Hazard perception and risk management – proposed dialogue with ACHS/UKCSF

At the last meeting of the Pesticides Forum, on 17th June, members discussed the proposed amendments to the Authorisation Marketing Regulation (recorded at 5 ii and iii of the minutes of that meeting). Two actions arose from the discussion, one being a letter from the Pesticides Forum to the European Health Commissioner, highlighting concerns about the lack of an agreed impact assessment for the proposals and ambiguity in the definition of terms relating to hazard and risk. The second action suggested that the Forum’s own understanding in this area might be enhanced by liaising with other groups with an interest in such definitions, specifically the UK Chemicals Stakeholder Forum and the Advisory Committee on Hazardous Substances.

Invitations have been extended to the Chair of the UK Chemicals Stakeholder Forum (CSF), Mr Christopher Hughes, and the Chair of the Advisory Committee on Hazardous Substances (ACHS), Professor Stephen Holgate, to attend a subsequent meeting of the Pesticides Forum to gain a better understanding of our role.

[Note: Defra’s website provides the following information about the relationship between CSF and ACHS: In April 2001, the ACHS adopted the principal role of advising the UK Chemicals Stakeholder Forum. In particular, the Committee has advised the Forum on its criteria for concern, in light of physical and chemical properties of substances. The Committee has retained its role of advising the government directly where appropriate.]

This paper sets out some suggestions as to how that dialogue and cooperation might be carried out. We would welcome comment, and additional suggestions from members, at the October meeting.

- An agreement to routinely update one another on activities, perhaps via summaries prepared and circulated by the relevant secretariats. Following the UK Pesticides Strategy model, this might take the form of a concise update after each meeting, with a more substantial document produced on an annual basis.

- A sub-group could be set up, composed of PSD/HSE/other chemical contacts and CSF representation to establish the basis on which knowledge about hazard, risk and the specific question of endocrine disruption can be shared. Dr Mike Roberts, of Defra’s International Chemicals and Nanotechnology Branch, is currently working on a paper on hazard and risk. He has agreed that the Forum might have sight of this when complete, at which point the potential in a meeting might be clearer. Similarly, the CSF/ACHS secretariat is currently obtaining more detail for us on the issue of risk vs. hazard in chemicals regulations as recently discussed by the Chemicals Regulatory Forum.

- The Pesticides Forum Secretariat’s preference is that we promote awareness of the CSF/ACHS/PF through the respective websites as a means of keeping in touch with current activities. This could include setting up reciprocal links between the websites. If the Pesticides Forum discusses anything of specific concern to CSF/ACHS we could agree to bring it to their attention directly.

Pesticides Forum Secretariat, October 2008