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CONSUMER INFORMATION AND PARTICIPATION IN INTERACTIVE COMMUNICATION WITH CONSUMERS ON FOOD SAFETY, RISKS AND FOOD QUALITY.

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1. Introduction

Independent consumer organizations are essential elements in the interactive communication process with consumers on food safety, risks and food quality. Within the European Economic Area, at least, these organizations enjoy a very high degree of public or consumer confidence, as compared to other sources of information or advice. Consumer organizations are regarded as trustworthy by most Europeans (55%), just ahead of the medical profession (53%) and environmental protection organizations (45%) but well ahead of universities (26%), animal protection organizations (25%), television and newspapers (20%), international institutions (17%), national public authorities (15%), farmers' associations (15%) and religious organizations (9%) according to the findings of a Eurobarometer Poll in 2000.

Elsewhere in Europe, with some exceptions, independent consumer organizations are of relatively recent origin but are well placed to win public confidence, given the right support. They must be supported (and their independence protected) as an essential contribution to public discourse and decision making on food and food policy.

People are often more influenced by bad news than persuaded by good news. The influence of consumer organizations can be somewhat asymmetric although the same can be said about other NGOs, the media, politicians and others. Bad news travels faster and further than good news.

Nonetheless, independent consumer organizations are significant factors in forming public perceptions of food safety risks and quality. Therefore the participation of consumer organizations in policy-making is essential.

2. The Need for More Information

There are a number of current developments that increase the importance to consumers of having more information about food, food production and food ingredients:

2.1 Internal Market/Enlargement/Globalization

As a result of the Single Market, progressive enlargement and globalization, food and food ingredients may come from more countries than before and travel through many more different paths to the ultimate consumer. The fact that food is handled by an increasing number of players before it reaches the final consumer increases the opportunities for contamination unless there are strict controls. Furthermore, global markets also mean that we are at risk from food safety hazards from around the world. Problems may also arise in ensuring full compliance with Community norms for products originating from outside the Community, including some candidates for EU membership. With regard to the veterinary and phytosanitary aspects of the enlargement process, there is a low level of compliance with EU rules according to David Byrne, Commissioner of Consumer protection.

2.2 Eating Habits

There are many changes in eating habits including a move towards greater convenience. Consumers are more often eating more processed more handled or more packaged food than before.

2.3 Changes in Production

For many reasons, food production and processing are continually changing. In many cases production is becoming more intensive, and more industrialized, with higher inputs at production level such as pesticides or fertilizers.

2.4 Changes in Distribution

Nowadays, even very small enterprises may supply ingredients for a very wide range of food products from different countries.

2.5 Changes in Composition

Consumers are consuming a wider range of food, food ingredients and food additives than ever before.

2.6 Consumer Sentiment

In Europe, consumer confidence in food safety is increasingly volatile. Environmental and other factors are becoming more important.

In a single market such as the EEA and the enlarged EU there are no internal border controls. Consumers need to feel confidence in the production, processing and regulatory regimes of other countries.

3. Risk and Consumer Confidence

I will now consider some of the factors that might help to inspire consumer confidence in risk assessment and risk management and also how best to communicate (and listen) to consumers in this process. A necessary but not sufficient condition is that consumers must have the right to be informed about, and to participate in, the making of public decision affecting them. Participation is essential to communication. Access to information is also essential, not only as to the content of decisions but also as to the processes and procedures by which decisions are reached. This must include access in good time to the arguments and documents submitted by all interest groups. This must be achieved before decisions are made, so that submissions by any one interest group may be subject to scrutiny and challenge in proper cases. Public hearings and other ways of testing different views against each other are also essential elements of the policy making process.

The European Commission is making efforts to improve consumer participation and access to information but still consults too often on a private basis separately with different interest groups. Proposals for the new European Food Safety Authority show an encouraging commitment to transparency but it is essential that all submissions to the authority should be publicly accessible.

(The same specific and general considerations of course should apply in relation to other bodies such as FAO/WHO and Codex Alimentarius).

Obviously it is impossible to involve each and every consumer in policy making. Which consumers and which consumer organizations should be involved? Questions of legitimacy and "representativity" can be raised and have to be handled in concrete terms depending on the circumstances of the case, but again the key element is the degree of openness of the decision-making process generally.

Membership on advisory committees for this or that consumer organization is not sufficient in itself. Participation in such committees is essential but may not confer much influence. We must look at the totality of the policy-forming and decision-making process. The process of consultation and policy-making must itself be so open and transparent as to allow many different individuals and groups representing different interests to contribute if they so wish.

Above all, it is essential to avoid any implicit or explicit assumption that food policy is largely a matter for officials and experts (and industry). Consumers have a complex relationship with their food and will not simply accept that someone else knows best.

Again, the totality of the policy making process may have an important influence on crisis management, an issue that has assumed greater importance in recent years. Of course it is good to improve crisis management but the ability to manage crises will depend crucially on what is done before, rather than after the crisis arises.

