until uncertainty reduces.

- m. Public response to uncertainty is affected by the credibility of the messenger and this will need to be reflected in the consideration of communication (see below).

**Agenda item 3 –Communication principles: SC WG2 paper 2-3 Draft risk communication principles**

10. Guy Poppy introduced suggestions for possible communication principles/framework based on discussions he had held with cross-government Chief Scientific Advisers on public communication of science health risks. He noted that following a full checklist of principles could be difficult if time is pressing for example for urgent/emergency communication. The Working Group discussed Guy's suggestions, and the Chair also invited FSA officials to comment on these and how they related to their work to help inform the Working Group's discussion. (Paragraph 8 above is also relevant to the discussion here). The following summarises the Working Group's initial comments -
- a. A principle on proportionality (such as for the FSA to explain why it thinks a certain course of action is not practical, economic or feasible) is a difficult one for risk communicators as it will likely lead to the resources or actions of the FSA being challenged
  - b. The FSA needs to be prepared for the fact that it can follow principles to the letter and still be challenged
  - c. The FSA should think about whether anything would have been different in past cases if it had followed the suggested principles i.e. how would they benefit the FSA?
  - d. The FSA's advice or decisions may not always be to the benefit of all stakeholders (in the sense that there may be 'winners and losers') and FSA needs to be prepared for this in how it communicates; could it be more proactive in briefing stakeholders?
  - e. The FSA should think about what success means for FSA communication; 'not being challenged' does not necessarily mean the communication has been successful.
  - f. There should be a clear distinction between the evidence (and how good that evidence is) and its interpretation to reach a recommendation or decision; the approach should aim to state clearly what the facts are; then state what the FSA's interpretation of the facts are to reach its decision/advice (One example of doing this is the GRADE framework which treats these as separate parts of a process.).
  - g. Communications plans are important. The FSA should engage communications professionals in developing its communications plans at the early stages of the process.

- h. In general terms the simpler the message the more likely it is to be valuable to many consumers

**Agenda item 4: Current approaches to addressing the challenge of risk communication; SC WG2 paper 2-4a and 2-4b - Case Studies**

11. The Chair invited Guy Poppy and Michelle Patel to outline FSA's current activities. They gave an overview of the FSA's current approaches. Guy noted that the Working Group had discussed the FSA's approach through case studies at its first meeting and these case studies were tabled again for reference (on acrylamide<sup>1</sup>, raw drinking milk<sup>2</sup>, and burgers<sup>3</sup> less than thoroughly cooked). Guy and Michelle made the following key points:
  - a. The FSA routinely tests consumers' understanding of the message.
  - b. The responses of a range of stakeholders, the media, the public and other government departments need to be considered and managed. The need to consider each of these constituencies should be explicit in the principles and /or guidance.
  - c. The FSA Board takes strategic-level decisions on its risk appetite and what level of resource it wants to devote to increasing certainty for a particular issue or incident [the desire to be confident it is being consistent across different cases is part of the driver for FSA asking the question this Working Group is addressing].
  - d. There should be more frequent dialogue between risk assessors and risk managers throughout the process (this point was also picked up in Phase 1).
12. The Working Group members made the following points:
  - a. Learning from other organisations might be helpful, for example NICE are good at communicating difficult decisions to 'winners and losers'
  - b. Perhaps frame principles in terms of the different stakeholders
  - c. There are unintended consequences of some communications (e.g. there is evidence that the message to not serve undercooked burgers at home has not got through to some consumers)
13. Guy offered a brief introduction to some ways in which others communicate risk and uncertainty (e.g. the IPCC (%) likelihood scale for conclusions on specific points and the Spiegelhalter 1-4\* scale for overall quality of the body evidence relating to a question or decision) and invited the Working Group's initial comments on whether this sort of approach could be useful for the FSA. The Working Group advised that:
  - a. these approaches were not appropriate for FSA to use 'off the shelf'
  - b. it is important not to confuse weight of evidence, uncertainty and variability

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<sup>1</sup> <https://www.food.gov.uk/safety-hygiene/acrylamide>

<sup>2</sup> <https://www.food.gov.uk/safety-hygiene/raw-drinking-milk>

<sup>3</sup> <https://www.food.gov.uk/safety-hygiene/burgers>

- c. developing something FSA specific might be helpful but there would need to be a clear benefit
- d. approaches would need to be tested with and suitable for the intended audience (policy makers and/or consumers)
- e. separating the facts from the interpretation would be important; the FSA needs a structured quality analysis of the evidence
- f. other scales or approaches may be more appropriate to look at such as those of EFSA, HSE, COT, ACMSF, NICE.
- g. there is a need to guard against over-confidence in assigning overall quality and to be transparent in setting out how judgements on this are made
- h. a key element of successful risk communication is that trust in FSA does not go down as a consequence.

#### **Agenda item 5 Working Group case studies**

14. The Chair invited Working Group Members to present short case studies drawn from their own experience (examples of what worked well or not so well in communication of risk and uncertainty), which they had been asked to think about in advance. The key learning points made by the Working Group arising from discussions of these cases were:

- a. Different recipients/interests will need specifically tailored communications in order for the communication to be successful, although the central message should be the same.
- b. Planning is important – someone needs to take ownership of this
- c. Formal public consultation on planned communications can improve communications and help to reach intended audiences if there is time to do it; it also draws out opinions/reactions that can then be prepared for in advance of the communication going out.
- d. The content of the risk communication should be evidence based (i.e. it should reflect the evidence about the risk being communicated) )
- e. The mode of risk communication should be evidence based (i.e. will it have the desired effect and how do we know it will?)
- f. The need to be aware of and mitigate against unintended consequences (e.g. at the sustainability and safety interface)
- g. There is a balance that needs to be struck between transparency and too much information compared to a simple message for the public health good
- h. Briefing note on the wider risk landscape should inform the communications plan
- i. Highlighting the real/immediate issues of concern can help to bump your lower priority issues down on the scale of public interest
- j. Risk ranking can be a useful tool

- k. It is important to be clear on how the decision on what is an 'acceptable risk' (and to whom) has been made.

#### **Agenda item 6**

15. The Chair set an action for attendees to review the document in light of discussions and further thoughts and provide comments in writing to Gwen Aherne (see actions under item 7).

#### **Agenda item 7 – Outputs and next steps**

16. Sandy Thomas noted that her report to the Board on 14 March will provide a brief high-level update on progress; it will not present any detailed draft recommendations or outputs. The Working Group Chair set a number of actions for attendees (see list below).
17. The Working Group Chair closed the meeting by thanking everyone for their contributions. He noted that the Working Group very much value FSA contributions to the meetings.

#### **Meeting actions list**

**ACTION 1** – Secretariat to work with Michelle Patel to develop a process for ensuring alignment of the FSA and Working Group workstreams on risk communication

**ACTION 2** – Secretariat to prepare and circulate a final draft of the principles on establishing risk and uncertainty for Working Group comments in preparation for formal handover to FSA

**ACTION 3** - Gwen Aherne to circulate and invite comments in writing (in MS word format) on:

- i. full draft minutes of the meeting
- ii. draft risk communication principles
- iii. uncertainty principles document
- iv. the question 'what does successful communication on risk look like?'

**ACTION 4** - all attendees to provide comments on three documents and question and provide comments to Gwen in writing. This should include FSA contributors as well as the Working Group.

**ACTION 5** - Michelle Patel to provide information on other relevant FSA work to Gwen for circulation to the Working Group.

**ACTION 6** - Secretariat to set up meeting with Working Group Chair to develop next steps

**ACTION 7** - Secretariat to set up next Working Group meeting (if necessary by TC).