

FPA

Market and Management Advice



Assessment of the Current Image of the European Food Safety Authority

Interviews with interested parties and stakeholders

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FPA g.c.v.

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Introduction & Acknowledgements

It was an honour and a privilege, personally and professionally, to be allowed spending so much time with so many leading European experts – and their teams - in the area of food safety and receiving such open, high-quality, constructive and helpful comments that will certainly contribute to EFSA becoming an even more essential link in the European food safety network and a true partner for all of you, and, ultimately, providing even better service to the European public.

Thank you all for your co-operation,

Frederic Paeps

Objectives

The EFSA Executive Director and management team recently initiated a working programme to assess the Authority's current image and performance, and to outline a clear vision for the future.

The first phase of the programme consisted of an internal assessment and ideas which the Authority would now like to validate and complement with the external perspective. For that purpose a number of interviews with a small, but representative group of EFSA's key stakeholders and other interested parties was planned.

The key objectives of these interviews are :

- to get information about the overall image of EFSA
- to get information on stakeholders' expectations and EFSA's performance so far
- to get information about specific areas of EFSA's competence (science + communication)
- to get ideas on what should be done to further improve performance

Together with the internal assessment, these interviews will provide EFSA with a more complete and balanced view on the Authority's current image and performance, but most of all they also provide the EFSA management team with perspectives of a very high quality and a great number of ideas and suggestions on how to further improve its performance for the future.

Methodology

Qualitative research.

The approach consists of semi-structured interviews with representatives of key stakeholders and interested parties of EFSA :

- EU Commission
- EU Parliament
- Member States Food Safety Agencies
- Scientific Panels
- Industry
- Consumer
- International Press Agency
- NGOs
- Other government agencies with food safety accountabilities

Most of the interviews took place with the organisations' leaders, often accompanied by one or more members of their teams. This gave a good mix of feedback on EFSA's performance on a day-to-day operational level as well as a more strategic level where networking and political aspects are of critical importance.

In total, 21 people have been interviewed.

The questions broadly cover all aspects of EFSA's areas of activity but also aim to clarify stakeholders' expectations and to obtain their personal perspectives on other aspects such as the Authority's service-mindedness, accessibility, capacity to listen and learn etc.

All interviews were recorded on tape which together with written notes have served as basis for this report.

The interviews took place between 5 March and 15 April.

Introduction

- Too early to tell...

All interviewed parties were quite aware that EFSA is still just starting, and that things are evolving as we speak. While the interviews were taking place there was also an EFSA Board meeting and an Advisory Forum meeting; we could clearly feel that certain perspectives were evolving, and evolving in the right direction.

- Differences...

EFSA certainly does not leave people indifferent. Everyone had an opinion and was keen to share it with us. The vast majority of these opinions were positive or at least encouraging, although there clearly are certain areas EFSA must address.

- Positives...

Most positive comments on EFSA came from consumer, industry, press, the European Parliament and countries. This is an interesting observation in the light of the context in which EFSA was created and its key objective of restoring consumer confidence in the safety of food. Key positives of EFSA are their people, the high quality of the EFSA opinions, the significant improvement in communication of risk and their achievements in bringing the Member states closer together on the road towards a true network. There were mixed feeling about the first "big challenge" of EFSA, i.e. semicarbazide, but the vast majority felt they handled it very well and indefinitely better than the previous structure.

- And negatives...

Most negative comments or rather, concerns, come from the European Commission, NGOs and...again (other) countries. EFSA cannot itself be blamed for the slow start-up, but this created a lot of negative momentum and backlog...and there is little patience ! In spite of EFSA not being fully operational for more than 6 months at the time of the interviews, there is concern about the quantity of opinions, and even more, about EFSA not meeting certain deadlines. This is an important area that EFSA has to address; this also highlights the need to better communicate priorities and work programmes/workload. Many are of the opinion that EFSA is not sufficiently clear about its priorities and programmes. Hence there is concern that they do not get their priorities right and are spending too much time on self-tasking.

- Opportunities...

There is a shared feeling that there is a good team in place, which will definitely lead to lead to continuous performance improvement.

Also, the countries strongly underline that EFSA ought to better leverage their combined resources to build a true food safety network. If that happens, the capacity of EFSA would significantly increase and nothing would get in the way of EFSA achieving its mission...

Feedback

1. Context

Everyone of the interviewees – without exception - agreed that EFSA was a good idea and that the Authority plays a key role in restoring consumer confidence after a number of serious food scares across Europe (BSE, dioxins...). The fact that the Authority was set up and operates as an independent body is seen as sending the right signal to the European consumer and avoiding concern about subjectivity and political influence.

To better situate the context against which EFSA is operating, the sessions began with the interviewees' overall perspective on food safety in general.

In fact, it appears very hard to tell whether food safety in general has been improving or not. More and better controls will inevitably lead to more findings but there is not a clear total picture. Regarding a next food scare or crisis, the question seems to be 'when' and not 'if' there will be one.

This next scare will likely be due to issues relating to globalisation of the food chain (avian flu...), discovery of new substances found in existing food, sometimes production-related sometimes ingredients-related such as certain herbs etc..

