Food Risk Communication in the EU and Member States effectiveness, transparency and safety.pdf

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Food Risk Communication in the EU and Member States: effectiveness, transparency and safety

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I. Introduction

One of the most innovative and important elements introduced in the Food Law of the EU by Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and
laying down procedures in matters of food safety\(^1\), was the inclusion of risk analysis among the “General Principles of Food Law”. It is true that, apparently at least, no hierarchy was established for said principles; however, as indicated by the literature\(^2\), the principle of risk analysis — the first mentioned in article five of said Regulation — has and will have a fundamental role in the area of food legislation.

Risk analysis, as a process or method made up of three interrelated component parts (risk assessment, risk management and risk communication\(^3\)) must be understood as a mechanism by which the community legislator proposes to maintain a balance between, on the one hand, the requirement of guaranteeing a high level of supervision of health and consumers, and on the other hand, guaranteeing free circulation of goods. In the introductory recitals of Regulation no. 178/2002, said objectives are clearly outlined:

- (16) “Measures adopted by the Member States and the Community governing food and feed should generally be based on risk analysis\(^4\) except where this is not appropriate to the circumstances or the nature of the measure. Recourse to a risk analysis prior to the adoption of such measures should facilitate the avoidance of unjustified barriers to the free movement of foodstuffs.”

- (17) Where food law is aimed at the reduction, elimination or avoidance of a risk to health, the three interconnected components of risk analysis - risk assessment, risk management, and risk communication - provide a systematic methodology for the determination of effective, proportionate and targeted measures or other actions to protect health\(^5\).”

According to article 6.1 of said Regulation no. 178/2002, “in order to achieve the general objective of a high level of protection of human health and life, food law shall be based on risk analysis except where this is not appropriate to the circumstances or the nature of the measure”. Regarding the relevant definitions to frame the concept of risk analysis, in said Regulation we find the following:

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\(^3\) Article 3.10 of Regulation no. 178/2002.

\(^4\) Emphasis added by the authors.

\(^5\) Idem.
• «risk means a function of the probability of an adverse health effect and the severity of that effect, consequential to a hazard» (article 3.9); and

• «hazard means a biological, chemical or physical agent in, or condition of, food or feed with the potential to cause an adverse health effect » (article 3.14);

In Regulation no. 178/2002 there is no specific mention as to the risks that are object of the *system of analysis in question*\(^6\); in any event, the community case-law does allow affirming that the risk can be only potential — without affirming that the damage be actual or that it can be verified in the future—, but not only hypothetical: that is to say it cannot be void of any scientific-technical basis. Definitely, the introduction of the principal of risk analysis constitutes a limit to the discretional faculty enjoyed by the legislator, given that all measures adopted in terms of food safety must have an adequate\(^7\) «scientific basis».

In this context, after briefly referring to risk assessment and risk management, we feel it is appropriate to dedicate this study to risk communication so that one can identify the elements that form part of it, the factors that condition it, and the methods to practice it; in order to finalize my presentation we will also analyse the contents of a recent document published by EFSA: "Best practice for crisis communicators - How to communicate during food or feed safety incidents"\(^8\) (hereafter “EFSA document on risk communication”).

**II. Risk assessment and risk management**

As has been said, risk analysis is composed of three phases: risk assessment, risk management and risk communication.

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\(^7\) In this respect see the following recitals of Regulation no. 178/2002: 9 («it is necessary to ensure that consumers, other stakeholders and trading partners have confidence in the decision-making processes underpinning food law, its scientific basis and the structures and independence of the institutions protecting health and other interests»), 18 («in order for there to be confidence in the scientific basis for food law, risk assessments should be undertaken in an independent, objective and transparent manner, on the basis of the available scientific information and data»), 19 («...in some cases, provide all the information on which a risk management decision should be based, and that other factors relevant to the matter under consideration should legitimately be taken into account including societal, economic, traditional, ethical and environmental factors and the feasibility of controls») and 32 («the scientific and technical basis of Community legislation relating to the safety of food and feed should contribute to the achievement of a high level of health protection within the Community...»).

