EUROPEAN REGULATION AND INNOVATION FORUM – POLICY NOTE 34

CONSUMER SAFETY, GOOD GOVERNANCE, AND SCIENTIFIC EXCELLENCE

March 2022

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EXECUTIVE SUMMARY

New initiatives proposed by the European Commission seek to restructure parts of the governance of the provision of scientific assessments for consumer safety. Possible changes include absorbing the responsibilities of existing independent scientific committees into other existing bodies and placing greater emphasis on the intrinsic properties of materials, rather than likelihood of harm, as the major regulatory philosophy for managing consumer safety. Such proposals provide an opportunity to reconsider the challenges facing the future governance and the effectiveness of the current independent scientific committees.

The European Regulation and Innovation Forum (ERIF) contributes ideas about the evolution of the EU's approach to ensuring consumer safety. This Policy Note is informed by the findings of previous work on scientific assessments and governance undertaken by ERIF, as well as by discussions that took place at a recent ERIF workshop on the matter.

Main Findings

Consumer safety depends upon assessments of the likelihood of harm carried out by relevant, eminent independent experts and based on an understanding of exposures derived from the best and most up-to-date scientific evidence. Science and expertise, regardless of provenance, protects citizens and ensures safe enjoyment of benefits.

The present EU-level governance of consumer safety is highly effective. It ensures that legislative objectives are delivered, protects consumers, facilitates safe enjoyment of benefits, and helps prevent regulatory failure. There is no evidence that the existing approach based on independent scientific committees is failing or needs to be restructured. It continues to deliver high quality harm mitigation measures that are trusted, effective, and predictable.

The existing model of independent scientific committees can be improved in two critical areas: access to expertise, and the use of advanced science in scientific assessments.

However, the greatest threat to the future effectiveness of consumer safety regulation in the EU comes from the risk posed by inappropriate reforms of governance of scientific assessments: specifically, proposals to base interventions on intrinsic properties and to absorb the functions of the independent scientific committees into other existing agencies.

Recommendations

The review being undertaken by the European Commission provides an opportunity to strengthen the use and governance of the independent scientific committees, and the high quality opinions they produce, through the **creation of new, dedicated agency** and by issuing **a formal statement of the regulatory principles that guide regulation of consumer safety**, including requiring interventions to be based on likelihood of harm.

The European Commission should also adopt **new policies for the selection of experts and for the use of evidence derived from New Approach Methodologies (NAMs)**, thereby strengthening the effectiveness of the existing independent committees.

European Regulation and Innovation Forum
March 2022

1. Background

When managing consumer safety the primary aim of governments is to ensure that products are safe for their intended use. This is best achieved when regulation of consumer safety is predictable and based on the likelihood of harm. In turn, this facilitates safe use of technologies, stimulates investment in new sustainable products, limits arbitrary implementation by governments, and allows consumers to enjoy valued functional and emotional benefits. It also contributes to consumer confidence and engenders public trust. These are core objectives of the EU's Better Regulation Agenda.

New initiatives proposed by the European Commission seek to restructure parts of the governance of the provision of scientific assessments for consumer safety. Possible changes include absorbing the responsibilities of existing independent scientific committees into other existing bodies and placing greater emphasis on the intrinsic properties of materials, rather than likelihood of harm, as the major regulatory philosophy for managing consumer safety.

Such proposals provide an opportunity to reconsider the challenges facing the future effectiveness of the current independent scientific committees and to examine ways of building on this highly successful approach.

The European Regulation and Innovation Forum (ERIF) contributes ideas about the evolution of the EU's approach to ensuring consumer safety. This Policy Note is informed by the findings of previous work on scientific assessments and governance undertaken by ERIF, as well as by discussions that took place at a recent ERIF workshop[1] on the matter.

2. Ensuring Consumer Safety in the European Union[2]

2.1. Regulation of Consumer Safety

Regulators face a number of challenges when developing measures to ensure consumer safety, but can take advantage of emerging governance and methodological opportunities to further enhance the quality of decisions. Specifically:

- **Distributional impacts and trade-offs** – it is difficult to legislate for the safety of entire populations. Interventions benefit some but not all, leading to the need for regulators to understand trade-offs. Only scientific assessments based on an understanding of exposures and the likelihood of harm can facilitate the process of making choices between sub-groups and potential harms.