Finally, but perhaps the most difficult to anticipate, there will always be the risk of mismanagement and criminal acts.

GMOs and new technologies do raise a lot of questions and concerns but these experts believe less so directly relating to food safety rather than biodiversity and other, eg social aspects.

The arrival of new member states into the EU is seen as a lesser risk.

There is strong consensus that the biggest issue regarding food safety is none of the above, but rather our western diet i.e. 'abuse' of otherwise perfectly safe foods due to wrong eating patterns.

All agree that a next crisis – and hopefully the prevention of that crisis - would be the only real way to truly assess to what extent EFSA is really ready and doing well.

2. Overall impressions of EFSA

Four key observations drive the overall impression of EFSA :

1. The perception of EFSA is predominantly positive : high-quality opinions and strongly improved communication
2. EFSA employees are seen as competent, communicative and service-minded.
3. The slow start made a bad impression
4. The jury is still out

2.1. The perception of EFSA is predominantly positive.

The overall image that EFSA projects among its stakeholders is quite positive. Statements ranged from "has already established its authority" to "doing a good job", and "brought the countries closer together".

- Most positive are consumer and industry organisations, the press, the European Parliament, and Science panels.
- The Member States and the Directorates-General of the European Commission are somewhat divided and opinions vary from extremely positive to neutral to concern, and also some disappointment.

The quality of the scientific opinions of EFSA is mostly described as excellent and only rarely contested, and communication – although still a hot and debated topic – is seen as much better managed than in the days before EFSA.

Among EFSA's key success factors to date are the fact that they have strongly improved the communication with and among the member states' food safety agencies and the fact that, especially for other European wide operating institutions (industry, consumer representations...), there is now one point of contact.

There is some disappointment about the productivity (number of opinions) and concern about deadlines. There is a certain irritation, especially at the Commission, about EFSA's focus seemingly biasing towards topics with high media interest rather than other often more complex assessment work which is essential to underpin policy and legislation.

The actual performance of EFSA will be commented further.

2.2. EFSA employees are seen as competent, communicative and service-minded.

This was spontaneously brought up by just about all of the stakeholders and interested parties. It inspires confidence for the future of EFSA and indicates that, with better processes and time, this strong team will inevitably achieve better performance.

In that context the move to Parma was mentioned by many as a true challenge to keep and develop this team.

2.3. The slow start made a bad impression

The start-up of EFSA was perceived as extremely slow. There is wide agreement that this was largely caused by 'politics', and that EFSA was somewhat caught in the middle. Yet it does negatively influence the EFSA image for a number of respondents who would have expected things to go quicker, especially considering the context of serious consumer unrest in which the Authority was set up.

Hence there was a sense of frustration that for many aspects of EFSA the answer still had to be "it's too early to tell". Interesting is that this kind of response actually grew less as the field work of this research progressed. The period coincided with a period of high EFSA activity with new opinions, and meetings of the Board and the Advisory Forum. Also the new website had just been started up.

2.4. The jury is still out

Most respondents say that there are good and hopeful signs that things are moving in the right direction but there is also the feeling that – in the absence of a new scare - EFSA hasn't yet been seriously challenged.

3. Understanding and Expectations

It was very surprising to find so many and so many different expectations about what was captured in three paragraphs in EFSA's founding Regulation :

"The Authority shall provide scientific advice and scientific and technical support for the Community's legislation and policies in all fields which have a direct or indirect impact on food and feed safety. It shall provide independent information on all matters within these fields and communicate on risks. The Authority shall contribute to a high level of protection of human life and health, and in this respect take account of animal health and welfare, plant health and the environment, in the context of the operation of the internal market. The Authority shall collect and analyse data to allow the characterisation and monitoring of risks which have a direct or indirect impact on food and feed safety". (Extract from the founding Regulation of EFSA)

Stakeholders and interested parties all agree that the expectations from EFSA are huge and EFSA's success will largely depend on its capacity to align and manage many different and sometimes completely opposite positions from its stakeholders and other interested parties.

Understanding and expectations about EFSA's mission :

1. There is good awareness about the core mission of EFSA.
2. There is much confusion about the other aspects of the mission.
3. There are very different opinions as to how EFSA should act and where the priorities should be.

3.1. There is good awareness of EFSA's core mission

All stakeholders and interested parties are quite well aware and agree about the core of what EFSA is supposed to do, and all have mentioned science-based risk assessment and communication as key deliverables of EFSA.

3.2. There is much confusion about the other aspects of the mission

The discussion revolves mostly around two aspects :

- (a) The extent of the advice, e.g. should EFSA cover the risk of the actual substances, or the entire diet and eating habits. Some voice concern that too broad a definition of risk (i.e. inclusion of the total diet) would broaden EFSA's scope too much and potentially divert from its priority focus on the safety of the food chain; others maintain that the biggest risk is indeed our western diet and hence, EFSA should be very actively involved in this area.
- (b) Almost everyone agrees that separating risk assessment from risk management is probably the best model for a European organisation; Yet there is much debate about the 'gray zone' between risk assessment and risk management. The intermediate solution, i.e. that EFSA's opinions should include management options is by no means accepted by all :

- some feel that too harsh a separation between risk assessment risk management would break the continuum and could potentially hamper good management.
- others, especially the Commission, are concerned that the options could be too directive for the risk managers.
- finally, certain countries, are concerned that the formulation of management options could give way to 'unhealthy' trading-off discussions between the Commission and EFSA and erode the independence of EFSA.