In effect, article 3.11 of Regulation no. 178/2002 establishes that risk assessment is «... a scientifically based process consisting of four steps: hazard identification, hazard characterisation, exposure assessment and risk characterisation»; it is thus a set of activities of a scientific nature aimed at specifying and characterising risks to health that can be derived from eating certain foods (and, as the case may be, feed) as a function of scientific data available at any given time\(^9\).

For its part, risk management «means the process, distinct from risk assessment\(^10\), of weighing policy alternatives in consultation with interested parties, considering risk assessment and other legitimate factors, and, if need be, selecting appropriate prevention and control options» (article 3.12 of Regulation no. 178/2002). Although said provision does not expressly provide it, the definition in question appears to refer to two phases of risk management: (i) the determination of the level of protection that society considers adequate considering the objective of guaranteeing a high level of protection for health, and (ii) the election of the most adequate measure to achieve such a level of protection. In this phase of risk analysis, it «shall take into account the results of risk assessment, and in particular, the opinions of the Authority referred to in

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\(^{10}\) Emphasis added by the author.
Article 22, other factors legitimate to the matter under consideration and the precautionary principle where the conditions laid down in Article 7(1) are relevant, in order to achieve the general objectives of food law established in Article 5 (article 3.6). That is to say that, whilst risk assessment requires having technical knowledge that must be guaranteed by subjects that are competent and experts in the field of scientific research, risk management consists in an activity assigned to the Commission in primis and, to a certain extent to Member States (in both cases counting with decision making competencies), said activity must firstly serve to recognise the forms and methods that are most adequate for intervention in the face of possible risks to health, considering the results of the risk assessment. In this sense, the risk managers must take into account said resolutions of the European Food Safety Authority (EFSA) and other pertinent factors (economic consequences, social and ethical values, etc.), in addition to the precautionary principle, when there are suspicions or doubts on the harmfulness of a product for human health; in such a case the measures of risk management must meet the two fundamental general objectives of food legislation which we have referred to, i.e. protection for the health of consumers and free circulation of goods. As doctrine has underscored, these measures do, at least in theory, contradict each other.

III. Risk communication

1. Definition

The third and last component of risk analysis is risk communication. Fundamentally, it consists of an interactive exchange between the interested

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parties on information, opinions and indications on risk assessment and the decisions in terms of risk management. In fact, article 3.13 of said Regulation no. 178/2002 precisely defines it as «the interactive exchange\(^{14}\) of information and opinions throughout the risk analysis process as regards hazards and risks, risk-related factors and risk perceptions, among risk assessors, risk managers, consumers, feed and food businesses, the academic community and other interested parties, including the explanation of risk assessment findings and the basis of risk management decisions».

It is thus an activity that is developed throughout the entire process of risk analysis, and in the food sector risk communication falls upon both EFSA, in its capacity as organisation responsible for risk assessments, and the Commission, which is responsible for communicating measures adopted as a function of risk management. We must also mention the significant role played by Member States: thus, for example, in many cases it is the final users of the specific obligations of information and communication of risk, as is the case with the Rapid Alert System for Food and Feed (RASFF)\(^{15}\).

2. Transparency and quality of communications

The literature has highlighted the need to apply open and transparent communications with consumers on food safety policy, and how decisions are made on this matter\(^{16}\); consequently, it is ever more important to establish the best way to communicate with the public on how food risks are managed. Many

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\(^{14}\) Emphasis added by the authors.


