

Risk Management

Risk Communication

FOOD WORLD INDIA - 2011

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Intent of Legislation

- ☐ Consolidation: Food Regulations
 - ☐ Construction: Science Based Framework
-

Fundamental Shifts

Several Authorities

Single Authority

Adulteration

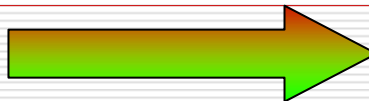
Risk Analysis

Opinion based

Science based

Inspection

Surveillance, Monitoring



Consolidation has happened

Prevention of Food
Adulteration Act 1954
PFA Rules 1955

The Food Products
Order, 1955

The Meat Food
Products Order, 1973

The Milk & Milk
Products Order, 1992

The Edible Oils
Packaging (Regulation)
Order 1998

**Food Safety and Standards
Regulations 2011**

The Vegetable Oil
Products (Control)
Order, 1998

The SE Oil, De-oiled
meal, edible flour
(Control) Order, 1967

Any other Order
under Essential
Commodities Act, 1955

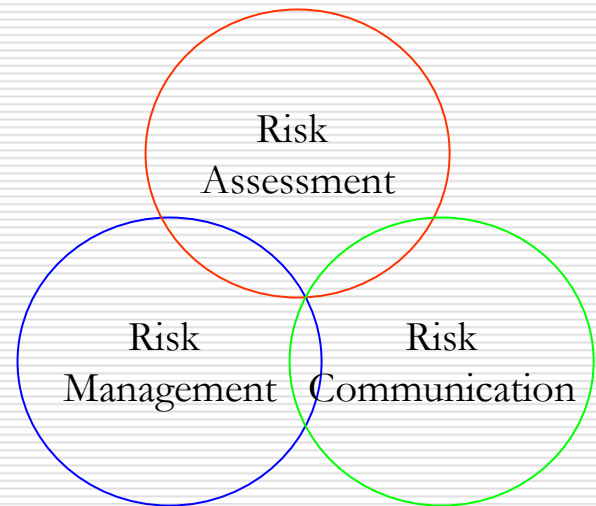
Standards of
Weights & Measures
Act, 1976

Standards of Weights
& Measures (Packaged
Commodity) Rules, 1977

Infant Milk Substitutes,
Feeding Bottles, Infant
Foods Act 1992

Risk Based Framework

Construction



Risk Management -

☐ Policy setting

- ALOP
- Risk ranking
- Populations at risk

☐ Risk Profiling

- What is the context of the safety problem

☐ Option Assessment

- Why 'preferred option' selected

☐ Monitoring Outcomes

- Regulatory Impact Analysis
 - Is the 'Public Health outcome' achieved ?
-

Food Safety & Standards Act - Mandate

- The Act requires while framing regulations to:
 - Determine food standards on the basis of risk analysis [18(2)(b)]
 - Undertake risk assessment in an independent, objective and transparent manner [18(2)(c)]
 - Carry out risk management which shall include taking into account the results of risk assessment . . . [18(1)(b)]
-