3.3. There are very different opinions about how EFSA should act and manage priorities

(a) How to determine EFSA's workload and set the priorities ?

- Again, everyone agrees that the EFSA task list is quite impressive but there are very different perspectives on perceived and real priorities...
 - For the Commission there is the question whether 'self-tasking' is a good idea and if EFSA should not be working first and foremost on the Commission's projects.
 - For other stakeholders and interested parties there is the feeling that the Commission sets EFSA's agenda, and that resource allocation is potentially driven by response-to-request rather than by magnitude of potential risk.
- What is the role of the EFSA Board in setting priorities or work planning ?
 - The Board, its composition and modus operandi were quite often cited as a mixed blessing for efficient planning at EFSA : the Board covers a wide range of interests which can indeed ensure objectivity or at least prevent too much focus on one or more particular areas, but at the same time it can also lead to immobility and compromise when there is too much direct intervention into the day-to-day operation. In general it was felt that the Board should be more remote from daily operations.

(b) How should EFSA operate ?

- The position and roles of EFSA in relationship to the different networks is unclear; this is especially the case for the countries.
 - They all agree that EFSA has brought them closer to one another but they also feel that there is still a long way to go and different countries have quite different opinions about the best way forward.
- Especially the bigger countries are of the opinion that EFSA could make better usage of their expertise and resources
 - by aligning methods and processes (expert selection criteria, standards...)
 - by 'outsourcing' projects to the countries
 - hence avoiding duplication and contradictory results.

There is strong consensus that the expectations about EFSA are huge, and many would like to get a clearer definition of the Authority's roles and a better view on its activities.

There is a strong desire to better understand whether the focus is right and whether there is not a need to revise or amend the mission now that there is operational experience. In that context it was also suggested there could be a stronger link to the European Parliament than is currently the case.

It was extremely positive to note that all contacted stakeholders and interested parties , without a single exception, explicitly stated their desire and commitment to help EFSA succeed.

3.4. Expectations from EFSA : Summaries

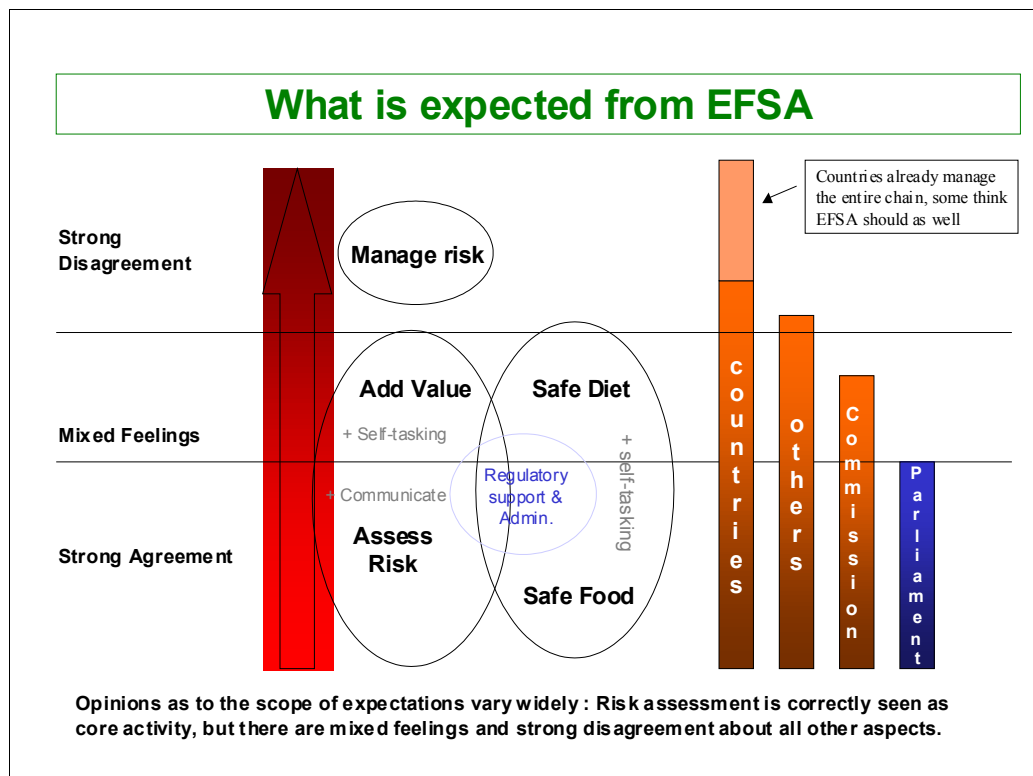
- Summary 1 : Expectations by type of activity