- **Marginal improvements** – most societies in the OECD area are well-protected against potential harms posed by the production and use of consumer products. In this mature regulatory context, new interventions frequently seek to achieve very small, often marginal, improvements in safety, whilst potentially triggering behavioural changes including risk transfers and other forms of risk-risk outcomes that increase overall likelihood of harm.

[1] The European Regulation and Innovation Forum (ERIF) held a major on-line workshop in November 2021 focusing on *'Scientific Excellence in Consumer Safety'*. More than 100 invited guests, including distinguished scientists, senior officials from the EU institutions and Member States, experts from academia, think tanks, and the business community joined the event and participated in the wide-ranging discussions. The workshop programme is included as Appendix A.

[2] The ideas set out in this Policy Note are explored in more detail in ERIF Monograph 'Scientific Excellence in Consumer Safety – Insights for the EU Better Regulation Agenda' (2022).

- **Characteristics of scientific assessments** – proposed interventions to improve consumer safety are, on too many occasions, justified on the basis of low quality studies, old methodologies, or out-of-date knowledge about issues such as the causes of cancer. To protect consumers interventions should be justified on the basis of scientific assessments that focus on identifying likelihood of harm, based on the best available scientific evidence of exposures, and derived from processes undertaken by eminent and relevant experts with deep sectorial knowledge.

- **Expertise** – amongst regulators there is, in general, a lack of knowledge of technologies, applications, and usage of consumer products. Relevant knowledge is mostly held by producers of consumer products and the networks of academic scientists with which they engage, rather than more widely within academia. Regulators need to design governance policies that recognise this.

- **Management of Conflicts of Interest** – access to relevant and eminent expertise is a critical pre-condition for high quality scientific assessments, particularly when considering consumer safety. Conflict of Interest policies adopted by parts of the European Commission increasingly exclude from assessments scientists with links to industry. Such policies focus primarily on material conflicts, often distant and historic, rather than considering all potential conflicts, including values and political beliefs.

- **Evidence and New Approach Methodologies (NAMs)** – it is in the public interest to ensure that scientific assessments that support consumer safety decisions are based solely on the highest quality and most up-to-date evidence. To achieve this, scientific committees and regulators need to encourage greater use, without prejudice, of scientific evidence generated using New Approach Methodologies (NAMs)[3], as well as adopting formal principles and guidelines for scientific integrity.

- **Clarity of Regulatory Benefit** – clarity of benefit, specifically consumer safety, is essential if the EU is to continue to enjoy a high standard of protection. In contrast, the pursuit of multiple objectives, such as 'essentiality', dilutes the purpose of interventions, makes implementation difficult, triggers unpredictable trade-offs, increases administrative discretion, creates regulatory unpredictability, and undermines levels of consumer safety[4].

2.2. Governance and Scientific Assessments

Governance of scientific assessments plays a major role in ensuring that regulation of consumer safety is of high quality. It encompasses: (1) political and legal commitments; (2) institutional architecture (including powers, responsibilities and processes); (3) policies; and, (4) guidance. Governance can be strengthened in a number of ways, including:

- **Awareness of the function and nature of good governance** – acknowledgement by decision-makers of the relevance of the governance of scientific assessments is critical. Governance provides a political, legal, procedural, and structural framework within which decisions are made, including assessment of the likelihood of harm and the management of mitigation measures.

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[3] In place of the animal testing methods developed over 50 years ago, academics, supported by governments and the corporate sector, have developed new, human-focused ways of understanding mechanisms of toxicity. NAMs focus on the mechanisms that lead to end points, making use, for example, of major scientific advances in bio-medical science. In turn, these more precise and relevant tools are being used to better understand exposures and the likelihood of harm. NAMs enable protective measures to be better targeted, more accurate, and more effective.

[4] ERIF Highlights Note 16 *'Essentiality, Better Regulation and Management of Risk from Technologies'* (2021).

- **Recognition of the benefits of good governance** – properly designed governance informs the culture and behaviours of scientific assessors and regulators, contributing to the predictability, nature, and quality of decisions. It provides the context within which high quality decisions are made. Finally, good governance strengthens trust in the overall decision-making process, enhancing transparency, legitimacy, social acceptance, and consumer confidence.

