Triennial Review of the Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment (COM)

Call for Evidence

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| **Title:** Triennial Review of the Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment (COM) – Call for Evidence |
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| Target audience: Individuals, government departments, government bodies, scientific communities, health and safety communities, and other health institutions with an interest in COM.  |
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Overview

In recent years the health and social care system in England has undergone substantial change. The Health and Social Care Act 2012 and the Care Act 2014 have devolved functions and powers away from the Department of Health to local and Arm’s Length Bodies.

The Department holds the key stewardship and assurance function in order to ensure that the new system and its numerous reformed bodies are performing appropriate functions to a high standard.

To perform this stewardship function the Department is undertaking Triennial Reviews of all of its Arm’s Length Bodies. This includes all Executive Non-Departmental Public Bodies (ENDPBs), Advisory Non-Departmental Public Bodies (ANDPBs), Executive Agencies and Special Health Authorities. The Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment (COM) is an ANDPB and is subject to review in 2015-16.

The programme of reviews uses the approach developed by the Cabinet Office as part of their work on public bodies reform.

Purpose of the review

As noted above, this review is part of a wider programme the Department of Health has developed as part of its stewardship and assurance function. The review will have two main stages:

* The first stage provides a robust challenge of the continuing need for COM both in terms of the functions it performs and the way in which these are delivered;
* If it is agreed that COM should retain its current function and delivery model, the second stage of the review will then consider its performance, governance arrangements and opportunities for efficiencies.

This Call for Evidence seeks views from respondents to assist the review’s consideration of both of the above stages. The evidence is being gathered simultaneously for stage one and stage two in the interests of timeliness and value for money only, and is not an expression of pre-judgement as to the outcome of stage one.

About the Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment

The Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment (COM) provides independent advice to UK government departments and agencies on the mutagenic risks to humans of specific chemicals (the risk that these chemicals might cause mutations or damage to genetic material). COM also advises on important general principles and new scientific discoveries associated with the assessment of mutagenic risk, and makes recommendations on mutagenicity testing. COM’s full terms of reference can be found on its website[[1]](#footnote-2).

COM consists of a panel of independent doctors and scientists with relevant expertise from universities, research institutes and, in some cases, industry. Members are supported by a joint secretariat provided by Public Health England and the Food Standards Agency. The secretariat provides members with comprehensive background information and briefing papers upon which rational decisions can be made.

COM is a non-statutory body established in its present form in 1978. It is an Advisory Non-Departmental Public Body (ANDPB) sponsored by the Department of Health (DH) with no regulatory role or executive powers. However it may provide advice to any government body where relevant including DH, the Food Standards Agency (FSA) and the Department for Environment, Food and Rural Affairs (DEFRA).

Closely associated with COM are two further advisory committees: The Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment (COC) and The Committee on Toxicity of Chemicals in Food, Consumer Products, and the Environment (COT).

COT’s Triennial Review will be undertaken by the FSA - their sponsoring body. In the interests of efficiency both COM and COT Triennial Reviews will be run simultaneously and align processes where appropriate (such as stakeholder engagement). COC is an internal DH expert advisory committee and is therefore not subject to the Triennial Review process. However it is likely that COC will feature in both reviews where appropriate, such as when looking at interactions between the three committees.

Useful links

[COM Website](https://www.gov.uk/government/organisations/committee-on-mutagenicity-of-chemicals-in-food-consumer-products-and-the-environment)

[COT Website](http://cot.food.gov.uk/)

[COC Website](https://www.gov.uk/government/groups/committee-on-carcinogenicity-of-chemicals-in-food-consumer-products-and-the-environment-coc)

[Cabinet Office Triennial Review guidance](https://www.gov.uk/government/publications/triennial-reviews-guidance-and-schedule)

Responding to the Call for Evidence

In order to conduct the review in a transparent manner and ensure findings are rigorous and evidence-based, the review team is seeking the views of a wide range of stakeholders. We are interested in the views of individuals and organisations that engage with COM or have a wider interest in its operations.

**The call for evidence is running from 6 July 2015 to 14 August 2015**. Responses can be provided by:

1. Completing the online questionnaire at <http://consultations.dh.gov.uk/triennial-reviews/committee-of-mutagenicity-of-chemicals-in-food-cus/>;
2. Completing Annex A of this document and emailing to TR-COM@dh.gsi.gov.uk; (This can also be posted to: COM Triennial Review Team, Room 220, Department of Health, Richmond House, 79 Whitehall, London SW1A 2NS).

Where option ii is used, the review team will accept responses or material in different forms provided it is relevant to the purpose of the review (detailed above) and/or the questions detailed below. The review team is unable to respond to individual cases or consider complaints other than as part of the evidence for the review where it falls within the terms of reference.

Workshop

Interested stakeholders are also invited to attend a workshop 14:00 – 16:00 on 5 August 2015 to share their views. This workshop will consider both COM and COT and will be run in cooperation with the FSA. The workshop will be held at Richmond House, London, SW1A 2NS. You can book a place (places are limited and allocated on a first-come first-served basis) through this link: <https://eventbrite.co.uk/event/17306256479/>

Annex A - Call for Evidence Form

**Confidentiality**

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FoIA) and the Data Protection Act 1998 (DPA).