This table lists specific activities that were spontaneously cited by the interviewees as belonging to their expectations from EFSA, illustrating reasonable agreement on EFSA core activities

Expected EFSA Activities	<u>DO</u>	<u>DON'T DO</u>
Independent scientific assessment and communication of food safety risk	All	
Restore consumer confidence	All	
Underpin Commission policy making	All	...but not only that
Harmonise European opinion/perspectives	All	
Coordinate countries - create food safety networks	All	
Involvement in nutrition policies (profiles..)	Some	Some
Set European standards : methodologies, scientist selection criteria...	Most	
Build reference libraries	Most	
Risk Management	Few	Most
European Contact Point	Some	
Opinions with (management) Options	Most	Few
Product/Substance Approval Administration	Most	Few
Validation of claims	Most	Few
Self-tasking	Most	Few

- Summary 2 : Expectations by respondent categories

This table illustrates the level of agreement on the different activity types and the scope of expectations by the various interviewed parties. One of the most-cited concerns is the risk of over-burdening EFSA with administrative tasks such as building huge reference libraries or getting too involved in assessment and communication of safety of diets vs evaluating the safety of substances.



3.4. Understanding and Expectations : some key statements

These are some of statements/expressions that were used by the interviewed parties to express their expectations from EFSA :

- Should be independent
- Coordination of MS / create network / set standards
- Exclusive focus on public health and sanitary safety
- They should not get too close to industry, the Commission
- Restore consumer confidence
- Rank real risk
- Harmonise European positions
- Involved in policies...
- Risk management: why can it work in the countries and not for Europe ?
- Claims / nutrition / total protection
- (assessment of nutrition) Claims is for policy makers : too much admin for EFSA
- There should be clarity on work programme + updates to the Parliament
- Registration of gmos is not the task of EFSA (it is another debate i.e. biodiversity etc.)
- EFSA was set up for risk avoidance not for product approval and administration
-> the evaluation of EFSA performance will be on its capacity to assess risk.
- One central contact point
- Guaranteeing the safety of production
- Scientific assessment – communication
- Put the risk in the right perspective
- Information resource
- Exaggerated expectations
- No longer duplication between country efforts
- EFSA should add value for policy makers -> building databases etc.
- Clarity is very important (a bad example was 'statement vs opinion' re. semicarbazide where the term 'statement' was introduced, this only created confusion...)

4. EFSA's performance

As already indicated in the overall impressions, the general perspective on EFSA's performance is rather positive but there are certain areas that must definitely be addressed.

4.1. Overall performance

4.1.1. What is EFSA doing well ?

1. The quality of the opinions is mostly described as very good. There is quite broad agreement that the output of EFSA is of a very high standard, with feedback such as 'state-of-the-art' and 'impressive'. Only one of the interested parties is rather negative, stating that EFSA has not brought the independent and objective 'new look at old things' that they had expected (more details in the feedback on 'science').
2. One of the very strong positives of EFSA has been the fact that they have brought the countries closer together. Communication flows are better and EFSA is seen as a switchboard and mediator.
3. Since EFSA's start-up, some other European representations such as press, consumer and industry really feel the benefit of a true European contact regarding food safety. Previously it was very difficult to have the same quality of dialogue with the Commission and/or with Member states. It was not clear who was managing what and relations were described as 'more political'.
4. The EFSA staff is very often described as extremely helpful and service-minded. One stakeholder described it as : 'You don't have to tell them twice. They (nb. in this case the communication department of EFSA) listen well and next time, it's done'.
5. 'They communicate well'...coming from the Press, this must be a compliment ! There are varying degrees of satisfaction on the communication skills of EFSA (see further) but in general everyone agrees that it is better than before the creation of EFSA. There is a feeling EFSA will succeed, provided sufficient effort and time (of EFSA and stakeholders) is put in practical exercises and training.
6. EFSA serves as a reference and a resource, especially for smaller countries without huge science-based food safety infrastructures, but also for industry and consumer organisations. There are huge expectations from EFSA in this area, from Consumer, Industry, Countries and the Commission.

Some key statements that illustrate the positive performance of EFSA :

- EFSA is really an ally of local food safety authorities, many (esp. smaller) countries share this point (country)
- Good structures and the people are efficient and open (Scientific panel)
- Quality of the opinions is state-of-the-art (Commission) – it is impressive (Parliament)
- They communicate well (Press)
- They inform national agencies very well and in time (Country)
- Communication is much better than in the days of the Commission when we would get absolutely no warning (Country)
- Semicarbazide, their first challenge, was extremely well managed (Industry)
- Communication works very well now – it's a step-change (industry)