From mandate to practice

☐ **Functional Separation** (Para 17)*

- Risk Assessment
- Risk Management

☐ **Functional Roles** (Para 5.1)#

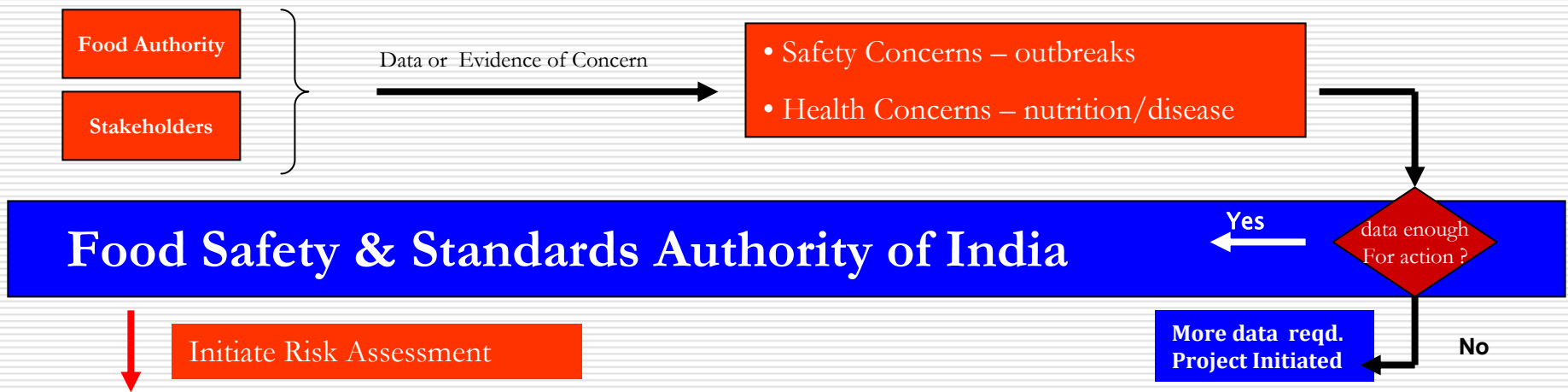
- Scientific Committee/ Scientific Panels (Expert Groups)
- Food Authority

☐ **Performing the Roles**

- Delivering a Scientific Opinion (Para 13)#
- Regulatory Impact Analysis [pg 4, 5, 16]*

*Document: FSSAI approach to drawing up /revision of Standards

#Document: Working Procedures of Issues to Scientific Committee/Panel



Risk Assessment

Scientific Panel

Scientific Committee

- Scientific Opinion
 - Transparent
 - Written in a precise manner

Consultation: Public Hearings, Inviting Observers, Expert Group .

Risk Management

Food Authority

- Regulatory Options ?
 - Do nothing
 - Self Regulation
 - Regulation

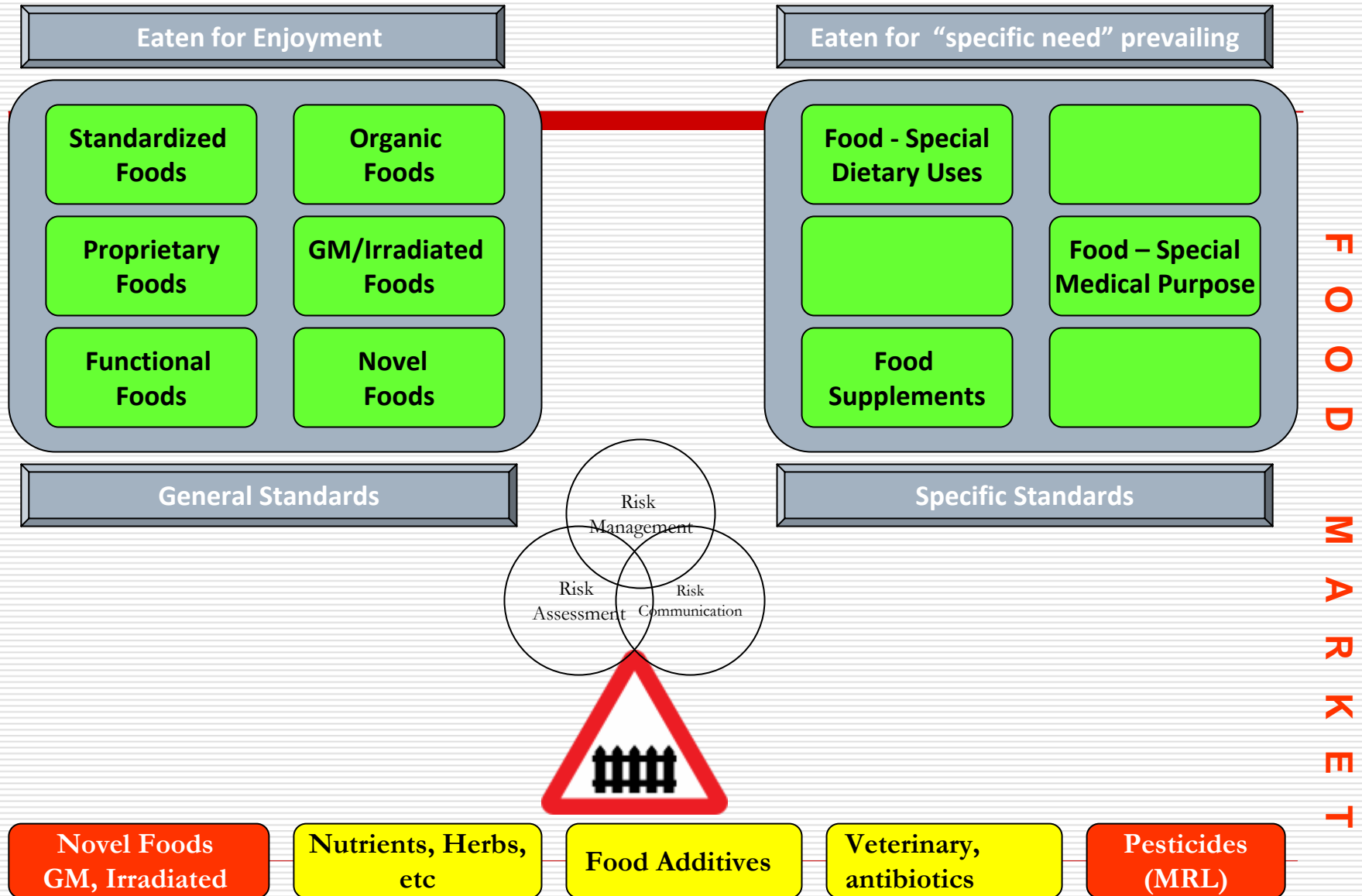
Draft Consultation: 2 Draft Hearings [if required] prior to Final Notification.