If you want the information that you provide to be treated as confidential please be aware that under the FoIA there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain why you regard the information you are providing as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

**About You**

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| **Name:**       |
| **Organisation:**       |
| **Email/postal address:**       |

Would you categorise your response as from:

* Individual
* Public sector organisation
* Charitable/voluntary sector healthcare organisation
* Private sector
* None of the above.

Please state:

If your response is from an umbrella organisation representing a wider membership, please indicate the approximate number of members consulted and the number of responses received:

Please indicate what relationship you have with COM, if applicable:

**Questions**

There is no need to answer all nine questions unless you wish to do so. For those which you do answer please provide evidence to support your answers wherever possible. If you wish to send supporting documentation please email as an attachment to TR-COM@dh.gsi.gov.uk.

Information where relevance is not demonstrable will not be accepted as evidence. The review team is unable to respond to individual cases or consider complaints other than as part of the evidence for the review where it falls within the terms of reference.

**Function**

The Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment (COM) performs a number of functions:

* Provides independent advice to government on the possible mutagenicity and genotoxicity (the potential to cause mutations or genetic damage) of specific chemicals;
* Provides advice on the inherent properties of these chemicals and the level of risk associated with their exposure;
* Advises on important general principles or new scientific discoveries in connection with mutagenic risks,
* Co-ordinates with other bodies concerned with the assessment of mutagenic risks;
* Provides advice and methodology recommendations for genotoxicity testing;
* Undertakes horizon scanning work to analyse future health threats from potentially mutagenic chemicals.

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| **Question 1:** Is there a continuing need for the functions undertaken by COM? |
| Yes/No/Don’t know *[please delete as appropriate]* |
| Please give reasons for your answer:     * + What would be the implications of stopping the functions?
	+ Is providing the functions a justifiable use of public money?
	+ Are there any functions that could be stopped or undertaken differently?
 |

**Form**

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| **Question 2:** COM is currently an Advisory Non-Departmental Public Body (ANDPB) of the Department of Health. Do you think an alternative organisational structure would improve or be detrimental to delivery of any necessary functions? Which of the following organisational forms would you support: |
| * **Become an advisory expert committee of the Department**: could a function be more efficiently delivered if COM moved into the Department of Health as an expert advisory committee? COC currently has this status – if you have also interacted with COC has their status affected your perception/interaction with the committee?
* **Merge with COC and/or COT**: could a function be better delivered by COM if it were merged with COC and/or COT? In this scenario, should the merged body be in the form of an ANDPB or as an expert advisory committee?
* **Continued delivery as an ANDPB**: do its activities need to be seen to be delivered with absolute political impartiality? Does COM need to act independently of Ministers to establish facts and/or figures with integrity?
* Other**:**
* Don’t know

*[please delete as appropriate]* |
| Please give reasons for your answer:      |

**Performance**

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| **Question 3:** How well is COM currently performing and delivering its functions? |
| * Very well
* Well
* Average
* Poorly
* Very poorly

*[please delete as appropriate]* |
| Please give reasons for your answer:      |

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| **Question 4:** How well do you think COM, COC and COT interact with each other? |
| * Very well
* Well
* Average
* Poorly
* Very poorly

*[please delete as appropriate]* |
| Please give reasons for your answer:      |

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| **Question 5:** Are there other organisations either nationally or internationally which could be used to benchmark COM’s performance and outputs? |
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| **Question 6:** Is COM’s advice valued, respected and influential both nationally and internationally?  |
| Yes/No/Don’t know *[please delete as appropriate]* |
| Please give reasons for your answer:      |

**Efficiency**

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| **Question 7:** Do you think COM’s expertise is utilised effectively? Do you feel that appropriate work is given priority when resources are limited? |
| Yes/No/Don’t know *[please delete as appropriate]* |
| Please give reasons for your answer:      |

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| **Question 8:** How well do you think that COM interacts with organisations both within and outside of government? |
| * Very well
* Well
* Average
* Poorly
* Very poorly

*[please delete as appropriate]* |
| Please give reasons for your answer:     * + Should COM be working more closely with other organisations?
	+ Are potential users of COM’s services aware of its existence and responsibilities?
 |

**Governance**

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| **Question 9:** Do you think COM operates in an open, transparent, accountable and responsive way?  |
| Yes/No/Don’t know *[please delete as appropriate]* |
| Please give reasons for your answer:      |

If there is other evidence on COM’s role, functions, performance, efficiency or governance that you would like to submit as part of this Call for Evidence please attach it and state what it relates to.

**Please return completed forms by:**

**Email to: TR-COM@dh.gsi.gov.uk**

**Or**

**Post to: Department of Health, Richmond House, 79 Whitehall, Room 220, London**

**SW1A 2NS**

\*\*\* END \*\*\*

1. <https://www.gov.uk/government/organisations/committee-on-mutagenicity-of-chemicals-in-food-consumer-products-and-the-environment/about/terms-of-reference> [↑](#footnote-ref-2)