Chapter 9

Evolution and implications of public risk communication strategies on BSE
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Risk communication strategies are interesting and important for several reasons. The conclusions of the British Public Inquiry into BSE suggest that almost everything that went wrong in British BSE policy-making occurred as a consequence of failures of communication (Phillips et al., 2000, Vol. 1). Risk communication problems may not have been the only kinds of problems, but they certainly have been, and remain, extremely important. Risk communication has not, however, just been a problem historically in relation to BSE; it remains a formidable challenge to public policy-makers with respect to the entire gamut of policy-making, and especially in relation to science-based risk issues.

It is widely acknowledged that there is a crisis in science and governance (House of Lords, 2000; Commission of the European Communities, 2000). Old ways of conducting, or at any rate of representing, science-based public policy-making have become scientifically and democratically unsustainable. Historically, a dominant assumption, from a “technocratic” perspective (see Chapter 7), has been that risk communication was a strictly downstream or “tertiary” activity, because it arose only once scientific and policy deliberations had been completed. Such a conception of risk communication is not one that can readily account for the history of BSE policy-making in the United Kingdom or in other EU Member States, and has lost much of its plausibility across the entire spectrum of policy-making. There is now a growing recognition that policy-making processes need to be more consultative and participative, especially in the light of scientific uncertainties. Risk communication is therefore increasingly seen not just as a tertiary consideration, but rather as a fundamental challenge and one that is coupled directly with risk appraisal and policy decision-making. One key challenge for this project has been to identify what would be the main characteristics of a viable and constructive risk communication strategy for BSE, or in other science-based risk policy issues, and how considerations of risk communication can most effectively contribute to overall risk policy-making.

The concept of a risk communication strategy can be interpreted narrowly or widely. A narrow interpretation would focus essentially on the communicative activities of government departments in their relationship with consumers and the general public. In this study, however, the team has chosen to interpret the concept more widely. Communicative activities between government policy-makers and members of their general publics are important, but the focus needs to be broader. Within the four countries covered in this book (the United Kingdom, Germany, Italy and Finland) BSE policies have been decided by senior government ministers in collaboration with their senior officials. Their decision-making processes have, however, been embedded in broader advisory and administrative structures, including, for example, official veterinarians, laboratories, those responsible for veterinary and clinical surveillance, advisory committees, and officials and institutions responsible for regulatory enforcement.

To deal with a policy challenge like BSE, the public sector policy regime also has to engage with representatives of
farmers, the slaughterhouse industry, the rendering industry, the animal feedstuffs industry, the food processing industry, butchers and food retailers, not to mention representatives of consumers and public health professionals. The study team interpreted the concept of official risk communication strategies in a broad sense to include communication within the broader public policy community and between public officials and key industrial, technical and scientific stakeholders and their representatives, as well as with consumers and citizens. Ensuring effective communication between policymakers, their scientific advisers, senior officials, enforcement officers, abattoir managers, food processing companies and veterinarians may be no less important than communication between policymakers and citizens.

The central unit of analysis of this chapter is what the study team refers to as a “risk communication strategy”. It is important therefore to clarify the meaning ascribed to this concept. Firstly, the main actors whose risk communication strategies are being analysed are national governments (in this study, the governments of the United Kingdom, Germany, Italy and Finland). A government has a risk communication strategy to the extent that there is an underlying systematic pattern to the selection and orientation of the messages it disseminates concerning what is known, and what is being done, about a risk. While many aspects of a risk communication strategy will be deliberate, a strategy may also have unintended characteristics. Since it is clear that risk communication strategies have changed over time, this study’s descriptions and analyses will refer to the evolution of those strategies as much as to their characteristics during particular periods.

The study team conducted empirical research into the risk communication strategies of the governments of the United Kingdom, Germany, Italy and Finland. In each jurisdiction, documentary material was gathered and interviews were conducted with representatives of government departments responsible for BSE policy, expert advisory committees, the media, industry and consumer groups. For the analysis in the United Kingdom, the empirical evidence made available by the Phillips Inquiry was a rich source of information on the historical characteristics of BSE risk communication strategies. Since BSE policy-making began in the United Kingdom in the mid-1980s, but became salient in the other jurisdictions at later dates, the temporal scope of the study team’s studies and analyses differ between the four countries. BSE policy-making gained salience in Germany in the late 1980s, but in Italy salience developed only in the 1990s. In the Finnish case, BSE hardly had any salience whatsoever until after 20 March 1996, although that date transformed the BSE risk communication challenge in all jurisdictions.

The phase structure of official BSE risk communication strategies in Germany, Italy and Finland has been rather different to that in the United Kingdom. In each of these countries, there was an early relatively tranquil phase when BSE was presumed not to represent a hazard, just so long as British beef was not consumed. The second phase erupted once domestic cases of BSE emerged,
Evolution and implications

while later phases correspond to the introduction of active BSE surveillance in place of the previously more passive regime.

**The United Kingdom**

BSE has primarily been a British problem, although it has been and remains a policy challenge for many jurisdictions. In one of its few barbed comments, the report of the Public Inquiry into BSE policy in the United Kingdom characterized official risk communication strategy on BSE (at least up to March 1996) as having been one of attempted “sedation” (Phillips et al., 2000, Vol. 1, para. 1179: 233). Nothing that the study team has found during research has led it to contradict that judgment, but it will supplement that statement with a more detailed account of changing tactics within the overall strategy. The study team suggests four discrete phases of the evolution of the British Government’s BSE risk communication strategy.