\(^{16}\) See for example: MILLSTONE, E. and VAN ZWANENBERG, P., "A crisis of trust: for science, scientists or for institutions?", No. 6, [Nature Medicine](http://www.nature.com/nm), 2000, pp. 1307-1308.
scholars have underscored the importance of efficient communications on food risks so that consumers can make adequate decisions as well as gauge their attitude and behaviour related to health. In any event, given that a large part of research has been centred to date on communicating risks associated with certain dangers, studies and analysis on how to effect this communication are not limited to a few, but rarely provide a broad vision on communication as such. For example, in crisis situations communications regarding what risk managers are doing to protect consumers is extremely important so that the population may react adequately as regards existing food risks, and those that are emerging (the quality of the communication in question will allow generating trust between the consumers in the process and practice of risk analysis). Effectively, the result of increasing transparency in the process of risk analysis and on practices of risk management will be that the decisions made will become public knowledge. Analysing closely, and with certain perspective the past food crisis (PCB/dioxin, “mad cows”, etc.), we will be able to identify under what circumstances the public may want to know why and how institutional activities centred around consumer protection are conducted. In this respect the application of legislation whose objective is safety, and all efforts directed towards prevention, have demonstrated an interest to achieve perception by the consumer regarding an efficient management of food risk. From all of this one can imply that an efficient communication of risk should not only include information on risks associated to different food dangers, but also on what risk managers are doing to mitigate it.


21 Idem.


25 See: CHRYSSOCHOIDIS, G. et al., op. cit., pp. 139-142.
Other important factors that can influence a *good or bad understanding* by consumers of the communication of risk are the scientific uncertainty and the variability of risks associated with the risks and procedures of risk evaluation. Both concepts are to be incorporated in the decisions and practices of risk management. Evidently not only is scientific uncertainty but also risk variability are inherent in the corresponding evaluation, but it is possible that they have not been explicitly communicated to the public opinion. Getting risk analysis to be transparent requires it to be exposed and explained publicly both in terms of the uncertainty as the level of vulnerability of the population to the risks in question: consequently, it is very necessary to also examine in which way uncertainty and variability should be communicated to the public, and how said communication could satisfy more efficiently the *demands* of society — and, in particular, that of vulnerable groups.

For this reason, the main objective of this study is to examine the impact of the information on food risks and the practices of risk management in the perception of the consumer on the quality of food risk management: said objective implies attempting to compare the effects of communicating on various factors to relate them with the perception of the quality of food risk management of the consumer, i.e.:

- the information on the application of legislation;
- the information related to the actions of competent authorities whose goal is prevention;
- the communication of scientific *uncertainty*, and
- the communication of the *variability* of the risk.

*Brevitatis causae*, we cannot here outline the result of the research on the differences and potential similarities in the preferences of the consumer in relation to the various strategies of risk management in a broad manner of dangers and countries; it is a *pending assignment* that can provide useful knowledge regarding whether one must propose and adopt general or specific directives for the communication on management of food risks.

### 3. Application of the legislation

If we are guided by what is affirmed in the document of the Joint FAO/WHO Expert Consultation, entitled precisely “Risk management and food safety”:

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«The primary goal of the management of risks associated with food is to protect public health by controlling such risks as effectively as possible through the selection and implementation of appropriate measures». Said report enumerates among others, the following “General Principles of Food Safety Risk Management”:

- « Protection of human health should be the primary consideration in risk management decisions.

Decisions on acceptable levels of risk should be determined primarily by human health considerations, and arbitrary or unjustified differences in the risk levels should be avoided. Consideration of other factors (e.g. economic costs, benefits, technical feasibility, and societal preferences) may be appropriate in some risk management contexts, particularly in the determination of measures to be taken. These considerations should not be arbitrary and should be made explicit30».

- «Risk management decisions and practices should be transparent.

Risk management should include the identification and systematic documentation of all elements of the risk management process including decision-making, so that the rationale is transparent to all interested parties31».

- «Determination of risk assessment policy should be included as a specific component of risk management.

Risk assessment policy sets the guidelines for value judgements and policy choices which may need to be applied at specific decision points in the risk assessment process, and preferably should be determined in advance of risk assessment, in collaboration with risk assessors32».