4.1.2. What is EFSA doing not so well ?

1. The quantity of opinions is seen as very low. This was especially mentioned by the Commission but also the countries seem somewhat puzzled by the number so far. In fact, on second thought, respondents do realize that EFSA has only been operational since the middle of 2003, so to a certain extent this point can be attributed to the slow start-up mentioned earlier. Still, it is important and EFSA should assess whether this is just a matter of time or if there is something that needs addressed.
2. Stakeholders do not have a clear view on EFSA's activities, priorities and work plans. Some simply haven't tried to check on the website, others found this part of the website quite confusing and very difficult to read or to understand in terms of priorities. Especially the Commission have the feeling that EFSA is doing too much by way of self-tasking and not putting enough focus on the requests that the Commission sends out to them.
3. In the same context, the Commission is very concerned about slipping time-tables. According to its mission, EFSA should produce an opinion, for instance on GMOs in 90 days, there are very/too often additional questions and requests for additional information causing delay. This was not the case for the first two opinions, but on more recent ones there is concern. At the same time everyone (including the Commission) agrees that the time constraints put on EFSA are tighter than for example on the Member states (105 days to respond and the clock stops when there are additional questions).
4. The Member states are somewhat divided as to their and EFSA's role in the European food safety network. They all see the benefits brought by EFSA in better coordinating, communicating and aligning Member states, but at the same time they expect more leverage and recognition of the country network as a privileged partner. All recognize that the situation as it is (and was) leads to unnecessary duplication, even contradiction, and also that the information flows between the countries is far from perfect. Now there is a network and all are looking at EFSA as to how to use it effectively. Yet the authority of EFSA should be more in its operational competence rather than in some form of hierarchy. It is acknowledged that the Advisory Forum group is made up of very different people around the table, with different cultures, competencies, hierarchical levels etc. The countries are very willing to help identify processes and put them in place but EFSA should take the lead. Another challenge is that the representatives of the Advisory Forum do not necessarily represent the total food safety chain of their country and these other organisations are also looking at EFSA for information and communication.
5. Most stakeholders express a strong desire for EFSA to put more effort in developing and promoting standardised procedures and to deliver more other added value such as reference libraries...there is understanding that EFSA is still a very young organisation but at least they would like to see some sort of road map.

Some key statements that illustrate performance weaknesses

- A bit difficult to keep track of what they're working on - that would be interesting to see..
- Opinions come out of the blue...
- EFSA should be asked to give an activity update to the Parliament
- The work programme is not sufficiently clear, there is a risk that countries work on the same programmes.
- We noticed they went into independent activity, it is their good right, but where is the priority ?
- The way in which EFSA is structured is an issue as it encourages a lot of duplication, work schedules are not clearly discussed and there is the issue of confidentiality...we don't want competition, we want co-operation.
- EFSA seems not to have a very clear view on what they want to do; work programmes are not aligned.
- The role of the Board is a bit dubious, they should not get too involved in the day-to-day programmes

4.2. Specific areas of performance

4.2.1. Science

1. The EFSA opinions are generally seen as of very good to outstanding quality. There is actually only one negative comment : it was mentioned that in one particular area, EFSA contented themselves with just building on existing reports ('already outdated by new US research') rather than starting afresh.
2. Especially smaller countries and European industry and consumer organisations clearly state the benefits of EFSA. Over time they can see EFSA centralising and coordinating all food related risk assessment, i.e. effectively replace country organisations in this area.
3. The most mentioned point of criticism is actually the low number of opinions to date ; but there is a good feeling that the pace will accelerate with the new Director of Science now in place.
4. There is debate about the composition of the panels. Some consider that nationalities do play a role i.e. that there is a tendency to go for 'balanced' panels rather than just pick the best people even if they are all from one country. Others, especially among the Member advocate that the selection procedures should be harmonized between all partners of the network; this to avoid duplication, mistrust and competition.
5. There is concern – sometimes contradictory – about where the priorities should be. One of the key issues is the matter of self-tasking next to or as opposed to Commission-led programmes. Other questions are whether non-priority or 'no-issue' panels suck up too many resources and whether there should be more than one panel for high-priority areas. All in all it comes back to the question on clarity and - probably even more – common understanding, agreement and then respect for these principles.
6. Most interviewees express their concern about the move to Parma, putting a heavy burden on the logistics especially for scientists who will be spending a disproportionate amount of time on travel. There is concern that some outstanding scientists may be less motivated to work for EFSA under those conditions and that hence the scientist pool may become too small.
7. Finally, many stakeholders are of the opinion that much time and money could be saved through more in-house scientists i.e. that not every single issue needs extensive and time-consuming panel consultation.

Some key statements that illustrate scientific performance

- The opinions are state-of-the-art...
- There is extreme caution towards the Commission and we do not need subtle distinctions such as between opinion and statement....EFSA should be above all that...
- We must be careful that young people are willing to take out the time to travel to Parma...it would not be right to have too many semi-retired or retired scientists working on the issues
- Selection procedures give potential to opposite views, hence unproductive.
- The confidential nature of the work for EFSA can actually block countries from progressing on same topics or worse, stimulate unnecessary duplication and competition.
- Too narrow scope of expertise - too often relying on same scientists...