- **Communication of dedicated regulatory principles** – the statement of regulatory principles for consumer safety is the most important part of the EU governance framework. Requirements include: (1) **primary social aim is to protect the consumer**; (2) **high quality scientific advice** is the justification for State action; (3) **independent experts** provide advice, using excellent, impartial, and transparent processes, and based on the **best available scientific evidence, regardless of provenance**; (4) **assessments are based on the likelihood of harm**, focusing on real world exposures, and meet the highest standards of excellence, impartiality, and transparency; (5) scientific assessments are undertaken by **formally organised groups of independent experts with deep relevant knowledge** of applications, usage, sectors, and technologies; and, (6) scientific assessment bodies are **institutionally independent** of regulators and EU Member States;

2.3. Independent Scientific Committees and Consumer Safety

At EU-level, a number of different structural models are used to provide scientific assessments. The most important are: (a) assessments by Member States overseen or endorsed by a Technical Working Group or Scientific Committee of experts drawn from Member States; and, (b) independent scientific committees[5].

Research undertaken by ERIF has examined the effectiveness of the EU's model of independent scientific committees, as well as highlighting strengths and potential threats:

- **Effective regulation of consumer safety** – at EU-level, the current regulatory framework for managing consumer safety, set out in well-designed legislation, implemented through scientific assessments provided by independent scientific committees and focused on the likelihood of harm, works well.

- **EU good practices for governance of scientific assessments** – the success of the EU's regulatory framework for consumer safety is the result, in part, of the high quality governance framework that has been established for the independent scientific committees, supported by DG SANTE, that undertake assessments of consumer safety. The EU's independent scientific committees, and supporting governance framework, are an example of a world-leading good practice.

- **High quality scientific assessments** – scientific assessments developed by the independent committees are almost always of the highest quality. This is due to a number of reasons. All actions of the committees are guided by the principle of excellence. Committees are independent. A further aspect of the concept of independence is the degree of flexibility enjoyed by the scientific committees. Processes used to select committee members, manage conflicts of interest and

[5] The different models used at EU-level to develop scientific assessments as a basis for risk management, along with the wider importance of scientific evidence for decision-making, are discussed in the ERIF Monograph *'Scientific Evidence and the Management of Risk'* (2016).

undertake assessments of evidence are also transparent ensuring that opinions are perceived to be impartial.

- **Scientific integrity and decision-making culture** – over time, members of committees have also developed a culture of decision-making that emphasises the importance of scientific excellence and deep sectorial knowledge, along with a focus on exposures revealed by consumer behaviour. Collectively, there is also a tendency to be curious about developing knowledge and to be led by science rather than procedure. This includes an increasing willingness to accept evidence generated through New Approach Methodologies (NAMs).

- **Threats to independent scientific committee model** – this is a model for the implementation of risk management laws that works well. There is no evidence of significant failure or inadequacy. However, the independent scientific committee model used by the European Commission faces a number of threats:

    - First, threats to the effective operation of the current model because of the progressive loss of expertise and difficulties in gaining access to the best available evidence; and,

    - Second, threats to the continued existence of the model because of proposals to reform governance by restructuring the provision of scientific assessments at EU-level and basing future regulatory interventions on intrinsic properties rather than likelihood of harm.

2.4. Independent Scientific Committees – Governance Threats and Opportunities

As part of the EU's Green Deal, proposals have been developed for restructuring the governance of scientific assessments. Ideas include (1) greater emphasis on using intrinsic properties, rather than likelihood of harm, to legitimate regulatory interventions, and (2) the absorption of the responsibilities of the independent scientific committees into other EU bodies organised on the basis of Technical Working Groups.

These ideas, if implemented, may pose serious threats to good governance of scientific assessments for consumer safety and to the protection of citizens. At the same time, however, a review of governance could provide an opportunity to strengthen, rather than weaken, the effectiveness of independent scientific committees.

2.4.1. Governance Threats

- **Weaknesses of Technical Working Groups** – if the proposals are implemented then the responsibilities of the independent scientific committees may be taken over by existing Technical Working Groups (TWGs), possibly within an existing EU agency. There are number of major problems with the effectiveness of the TWG model. These include: inadequate expertise; focus on compliance with procedure rather than science; pursuit of national political goals; lack of relevant and up-to-date scientific knowledge; and, inappropriate application of the Precautionary Principle[6].

    Moving the responsibilities of the independent committees would put at risk, unless carefully managed, a model for carrying out scientific assessments that

[6] European Risk Forum Monograph *'Risk management and the EU's Administrative State: Implementing Law through Science, Regulation, and Guidance'* (2019).

is highly successful. A culture focused on expertise, exposures, and mitigation of the likelihood of harm would be threatened, without any obvious compensating benefits for consumer safety. Advances in the adoption of the most up-to-date scientific evidence would also be placed at risk, weakening the protection of consumer safety.