- «Risk management should ensure the scientific integrity of the risk assessment process by maintaining the functional separation of risk management and risk assessment33».

Functional separation of risk management and risk assessment serves to ensure the scientific integrity of the risk assessment process and reduce any conflict of interest between risk assessment and risk management. However, it is recognised that risk analysis is an iterative process, and interactions between risk managers and risk assessors are essential for practical application. »

30 Emphasis added by the authors.

31 Idem.

32 Idem.

33 Idem.
- « Risk management decisions should take into account the uncertainty in the output of the risk assessment. 

The risk estimate should, wherever possible, include a numerical expression of uncertainty, and this must be conveyed to risk managers in a readily understandable form so that the full implications of the range of uncertainty can be included in decision-making. For example, if the risk estimate is highly uncertain the risk management decision might be more conservative. »

- « Risk management should include clear, interactive communication with consumers and other interested parties in all aspects of the process. 

On-going reciprocal communication among all interested parties is an integral part of the risk management process. Risk communication is more than the dissemination of information, and a major function is the process by which information and opinion essential to effective risk management is incorporated into the decision. »

- « Risk management should be a continuing process that takes into account all newly generated data in the evaluation and review of risk management decisions. 

Subsequent to the application of a risk management decision, periodic evaluation of the decision should be made to determine its effectiveness in meeting food safety objectives. Monitoring and other activities will likely be necessary to carry out the review effectively. »

The fact that the main objective of food risk management is the protection of public health (by means of risk control in the most efficient way possible through the selection and application of adequate measures) implies that it is also important for consumers; in effect, the perception of efficient food risk management is a fundamental objective of said management. If the responsible authorities systematically provide information on the measures adopted to control food risks, this facilitates good perception of the control (which in turn can reduce the negative perception of risk). 

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34 Idem.

35 Idem.

36 Idem.

As a “good” example of information easily accessible for consumers on food inspections and controls, we can refer to the “Smiley - Food inspection” system, very much appreciated in Denmark because, in a very explicit and simple manner, the results of inspections are illustrated with adhesive stickers of smileys with different facial expressions.

4. Preventive risk management activities by competent authorities

It is well known that it is “best to be safe than sorry”; therefore, we will also be interested in the impact of information concerning the preventive activities of risk management by the authorities in question. Firstly, it is true that the strict application of laws and safety standards could be perceived as a preventive activity of risk management (for example, when there are frequent inspections on food safety). Some scholars are of the opinion that citizens prefer that the competent authorities on matters of consumer protection direct their efforts to prevention of an incident of food safety as opposed to managing risks by adopting a reactive approach, a posteriori, and consider that this is indicative of good management. In any event, risk prevention is not always easy to «… practice successfully».

In some cases, communication to the public of the scientific uncertainty can also be considered preventive. The notion of scientific uncertainty refers to the degree to which the probability of something potentially dangerous happening can take place, and it is identified better each time as techniques are adopted regarding risk assessment probabilities in this area. Although it can be considered that facilitating information on the scientific uncertainty to the general public will increase mistrust in scientific institutions and cause panic and confusion regarding the extent and impact of a given danger, if consumers are consulted, it appears that they prefer to be aware of information on the uncertainties that exist in an understandable manner in order to make an informed decision on the

38 See the following page on internet consulted on 8.4.2016: http://en.mfvm.dk/focus-on/smiley-food-inspection/.


42 See: ENROSA, M. G., op. cit., pp. 16-17.


different food dangers and be *right* in the election of food they wish to acquire and consume.

Leaving aside the discussion on if communication of uncertainty on risk assessment can be considered a “measure of prevention”, many authors have highlighted that it serves to consolidate trust of citizens in the competent authorities\(^{45}\) (and mention is frequently made of the *crisis of the mad cow disease*, and the ensuing loss of trust of consumers as something that must not repeat itself\(^{46}\)). In any event, we will insist in remembering that it has been affirmed that in some cases the information on the uncertainty of risk can increase/worsen the quality of food risk management\(^{47}\).