4.2.2. Communication

1. The quality of EFSA communication is seen as strongly improving – often seen as excellent.
2. The upfront coordination of, for example, press releases with countries and the Commission is also seen as improving although there is still need for more practice on coordination and management 'to avoid man-made crises'. Especially the Commission is concerned that the very fact of communicating about a smaller risk will actually increase the perceived importance of that risk and create unnecessary 'man-made' commotion.
3. EFSA is sometimes perceived to be 'reaching out' for media attention and there is concern that there is too much focus on subjects that are 'sexy' for the media.
4. The website is much better than before : better look, better structure, but many don't seem to find their way into the work programmes/time tables...this is a key point that is brought up many times.
5. The timeliness of agendas etc. has much improved. Apparently this comment is referring to Board meetings, which are now felt to be running much smoother than in the beginning.
6. Web streaming is still described as a 'gruesome experience'.
7. Press conferences are seen as professionally organised and presented in an interesting and helpful way for the journalists

Statements that illustrate communication performance :

- If the science is good the communication will be good as well (country)
- Timing and quality of press releases is very good (country)
- Works very well – step-change (industry)
- Content is still difficult, we must avoid to create issues where there are none, we need more practical exercise for that - there are good signals that we are on the right track (Commission)
- Website is very good but there should be a second - internal site - with a chat room where we can discuss and optimize (country)
- Ideally EFSA should also translate country opinions (in 3 languages...), will bring us all closer - sort of 'what's new in Europe' (country)
- Risk communicators should also be competent in the scientific field (country)
- They are quite good, press releases are very clear, also spelled-out in non-scientific terms, that's good (press)
- They are strictly scientific opinions, should be orientated to consumer not just technicians (country)
- EFSA are good listeners, you don't have to say it twice. They are very willing to adapt and improve (country)
- Communication with local consumers is a local matter...good coordination is essential

5. Other performance items

This chapter briefly reflects on items that were much commented by the interviewees and that were felt to – positively or negatively - influence the performance of EFSA.

5.1. Risk Assessment vs Risk Management

Is it a good solution that EFSA is only focussing on risk assessment without intervening in risk management ?

- Most stakeholders and interested parties think this is the best solution on a European level.
- Some countries and also the Parliament think these belong together; the rationale being that risk is a continuum, and that this system works very well in the countries anyway.
- Everyone recognizes that there is a gray area between the two, which can sometimes be bridged by the 'management options' route, although it must be managed very carefully and the priority should be on the science. There are very strong mixed feelings about this item.

5.2. The relocation to Parma

There are mixed feelings about the move to Parma. Apart from the fact that the selection process for the location was extremely political and detrimental to the image of independence of EFSA, it was also seen as unacceptably slowing down the start-up of EFSA and causing a lot of irritation.

- There are not many positive factors relating to the move :
 - Parma is far away from 'Brussels' politics which helps EFSA's independence
 - 'It will promote video-conferencing, could be actually a good thing...'
- Most interviewees are negative or neutral at best :
 - It is not promoting the liaison with the Commission
 - It puts a very heavy burden on the scientists
 - It will be very inconvenient to build networks, cooperation...

The general feeling is that it is an unnecessary complication.

5.3. The impact of the new Member states

The expansion of the Union is not seen as dramatically increasing risk on food safety.

Yet it is recognized that it will significantly increase burden on EFSA in terms of coordination, education and liaison with these new countries, and hence there is concern of EFSA being snowed under in administrative work, already perceived as a key risk before.

5.4. Risk assessment separate from the Commission

- It is clearly seen as the best solution i.e. avoiding political influence – but more so as a signal than in reality.
- Many do not - not yet - see a difference in quality of opinions.
- Most agree (even in the Commission) that the communication has significantly improved and that there is a better sense for the need to co-ordinate efforts.
- Many agree that there is a serious risk of the Commission over-burdening EFSA, hence giving EFSA no time to look into other priorities or leaving sufficient time for self-tasking. So while theoretically EFSA is supposed to do all of that, in reality there is no change vs an in-house (Commission) institution.
- In the same context, some – countries in particular - have the impression that EFSA is also treating the Commission as prime target instead of European consumer.

6. The EFSA Vision Statement

Interviewees were asked to comment on the following – draft – vision statement for EFSA :

“Working closely with national authorities and stakeholders, the European Food Safety Authority is the keystone of the European food safety network. The Authority is committed to providing scientific advice of the highest possible quality and clear communication of existing and emerging risk.”

- Most stakeholders and interested parties considered it very positive for EFSA to have this kind of statement...and that it would take a while to get there...
- Perspectives were somewhat divided : apart from two respondents who thought the statement downright wrong, all others felt that this statement is going in the right direction but would need some adjustment. Most have been very constructive in their criticism and volunteered suggestions for improvement.
- Some of these criticisms are justified, as the vision in its current wording does reflect a certain ambiguity in EFSA's relation to the scope of its accountabilities (now + future) and towards stakeholders. The criticism stated most often, was the fact that EFSA is not so much the 'keystone of the food safety network' rather than of a 'risk assessment network'.

As already indicated at the outset, one of the key objectives of these interviews was to provide EFSA with perspectives and ideas on its image and performance, so the results will be used as input for finetuning the vision statement.