- **Inadequacies of using intrinsic properties for consumer safety** – greater use of intrinsic properties as the principal regulatory philosophy for managing harms is frequently justified because it will, according to supporters, speed up decision-making and protect the public, leading, in turn, to the replacement of 'unsafe' materials with 'unsafe' ones. These arguments are controversial and are not robust[7].

  Intrinsic properties alone do not provide an appropriate basis for ensuring consumer protection and the safe enjoyment of benefits. Evidence of the properties of materials, without knowledge of the likelihood of harm when in use, is insufficient to design the specific actions need to ensure consumer safety. In most cases, it is too far removed from everyday life. To design effective interventions that deliver consumer safety, scientific assessments need to be based on an understanding of dose-response relationships, usage, and exposures. Without this, interventions risk triggering unintended trade-offs that increase net harms or a loss of safe enjoyment of benefits.

  Use of intrinsic properties to legitimate and shape harm mitigation measures poses a number of additional problems: **it does not provide the information needed to transparently assess trade-offs and risk-benefit issues or to legitimate the use of the powers of the State.**

2.4.2. Governance Opportunities

- **The merits of a new EU agency** – rather than dispersing the responsibilities of the existing committees, a better approach, and one that would be in the public interest and protect consumer safety, could be to create a new agency focused on non-food consumer safety. This could contain and support the independent scientific committees, as well as providing an institutional architecture that could provide an implementing mechanism for a wide range of 'vertical' product safety legislation, as well as laws regulating the use of detergents and cosmetics. It would be a model of good practice, focusing on products that are essential to the quality of life of Europeans.

- **The importance of regulatory principles for consumer safety** – instead of seeking to base regulatory interventions on intrinsic properties, the review of governance should be used to establish a clear statement of the regulatory principles for consumer safety, building on the successful model established in the late 1990s and confirmed in 2015[8]. This statement should include, amongst other requirements, a commitment to focus on consumer safety as the social objective of interventions and likelihood of harm as the principal regulatory approach.

3. Conclusions

Consumer safety depends upon assessments of the likelihood of harm carried out by relevant, eminent experts and based on an understanding of exposures derived from the best and most

[7] See for example, ERF Highlights Note 7 *'Hazard-based Regulation – Acknowledging the Problems'* (2015).

[8] See Commission Decision 97/579/EC *'Setting up Scientific Committees in the field of consumer health and food safety'* (1997), and subsequent Decisions in 2004, 2008, and 2015.

up-to-date scientific evidence. Science and expertise, regardless of provenance, protects citizens and ensures safe enjoyment of benefits.

The present EU-level governance of consumer safety is highly effective. It ensures that legislative objectives are delivered, protects consumers, facilitates safe enjoyment of benefits, and helps prevent regulatory failure. There is no evidence that the existing approach based on independent scientific committees is failing or needs to be restructured. It continues to deliver high quality harm mitigation measures that are trusted, effective, and predictable.

Looking to the future, the existing model of independent scientific committees can be improved in two critical areas: access to expertise and to the availability and utilisation of the most advanced science in scientific assessments. To facilitate this, the European Commission needs to adopt new policies for the selection of experts and functioning of committees, and for the use of evidence derived from New Approach Methodologies (NAMs). These should recognise modern understanding of conflicts of interest, and should welcome new approaches to regulatory toxicology.

However, **the greatest threat to the future effectiveness of consumer safety regulation in the EU comes from the risk posed by inappropriate reforms of governance of scientific assessments.** Specifically:

- Basing interventions on intrinsic properties of materials, rather than the likelihood of harm, will weaken consumer safety; and,

- Proposals to absorb the functions of independent scientific committees into the other EU bodies, ostensibly to reduce administrative costs, would return the governance of scientific committees in the EU to the situation of the mid-1990s, destroying a highly successful model without compensating improvements in consumer safety.

Instead, the review being undertaken by the European Commission provides an opportunity to strengthen the use and governance of the independent scientific committees, and the high quality opinions they produce, through the **creation of new, dedicated agency**.