### 5. Communication of the *variability* of risk and its perception

The communication of risk variability is another subject that is worth dealing with. In this study we use the term risk *variability* referring to the differences known in the population concerning the vulnerability of certain groups of people. As we have said, communication to the public of information on said variability should facilitate informed decision making regarding issues of food safety\(^{48}\); in principle it appears that communications that *transmit* information that is *individualized* will be more effective that if they were general\(^{49}\), and, in addition, a risk for all the population *can* be less than the risk for certain subgroups\(^{50}\). In this respect it is logical to conclude that the lack of communication of risk variability can cause confusion\(^{51}\).

In certain cases, variability is detected in the reaction of consumers after a given communication on risk management; it is well known that different types of risk

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\(^{50}\) See opposite opinión of SESARRA, A. T. (*en op. cit.*), pp. 11-12.

are related to perceptions that are qualitatively different to dangers\(^{52}\) (depending in addition on different factors\(^{53}\)): thus, for example, it is obvious that consumers evaluate risks they perceive as natural\(^{54}\) as less perverse or threatening than those of a technical nature (which often is not fitting to reality\(^{55}\)). In any event, the doubts of consumers are the result of lack of trust in food technology and there is increasingly greater rejection of diets high in fats, worries about increase in weight and for all foodstuffs that may lead to an increase in heart illnesses. Obviously OGMs tend to relate to its effects on health as for example, unknown consequences in the long term; notwithstanding they are often rejected due to ecological reasons\(^{56}\).

IV. The EFSA document on communication of the risk

1. Basic concepts

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\(^{54}\) SESARRA, A. T. criticises the use of this expression, see also: \textit{op. cit.}, pp. 11-12).

\(^{55}\) See: ENROSA, M. G., \textit{op. cit.}, pp. 16-17.

\(^{56}\) AND “anti-system” if we go by what SESARRA, A. T affirms (See. By said author: \textit{op. cit.}, pp. 11-12).
As we have already said, the European Food Safety Authority (with headquarters in Parma) at the beginning of this year published the “EFSA document on risk communication”\(^57\).

It is worth highlighting that said document contains recommendations aimed at those responsible for communicating (directly or indirectly) with the public during an incident or crisis related to food or the distribution of food: «they are directed at organisations of member States of the EU that must guarantee safety of food and feeding, but can also be useful as a reference for other organisations involved.»\(^58\).

Paragraph 1.2 defines what is an incident or crisis related to food destined for human beings or animals:

«To the effects of this document we use the term incident such as defined by EFSA […]: An incident related to food safety of products destined to human beings or animals at the European level that must be dealt with urgently if one or more of the following identifiers are present:

- The risk of public health is high (serious illness or death).
- The scope of the incident is great or likely to be so (if the number of products, countries or persons affected is high).
- The incident has occurred or it is believed has occurred as a result of a terrorist act.
- Real or potential high level of interest by the media or object of public fear.


\(^{58}\) See paragraph 1.1 of the EFSA document on risk communication.
- The vulnerable groups of the population, for example, children or the elderly are likely to be disproportionately affected.

- The origin of the problem is unknown.

To summarise, it is a list that includes both objective as subjective criterion; probably because of this EFSA immediately refers to the following critical factors outlined in paragraph 2.1 of the Annex of the: Commission Decision 2004/478/EC of 29 April 2004:

«[that] the situation involves a serious direct or indirect risk to human health and/or is perceived or publicised as such or can be perceived and/or publicised as such and the risk is spread or could be spread by a large part of the food chain and it is highly likely that the risk will spread to several Member States and/or non-Community countries».