Risk Communication

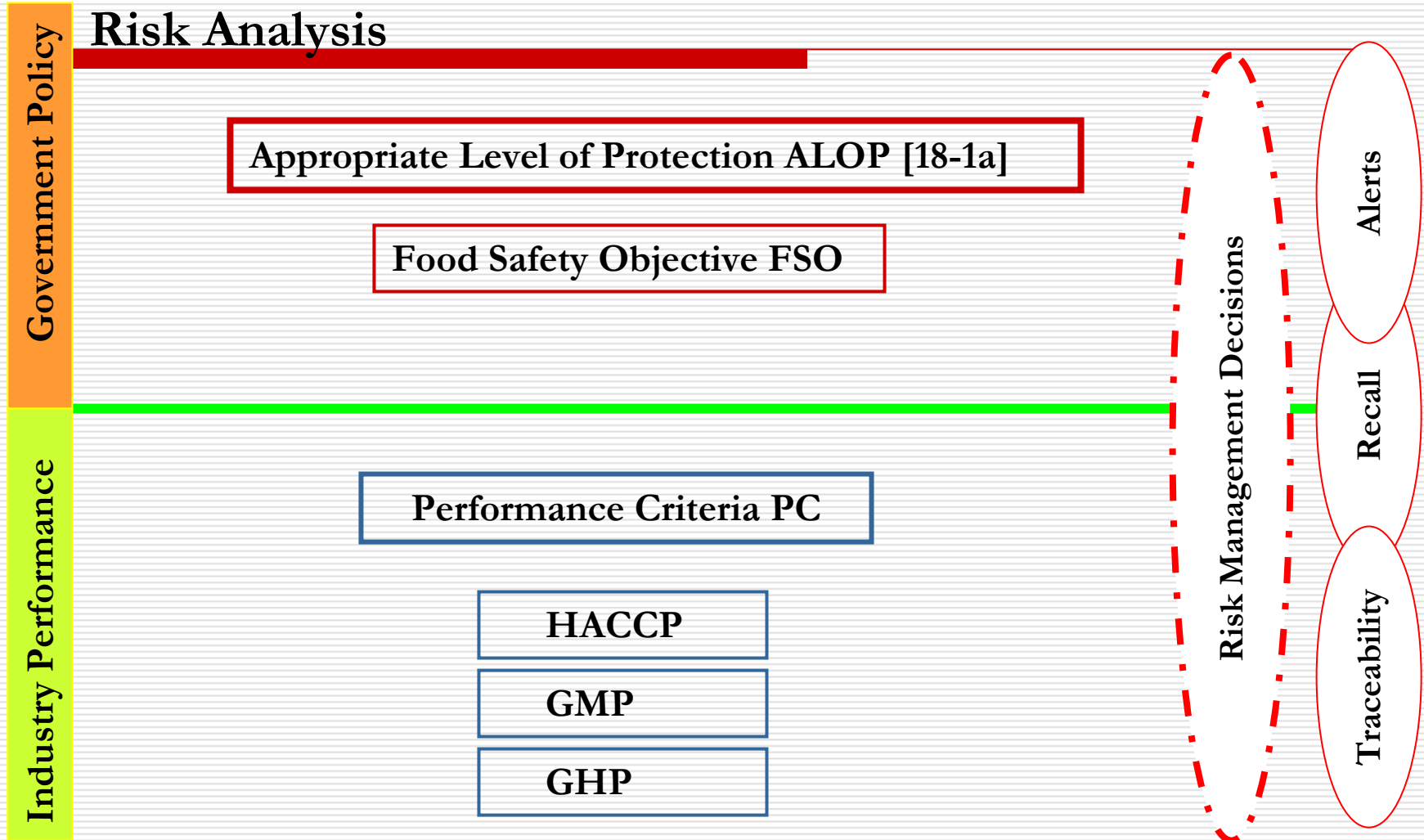
- Scientific Opinion
- Risk Management Options
- Draft Comments
 - Reasons for rejection
- Food Alerts
- Contact Point – Information