At the same time and as part of the review of governance, the European Commission should take the opportunity to issue **a formal statement of the regulatory principles that guide regulation of consumer safety**. It should, for example, emphasise the importance of basing decisions on likelihood of harm rather than intrinsic properties of materials. It should also establish consumer safety as the sole purpose of regulatory interventions.

4. Recommendations

The European Regulation and Innovation Forum has identified a series of reforms that, if implemented by the EU institutions, will significantly improve the governance of scientific assessments used to protect consumer safety.

There are two groups of reforms: changes to the overall structure of governance of consumer safety assessments (section 4.1.); and, improvements that strengthen the governance and effectiveness of the existing scientific committees (4.2.).

4.1. Overall Structure of Governance

Recommendation 1: The **EU Legislator** should establish a **new non-food consumer safety agency**. This will support the existing independent scientific committees and provide, initially, the implementation mechanisms for legislation regulating cosmetics and detergents. Over time, the agency could expand its activities to support the implementation of other risk management laws that seek primarily to ensure consumer safety for sectors not covered by the existing agencies for medicines (EMA) and food (ECHA).

Recommendation 2: The **European Commission** should set out, for instance in a new Decision, a statement of the **regulatory principles for consumer safety**. This is a fundamental part of the governance framework. It should emphasise:

- **Consumer safety as the primary goal**;
- **Scientific evidence** as the foundation for interventions;
- Decisions based on **likelihood of harm**, best science, regardless of provenance, and expert understanding of exposures;
- Assessments undertaken by **independent experts**, organised on the basis of expert committees, with relevant and up-to-date knowledge;
- Selection of experts primarily on the basis of eminence and relevance;
- **Transparency** and impartiality of assessment processes; and,
- Institutional separation of risk assessment and risk management

Recommendation 3: The **European Commission** should fully **apply Better Regulation mechanisms and tools, including scrutiny by the Regulatory Scrutiny Board, when assessing any proposed changes in the governance of scientific assessments for consumer safety**. All assessments should examine the impact of proposals on consumer safety. Only governance proposals that can demonstrate credibly that consumer safety will be improved should be put forward for adoption.

4.2. Governance and Effectiveness of Existing Scientific Committees

Recommendation 4: The **European Commission** should set out, for instance in a new Decision, the **key principles for the selection of scientific experts and the operation of scientific committees**, and the future non-food consumer safety agency, that reflect a comprehensive understanding of bias and the complex conflicts of interest that cause it, and the way in which knowledge is generated in modern economies.

Recommendation 5: The **European Commission** should develop and enforce **uniform guidelines for the selection of experts and functioning of committees**, and the future non-food consumer safety agency. Drawing from a new Commission Decision set out in

Recommendation 3, the guidelines should set out ways in which conflicts of interest can be managed such that regulators gain access to the most eminent and relevant expertise.

Recommendation 6: The **independent scientific committees** should jointly draw up **substantive guidance designed to encourage the submission by regulated companies of scientific knowledge derived from New Approach Methodologies (NAMs)**. They should commit to utilising such knowledge whenever NAMs prove to deliver more accurate and reliable evidence. The guidance should also explain to regulators and scientific committees how to interpret appropriately these new forms of knowledge as they develop and evolve, such that exposures and the likelihood of harm can be assessed with the greatest possible accuracy. In addition, the EU legislators should introduce amendments to relevant legislation to ensure the inclusion of knowledge derived from NAMs in risk assessments.

European Regulation and Innovation Forum
March 2022

Richard Meads, the European Regulation and Innovation Forum's Rapporteur, wrote this Policy Note. However, the views and opinions expressed in this paper do not necessarily reflect or state those of the European Regulation and Innovation Forum (ERIF) or its members.

Appendix A

Scientific Excellence in Consumer Safety

Science-Based Decision-Making Workshop

Thursday 18 November 2021
09h30-12h45 CET
Online (via Zoom)

Programme

This ERIF workshop will contribute to the evolution of the EU's approach to the management of consumer safety. It will be held under The Chatham House Rule and will focus on identifying ways of ensuring scientific excellence and impartiality, considering two perspectives: scientists who undertake risk assessments and who strive to deliver high quality opinions; and, second, the framework of governance that fosters such outcomes.

Two distinguished panels will address these issues, focusing on scientific as well as institutional issues.