The recommendations object of this epigraph were formulated by the Advisory Forum Communications Working Group of EFSA (AFCWG) in order to achieve a coherent application of good practices during incidents related to its competencies: «are destined to deal with the need identified by the Heads of the European Food Safety Agencies, in order to have clear and practical recommendations to communicate with the public during an incident related to food or feed».

In this respect the recommendations in question capture current good practices to communicate with the public and media during an incident; and in addition will be of great help so that competent authorities «… integrate them in their own protocols and procedures of communications as applicable…».

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59 Decision concerning the adoption of a general plan for food/feed crisis management (OJ L 160 of 30.4.2004, p. 98). In art. 1 of said decision it states: «the general plan for food/feed crisis management, provided for in Article 55 of Regulation (EC) No 178/2002 and set out in the Annex, is hereby established».


61 See paragraph 1.3 of the EFSA document on risk communication.

62 Ibidem, paragraph 1.4.
the *document of EFSA on risk communication* there is a *fast guide*, that can be used as a reference list for communications during an incident or crisis situation:

<table>
<thead>
<tr>
<th>Actions During a live incident/crisis</th>
<th>Deadline</th>
<th>Responsibility</th>
<th>Share with EPSA/other MS</th>
<th>Done</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obtain all information (if appropriate to your role) and convene the incident communications team</td>
<td>01/01</td>
<td>Media Relations Officer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brief internal stakeholders and ensure senior management is informed of situation and communications actions</td>
<td>02/01</td>
<td>Head of Communications</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agree approval protocols and check availability of key people for sign-off</td>
<td>02/01</td>
<td>Head of Communications / Media Relations Officer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inform and liaise with key external stakeholders such as the Advisory Forum (AF)</td>
<td></td>
<td>EFSA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inform chair of AFCWG of the evolving issue in your country and what actions have been taken so far</td>
<td>03/01</td>
<td>Head of Communications (member of the AFCWG)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schedule and chair AFCWG conference calls; invite relevant MS and keep all other MS informed</td>
<td></td>
<td>EFSA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Participate in AWCWG conference calls if your country is (or has the potential to be) directly affected. Be prepared to give an update on the status in your country and media / social media coverage. Brief colleagues on conference call outcomes as appropriate</td>
<td>05/01</td>
<td>Head of Communications (member of the AFCWG)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Activity</td>
<td>Responsible Person</td>
<td>Date</td>
<td>Relevant Status</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------</td>
<td>---------</td>
<td>-----------------</td>
<td></td>
</tr>
<tr>
<td>Keep MS Advisory Forum member updated on communications</td>
<td>Head of Communications (member of the AEOWG)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prepare key messages. Share with other MS, if relevant</td>
<td>Media Relations Officer</td>
<td>06/01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Review media / social media monitoring with your service provider, Share social media monitoring reports, if relevant</td>
<td>Social Media Officer</td>
<td>07/01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Draft holding statement and share with EFSA and other MS as appropriate</td>
<td>Media Relations Officer</td>
<td>07/01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prepare Q&amp;A / FAQ and share with colleagues for corrections / new information to be added</td>
<td>Media Relations Officer</td>
<td>08/01</td>
<td></td>
<td></td>
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<tr>
<td>Translate MS materials if necessary and useful, and circulate as appropriate</td>
<td>EFSA</td>
<td></td>
<td></td>
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<tr>
<td>Consider what visuals might be useful to support your messages</td>
<td>Designer</td>
<td>08/01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nominate and brief media spokespersons – organise media training for spokespersons, if necessary</td>
<td>Media Relations Officer</td>
<td>09/01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Track all requests for information by setting up media enquiry and social media posts logs</td>
<td>Social Media Officer</td>
<td>07/01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deal with media enquiries in a professional and timely manner. Consider a press conference if inquiries become overwhelming in number</td>
<td>Media Relations Officer (from 01/01)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Review monitoring reports: frequently. Correct inaccurate information where possible. Review whether additional resources are needed to respond / monitor</td>
<td>Social Media Officer</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Identify key external stakeholders and channels to best reach them</td>
<td>Head of Communications</td>
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<tr>
<td>Consider the needs of hard-to-reach audiences</td>
<td>Head of Communications</td>
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</tr>
<tr>
<td>Identify third party friends for potential endorsement or to multiply your key messages and information</td>
<td>Head of Communications</td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
2. When and how will one call upon the actions and measures that are recommended?