The Structure

Risk Analysis Methodology: The Scope



Food Safety Management System - Scope



Risk Management

Considering rulemaking

Risk Management: Regulatory Options

Trans Fats

Year	DANISH FOOD AGENCY	US FDA
1991	No Action	No 'listing trans fats' on label
1994	Recommend reduced intake - EU	Ruled to include "Trans with SFA" label
1998	EU refuses action – lack of evidence	
2003	Reviewed evidence – meta analysis	Ruled 'separate line for trans' label Trans consumption ~ 5.8g/day
2004	<input type="checkbox"/> PRODUCT REGULATION	
2006		<input type="checkbox"/> LABELING REGULATION

Harmonized with Codex

Risk Profile: Caffeine Intake

Coffee

Per Capita kg

Norway	9.9
Denmark	8.4
US	4.2
UK	2.4
India	0.2

Table 2: Per Capita consumption of Company Products all carbonated beverages^{8,6}.

Country	No of Serves (250ml can)
India	7
China	28
Japan	176
UK	198
Canada	237
US	412

o Scientific Opinions

o FSANZ

o EFSA

o Risk Management Options

o US/Canada/EU/Australia- New Zealand

Safety Context - Introduction of Energy Drinks

Regulatory Impact Analysis

Labeling added sugar : GSR 664

Total Available	17. 52 MMT, 2007*		
	On site	Packaged foods	Comments
Direct Household	6.75		HIG consume twice more than LIG
Industrial Consumption (5.26)		3.99*	*Carbonated drinks, bakery, confectionery, fruit drinks
Small Business/Coffee shops etc	5.51		3.25 alone by Halwais (58%)
Total Consumed	12.26	3.99	
<i>3 times more consumption in sector where labelling rules have no writ</i>			

Country	Per Capita, Kg	
	Biscuit	Chocolate
India	2.1	0.3
EU	10	10

*AC Nielsen Survey 2007: KPMG Analysis

Risk Communication - Purpose

- **Establish Scientific Authority**
 - 'Food scares' are popular news
 - E.g. GM Foods
 - Trans fats,
- **Gain Consumer Confidence**
 - Why Countries have different Standards
 - Exposure analysis
 - Dietary practice

Challenges in Risk Management

☐ A Food Safety Management System

- ☐ Not only for 'packaged foods'
- ☐ More people are eating 'out' or 'on the move'

☐ Newer Technologies

- ☐ GM Foods, Nanotechnology
- ☐ Novel Foods

☐ Global Supply Chains

- ☐ Cross country contaminations
 - ☐ Exotic risk issues
-

Risk Management is about . .

Improving Health & Safety Outcomes



Thank You

“Washington is a town where people say they are for science-based decision making until the overwhelming scientific consensus leads to a politically inconvenient conclusion.”

Sherwood Boehlert: Chairman: House Science Committee, US