09h15 Opening of Zoom connection

Session I - Science Perspective

09h30 Welcome and Introduction: **Howard Chase**, ERIF Chairman

Logistics by Moderator: **Dirk Hudig**, ERIF Secretary-General

09h40 Lead Speaker
Sir Colin Berry, Emeritus Professor of Pathology, Queen Mary and Westfield College, London University

09h55 Panellists Interventions
Karl-Heinz Jöckel, Professor of Medical Informatics, Biometry, and Epidemiology at the University of Essen
Daniel Dietrich, Professor of Human and Environmental Toxicology at the University of Konstanz
Paul Carmichael, Endowed Professor of Next Generation Risk Assessment Approaches for Human and Environmental Health at Wageningen University and Senior Science Leader, Safety and Environmental Assurance Centre (SEAC), Unilever

10h20 Discussion and Q&A

11h00 Close Science Session

Session II - Governance Perspective

11h15 Introductions by Moderator: **Dirk Hudig**, ERIF Secretary-General ERIF

11h20 Lead Speaker
Richard Meads, ERIF Rapporteur

11h35 Panellists Interventions
Jim Bridges, Emeritus Professor of Toxicology and Environmental Health, University of Surrey and a former Chair of SCTEE, SCC, and SCHENIR committees
Sue O'Hagan, Director Scientific Affairs and Food Safety at PepsiCo and former regulatory toxicologist at the UK Department of Health
Angus Cameron International Regulatory and Pharmaceutical Registration expert

12h00 Discussion and Q&A

12h40 Chairman's summation and comments

12h45 Close of Workshop

European Regulation and Innovation Forum
November 2021

European Regulation and Innovation Forum

The European Regulation and Innovation Forum (ERIF) is an expert-led and not-for-profit think tank with the aim of promoting high quality decision-making by the EU institutions through Better Regulation. The ERIF was known as the European Risk Forum until January 2021.

In order to achieve this, the Forum applies the expertise of a well-established network of experts to 'horizontal', cross-sectoral issues. In particular, it addresses regulatory governance, decision-making structures, tools, and processes; the risks and benefits of new and emerging technologies, and of lifestyle choices; obstacles and incentives for innovation, including the regulatory framework; and, the importance of high quality scientific evidence for better regulation. This approach is highly relevant at present, as the EU recovers from the COVID-19 pandemic and undertakes an effective and proportionate transition to the new economic and societal models pursued by the European Green Deal.

Better Regulation is one of the pre-conditions for delivering these goals. It seeks to strengthen consent to law-making and to the actions of the State needed to implement legal requirements. Accordingly, laws and regulations should be:

- Necessary, effective, and proportionate (resting on a rigorous definition of the policy objectives, as well as a clear and comprehensive description and assessment of problems and their underlying causes);
- Based on credible evidence, particularly science, that supports the use of the powers of the State;
- Informed by a robust and transparent understanding of costs and benefits, particularly dynamic impacts such as risk-risk tradeoffs;
- Demonstrate that benefits justify costs;
- Developed using transparent and participatory decision-making processes; and,
- Reviewable over time and subject to appeals and redress mechanisms

High quality decision-making, notably risk regulation, should take place within a structured framework that emphasises a rigorous and comprehensive understanding of the need for public policy action (risk assessment), and a transparent assessment of the workability, effectiveness, costs, benefits, and legitimacy of different policy options (risk management).

Achieving these goals is likely to require extensive use of evidence (especially science); rigorous definition of policy objectives; clear and comprehensive description and assessment of problems and their underlying causes; realistic understanding of the costs and benefits of policy options; and extensive consultation.

These principles and requirements form part of the approach to regulatory decision-making set out by the OECD since 1995. The approach to risk regulation promoted by the WTO also makes explicit reference to these principles and practices.

The ERIF is supported principally by the private sector. The ERIF does not seek to promote any specific set of values, ideologies, or interests. Instead, it considers high quality risk assessment and risk management decisions as being in the public interest. An advisory group of leading academics supports the ERIF's work.

The Forum works with all EU institutions to promote ideas and debate. Original research is produced and is made widely available. As an expert group, the Forum brings together multiple sources of evidence (such as the experience of practitioners and policy-makers; non-EU good practices; and academic research) to assess issues and to identify new ideas. The ERIF directly engages in EU regulatory reform debates through targeted lunches and roundtables. The Forum also regularly contributes to public consultations launched by the EU institutions. A key feature of the ERIF's approach is its emphasis on expert-to-expert dialogue to share views and learn from good practice.

For more information visit www.eriforum.eu or contact info@eriforum.eu:

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