In section 1.5 the _EFSA document on risk communication_ suggests following the recommendations in question:

- _Before an incident arises_: integrate them in the protocols for public information, and it advises they be taken into consideration during training exercises/mock crisis situations.

- _During an incident_: constitute a useful reference to determine the respective roles of EFSA and member States regarding communications during and _after_ an incident.

Especially interesting is paragraph 1.8 regarding the “Guiding principles to communicate during an incident”:

«- Take control of the communication on the situation – even if the facts are still uncertain.

- Communicate rapidly to protect human health.

- Identify with whom you need to communicate and how to find them. Be clear and transparent.

- Never underestimate the situation.

- Cooperate – remember that crisis do not stop at international frontiers. »

Flow of work in communications during an incident (four key elements):

<table>
<thead>
<tr>
<th>Collect information</th>
<th>Prepare</th>
<th>Communicate</th>
<th>Monitor and revise monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

Without any doubt one of the most important key elements (and which, in many cases must be materialised as soon as possible, is “Collect information”; in the
EFSA document on risk communication (paragraph 2.1) it recommends that when there is a suspicion that there is an incident the collection take place as soon as possible (exploring traditional channels, and social networks to know what is being notified, commented or shared) and the recommendation is to respond.

- take time to verify with certainty that the terms of the search of monitoring that takes place will adequately cover the situation;
- establish additional monitoring processes as required;
- have a registry of journalists questions and one for internet comments (in annexes III and IV of the EFSA document on risk communication models are included); and
- share important information with AFCWG.

Considering, in addition, that EFSA conducts daily monitoring of traditional media and social networks and can share the results with member States.

3. Objective: communicate properly and efficiently

According to EFSA, it is necessary to disseminate efficient messages; to do so, in item 2.2(a), it advises:

- limit key messages to a maximum of three or four;
- avoid topics and language reserved for the specialists (jargon);
- summarise to the essence all information/messages one wishes to transmit;
- ascertain that messages are adequate for whom they are specifically directed on information one wishes to communicate;
- not fear to say that the facts dealt with are as yet unknown; and
- don’t speculate or blame.

It is also advisable to avoid complex data; use simple and practical information («use analogies or day-to-day comparisons to help people understand large numbers or scientific terms»), etc.

We have no intention for this article to exceed reasonable limits and precisely because of this (and because the complete version of the EFSA document on risk communication in the English language is available on the internet) we will omit referring to other related paragraphs and sections, for example, the three fundamental questions media usually ask when an incident has taken place (What has happened? How did it happen? What will be the reaction of the
competent authorities?); cooperation with the interested parties and at the European level (EFSA, member States and the Commission); or the election/selection of which channels of communication to use and in particular use the social networks.\textsuperscript{63}

We do, in conclusion, advise readers to specially consult the recommendations of EFSA on communications when the facts have not yet been corroborated truthfully: because «communicate when the facts are still uncertain is one of the most difficult challenges in the first stages of an emerging incident [and] in this situation it is important to say what is known, recognise what is not known and indicate what is being done to obtain the corresponding information».\textsuperscript{64}

In general terms, Reading the \textit{EFSA document on risk communication} can be of use because, although it does not provide new information, it is interesting due to its set of recommendations / guidelines on managing the communications in question as well as having a good presentation of its contents.


\textsuperscript{64} See paragraph 2.2 of the \textit{EFSA document on risk communication}. 