Some key statements about the EFSA draft vision statement :

Good statement :

- but could you get nutrition in ?
- but it is critical to balance off with what legislation says and the role of the countries should be looked at
- but it needs precision on the stakeholders...who are they ?
- but we are not a stakeholder, we are the Commission...
- but it is important to specify when to involve which stakeholders...
- but seems to confirm that EFSA gives more or at least as much importance to industry than to the public at large/the countries
- It would be more accurate to separate countries from other stakeholders
- ...but I hate the word stakeholder...it is Euro babble, ...what with independent and where is the consumer ?
- Full agreement, this is how it should be...but not what it is today
- I would start with what EFSA does - Keystone ?...No, one of the cornerstones perhaps ?
- Transparency is totally lacking, is that right ?
- EFSA is not keystone of the food safety network... of the 'risk assessment network' ?

As with all other items of these interviews the stakeholders and interested parties were very willing to contribute and one had the impression that they had all thought about the subject before and discussed it with their teams; the suggestions for improvement were numerous and reflected a genuine concern for EFSA to succeed in its mission.

So all in all, a great number of useful ideas with, again, quite a bit of contradiction, but there is certainly enough material to rewrite the statement in such a way that stakeholders and interested parties can adhere to.

Feedback by category

This section lists the key perspectives from the interviewed stakeholders and interested parties. Comments that would allow identification of the interviewee have not been included. This part has also been kept more succinct so as to avoid too much unnecessary repetition of points made earlier.

1. The Member states

This is the most diverse group and also the group with very different perspectives on EFSA's role and activities :

- Most agree with EFSA focus on risk assessment although it was stated that sometimes, this should expand to risk/benefit assessment (e.g. gmo).
- They all like the concept of a true European network with EFSA in a coordinating role. The big countries would support EFSA with resources (scientific and other), while the others could benefit from this network and, ultimately, leave all science-based risk assessment to EFSA. This approach would also eliminate costly duplication, avoid contradictory opinions and allow for more efficient handling of the workload. In that context, countries were quite irritated about the confidentiality of EFSA projects; they felt this is counter-productive, sometimes forcing them to launch parallel research and sometimes blocking access to the specialist scientists in a particular field.
- Most felt it was very difficult to read the priorities and work programmes of EFSA.
- Standardization of methods, procedures and selection criteria are seen as a key priority to achieve this goal; success will depend on team spirit and willingness to accept some form of compromise.
- They all agree that EFSA has brought the countries closer together and that the first steps towards effective cooperation have been taken; It was mentioned, however, that EFSA should take learning from other European networks (e.g. EMEA) and that there is no need to re-invent the wheel.
- The opinions on EFSA's current functioning vary widely with comments ranging from 'no difference with previous situation' to 'excellent work'. Yet all did see progress and seemed quite confident that it was more a matter of time rather than more fundamental issues.
- The quality of the opinions was seen as very good although there was surprise about the low number of opinions to date.
- Communication is seen as definitely better than before EFSA, but upfront co-ordination with the countries could still significantly improve. As with all other aspects of EFSA, in this group, the opinions varied from 'need to further improve' to 'excellent'. EFSA staff was seen as extremely competent and responsive to requests.
- The key message from the countries to EFSA is that they feel they are the only true partners of EFSA in the network and that they should be recognized as such. Several countries expressed concern about EFSA's 'closeness' to the Commission and to industry.

- The overall conclusion on the countries is that they are extremely motivated to support EFSA and most feel the Authority is definitely on the right track and that is still very early days to judge.

2. Consumer organisations

- Consumer organisations are quite positive about EFSA performance to date; they feel strong improvement vs the situation before: they now have a central European point of contact and they feel that EFSA has been very responsive to their needs.
- They clearly expressed the need for EFSA to be actively involved in nutrition; they applaud the recent decision to have EFSA look into allegations and would like to see this extended to nutrition profiles etc.
- Like most other stakeholders they explicitly mentioned the quality of the EFSA staff : 'One has a good feeling – One can smell the good atmosphere'

3. Industry

- Industry stated that, although it is still early, EFSA has already taken the authority that was expected from them. The main example for this was in the handling of the semicarbazide issue. In spite of a few minor problems their takeout was that EFSA clearly handled this much better than what they could have expected with the previous structures.
- As for the European consumer organizations, the fact of now having one central contact is very important for industry. They also hope that – to avoid unnecessary duplication and confusion – the countries will gradually move out of risk assessment. They would applaud initiatives from especially one of the bigger countries in that respect.
- A key improvement is communication which Industry considers a step-change. They recognize that EFSA will always have to co-exist with local communication but would encourage EFSA to take a more leading role in the communication process in the countries – again to avoid confusion and encourage consistency.
- There was also some disappointment that countries appear quite slow to act on positive EFSA assessments regarding issues such as gmo, where approval of substances is still very slow in spite of positive EFSA opinion.

4. Scientific panels

- There was recognition that the expert panels are not yet fully under steam, but that the basis is there.
- Key agenda point for science is to ensure that the grey area between risk assessment and risk management is covered; this should clearly be an EFSA accountability. It was felt that the risk managers should be explicitly aware of a number of options so as to avoid too much 'politics' in the management process.