4. The Role of Science

The decision-making process must be based on good science (what else?) but that is not enough. Consumers do not have a great deal of faith in scientists in this domain. According to a recent Eurobarometer¹ Poll, consumer trust in scientists is somewhat ambivalent. Of those polled, 42.8% agreed and 42.3% disagreed with the proposition that "scientists are responsible for the misuse of their discoveries by other people".

Although the two overlap and are inter-related, a distinction is rightly made between risk assessment and risk management. Management is seen as a political or policy issue and assessment as more of a scientific question. Risk assessment should be based on (good) science but not only on science; it is not a matter that can be left exclusively to scientists. Here too consumers and their representatives must be involved.

Should consumer representatives sit as a matter of right on scientific advisory committees? The experience in the UK is positive but elsewhere practices are different. However, for any risk assessment process, consumer organizations will want at least to know the following:

1. How was the problem framed?
2. What factors were taken into account in the assessment?
3. How was the assessment process managed?
4. How were uncertainties identified, measured or treated?
5. How did internal discussions proceed in the assessing body?
6. Who are the members of the assessing body, how were they appointed, what is their background?

Points 1 and 2 above are particularly relevant; we must look for ways for consumer organizations and others to participate in discussions on these points, and also in the process of selecting members for scientific committees.

5. A Better Understanding of Science

If scientific advice and opinion is to be communicated to consumers and consumer organizations, we need a better understanding between scientists and consumers. With the support of the European Commission, BEUC the European Consumer Organization is launching a consensus project that will include a series of structural dialogues between consumer experts, scientists and other interest groups. We hope to increase mutual understanding and also to identify (and to expand?) those issues on which a broad consensus exists.

¹ » http://europa.eu.int/comm/dg10/epo/eb/eb55/eb552_sctech_key_en.pdf

6. Marketing Claims

In communicating with consumers about food, food labeling, packaging and advertising plays a critical role. The changes in food composition and distribution, and changing consumer attitudes and habits mentioned above all mean that labeling is becoming more important.

Clearly labels should never mislead but they should also provide clear intelligible information about, *inter alia*, such matters as quantity, composition, nutrition, instructions for conservation and use, allergens, and novel products/processes (especially genetic modification). While the primary source of information for the consumer should be by way of product labeling, there are now new possibilities of using web-sites and other technological means as a source of supplementary information.

Consumers' perceptions are shaped not only by labeling but also by marketing claims. These claims appear to be proliferating and there is strong pressure to permit more use of them (e.g. functional and nutritional claims, claims for fortified food and food supplements etc). While attempts are made to ensure that individual claims are not misleading, we know very little about the cumulative effect of marketing claims generally on consumers' perception and understanding of food and food issues. As a matter of speculation, they may cumulatively have a "dis-educational" effect and I would recommend further study of the matter. END

7. Recommendations

7.1 Consumer confidence in food quality and safety can only be achieved by a comprehensive and integrated approach to food policy that includes, *inter alia*, the following elements:

- Representation of all stakeholders with particular emphasis on consumers, not only officials, scientists, decision-makers and industry representatives.
- Specific open consultation with the public at large and their representative consumer organizations
- Inclusion of "other legitimate factors" such as ethical and religious concerns, the desire to promote more sustainable food production practices, and many other things that consumers value, may affect consumer health only indirectly,..... of concern to consumers in policy making
- Interactive dialogue with scientists, risk managers, consumers and consumer organizations, to promote better mutual understanding and better risk communication
- An increase in the public understanding of science through initiatives to communicate and disseminate the findings directly to consumers is necessary
- Full transparency in scientific advice and in the decision making process.
- Effective two-way communication with consumers and their organizations on an ongoing basis (and not only when problems arise).

7.2 Scientific advisory committees, their decision-making processes and outcomes must be of the highest integrity: their procedures must be open, transparent and accountable, to consumers and the organizations that represent them, particularly on:

- the selection and appointment of members
- procedures and working practices

- framing the question to address and the factors to be taken into account in the decision-making process.

Question for Discussion: Should scientific advisory committees include consumer representatives, perhaps in the form of experts nominated by consumer organizations or as public interest / consumer / lay-members of such committees?

- 7.3 Governments should support the development of strong independent consumer organizations as an essential element in public discourse and an essential voice (among others) in the decision-making process.
- 7.4 Submissions on policy issues to public bodies should always be published promptly when they are received and above all in time to allow other interests to comment on them.
- 7.5 The overall contribution of commercial claims to consumers' understanding and misunderstanding of food issues needs urgent examination by the appropriate bodies.

Independent consumer organizations are essential elements in the process of communicating with consumers about food and food risks. This process of communication has become more important in recent years because of changes in food production, composition, distribution, processing and origins, combined also with changes in consumer habits and attitudes. The effectiveness of interactive communication about risk assessment and management will depend on the overall openness and transparency of the assessment, decision-making and scientific process. Efforts are also needed to increase understanding between consumers and scientists. Communication with consumers carries on against a background of marketing claims; more study is needed on the overall cumulative effect of such claims on consumers' understanding and mis-understanding of food issues.