- Again very explicit mentioning about quality and efficiency of EFSA staff.
- Science expressed the hope that EFSA should become a leading global player and could grow into the single European spokesperson regarding food safety risk
- Gmo was mentioned as one very complex issue and there was some concern that the isolation of the safety assessment from other debates (socio-economical, biodiversity...) was somewhat artificial and that the EFSA 'safe' stamp could potentially be abused for political purposes to legalize gmo.
- EFSA should probably have more scientists under permanent contract so that the panel tasks could be better prepared.

5. NGOs

- NGOs have high expectations about EFSA and are particularly pleased with its independent status. However, they are disappointed with the way EFSA handled certain projects, especially in field of gmos, where apparently new evidence from US studies had not been taken into account, and where EFSA had contented themselves with using existing – older – data from the Commission.
- Another aspect was semicarbazide, where EFSA clearly stated that indeed there was a risk...and now, 6 months later, nothing seems to have happened, so what is the point ?
- EFSA communication was seen as much better than before.
- Overall, NGOs felt the jury on EFSA is still out.

6. The European Parliament

- Again, early days for a definite opinion.
- The work so far of EFSA was seen as very encouraging : the quality of the opinion was described as 'impressive' and communication was seen as extremely good.
- The Parliament also stated difficulties in getting a clear view on EFSA's priorities and work programmes.
- There was serious concern about the interpretation of EFSA's responsibilities , i.e. too much workload for administrative support of the Commission, product approvals for industry, involvement in marketing claims etc. instead of focussing on the core reasons why EFSA was established, i.e. avoid the sort of food scares such as BSE, dioxins, and the likes. The Parliament feared that because of the administrative over-burdening, EFSA might not be able to have the right focus to avoid repetition of said crises. It was suggested that EFSA would for example twice a year report on its activities to the Parliament and – if need be – that the mission be revised to ensure focus on the right agenda.

7. The European Commission

- As with the countries, there were quite different opinions and expectations re. EFSA, ranging from extremely positive to concern, and sometimes frustration.
- It was recognised that the slow start-up created significant backlog, and although EFSA as such cannot be really blamed for that, the expectations and needs of the Commission are numerous and urgent. Again the number of opinions produced by EFSA is seen as very low, insufficient.
- The quality of the EFSA opinions was described by one Commission interviewee as 'state-of-the-art', but at the same time there was growing concern about slipping timetables.
- The Commission expressed extreme concern about the fact that, despite of this time pressure on their projects, EFSA still seems to find time to initiate self-tasking.
- In certain areas, the Commission is quite pleased with EFSA' opinions but would already like the Authority to go the the next level, i.e. adopt more of an value adding stance and start to prepare recommended positive substance lists, investigate cocktail effects of certain substances, and produce reference libraries.
- In terms of communication the Commission considers EFSA is on the right track. However, it does have the impression that EFSA likes to focus and communicate on 'sexy' topics (not specified...) , that do not have much impact on food safety at all but is interesting for the press, while much of the hard day-to-day ongoing basic substance and nutrition assessment seems to get less focus.
- In that context, the Commission is also concerned that EFSA's closeness to the Press would actually trigger scares rather than avoid them (semicarbazide was mentioned in this context).
- Overall, for the Commission, the jury is still out, but there is a feeling that there is strong progress

8. The Press

Of all interviewed parties the Press was actually the most positive. Their perspective was that, since EFSA's arrival, there is indeed communication about food safety in a coordinated and systematic way. The press has the feeling that EFSA is sincerely independent and open, much more so than was the case with the Commission before. They state the press releases are of very high quality and that press conferences are organised very professionally. They feel that EFSA has definitely restored confidence in the way Europe is handling food safety.

Overall conclusion

There is a strong feeling that EFSA is on the right track...but not quite there yet.

The most important positives are :

- EFSA delivers very high quality opinions ('state-of-the-art').
- EFSA is communicating significantly better than previous structures.
- EFSA has brought the Member states closer to one another and laid the foundation for more effective cooperation and communication.

The key areas to address are :

- EFSA must create clarity re. work programmes, priorities...and get the stakeholders to agree on these.
- EFSA must address the issue re. perceived low output and respect timings; the former seems to be more a matter of time (the number of opinions is growing fast) but the second one merits strong focus or, as some suggested, a re-assessment as to whether these timetables are realistic.
- EFSA ought to better leverage the network of the Member states; all countries have very strongly vowed their support and willingness to very actively support EFSA, to align their organisations etc. There is confusion and some frustration that there is not yet an effective working model. In this context the example of the work model of the EMEA was stated as a potential 'best practice'.

The slow start-up created substantial negative momentum but now everyone is seeing progress, although too slow for many. On the other hand everyone recognised that EFSA has a strong team in place, that there is a willingness and strong commitment to improve and while there was much criticism, it was almost invariably formulated in a very constructive way.

Hence we can conclude that nothing should prevent EFSA from delivering an outstanding contribution for ensuring better food safety in Europe and, ultimately, restoring consumer confidence.