• **Phase I: concealment**

The initial phase began when staff in the Pathology Department of the Central Veterinary Laboratory (CVL) of the Ministry of Agriculture, Fisheries and Food (MAFF) first identified a novel cattle disease in November 1986. It came to an end in October 1987 when the first public reports of BSE emerged. During this first phase, MAFF’s strategy was to prevent any information whatsoever about BSE from being disclosed to anybody outside a relatively small circle of senior staff in MAFF and at the CVL. The very existence of the disease was deliberately concealed from all other parts of the British Government, as well as from the broader veterinary community, farmers, consumers, the medical profession and the rest of the world.¹

The strategy was adopted firstly by senior officials at the CVL, but then adopted even more vigorously within MAFF. Senior officials in CVL were concerned about protecting the laboratory’s reputation for scientific and veterinary competence, and were therefore anxious that the existence of the disease should not be disclosed until the CVL’s scientists could properly characterize the novelty. The decision (by the Chief Veterinary Officer) to tell the Secretary of State for Agriculture was not taken until he learnt that an independent veterinarian working in private practice, who had discovered a case of BSE, was planning to reveal the existence of the disease to a meeting of the British Cattle Veterinary Association in July 1987 and was about to accuse MAFF of a cover-up (Phillips et al., 2000, Vol. 3, para. 2.51: 24).

By late June of 1987, senior CVL staff were anxious that, if they failed to inform professional colleagues in the State Veterinary Service, veterinary practitioners and the relevant parts of the scientific research community, CVL would lose credibility with its peers. Officials at MAFF, however, were far more anxious about the vulnerability of

¹ The fine details of the process by which that policy was decided and implemented are set out in the discussion of “Dissemination of information — a chronology” in Vol. 3 The Early Years, 1986–1988, of the Phillips Inquiry Report.
of public risk communication strategies on BSE

export markets and the reputation of the department, or as one official euphemistically said: “... the veterinary political viewpoints must be respected” (Phillips et al., 2000, Vol. 3, para. 2.68: 29).

Academic papers on the early cases of BSE were eventually published by MAFF scientists in the Veterinary Record in October and November 1987 — one year after the first cases were diagnosed (Wells et al., 1987). By then, with the numbers of cattle that had been diagnosed as having BSE rising rapidly, the media began to take an interest in the new disease (Phillips et al., 2000, Vol. 3, paras 2.111–2.116). During this initial phase, non-disclosure was justified in part by reference to the severity of the underlying scientific uncertainties. It is ironic, therefore, that one of the key characteristics of the second phase was that officials at MAFF radically understated the scientific uncertainties.

During Phase I, the British Government imposed no regulatory restrictions on meat from cattle with BSE, or on the composition of animal feedstuffs or the human food-chain. It remained entirely lawful in the United Kingdom to sell meat from animals known to have died from BSE. The covert risk communication policy adopted by MAFF during this first phase also involved deliberately not informing or involving the staff of MAFF’s own specialist scrapie research institute known as the Neuro-pathogenesis Unit. The consequences of that decision included delaying collaborative research between the staff at CVL and the United Kingdom’s leading experts in transmissible spongiform encephalopathies and inhibiting the detection, diagnosis and reporting of the disease in British herds.

• Phase II: understatement

Phase II of the United Kingdom’s official BSE risk communication strategy commenced once the existence of BSE became known outside the small closed circle of senior staff at the CVL and MAFF. The transition from Phase I to Phase II can be dated to the weekend of 23–25 October 1987, when media articles reporting BSE appeared for the first time. (See, for example, Farming News, 23 October 1987; Sunday Telegraph, 25 October 1987.) During this second phase, the British authorities introduced some important regulatory restrictions, starting in July 1988 with a ban on the use of potentially contaminated ruminant protein (i.e. slaughterhouse waste from cattle and sheep) in the feed of other ruminants and a ban on the use of clinically affected cattle in the human food-chain.

Once those regulatory restrictions had been introduced, MAFF’s primary BSE risk communication strategy was to try to transmit a consistently reassuring narrative to the British public and to representatives of all other markets. MAFF also, however, tried to adopt a slightly different strategy internally within the confidential parts of the British Government. The external message was constructed from two main elements. One key component was to claim to possess robust scientific knowledge about BSE, while the second was to claim that the risks to human consumers were nonexistent, or negligibly slight. On the other hand, MAFF and especially CVL
Evolution and implications

officials were very concerned about the limitations of their knowledge about BSE, and the risks that it might pose.

The predicaments of MAFF and the CVL were complicated by the fact that, under the British Government’s macroeconomic strategy at that time, there was an overall goal of reducing public expenditure, and this was being applied vigorously to support for scientific research. The resources of MAFF and the CVL were insufficient to invest in the necessary research on BSE that would rapidly have diminished the key scientific policy-relevant uncertainties about issues such as pathogenesis and inter-species transmissibility. MAFF assumed that it could only have invested heavily in BSE research by cutting other food safety research budgets. Extensive cuts had already been made in the early 1980s, and MAFF was being criticized for underinvestment in other areas of food safety research. MAFF therefore needed to try to obtain extra funding to support BSE research by cutting other food safety research budgets. A key step in the implementation of the second phase of MAFF’s BSE risk communication strategy involved the creation and management of the Southwood Working Party, which was the first attempt to provide external independent scientific assessment of the risks that BSE might pose. Expert advisers played a complex role in the implementation of the Government’s risk communication strategy. That role involved both the communication relationships between advisers and the wider public as well as those between advisers and the policy-making community. These are addressed below.

- **Expert advice and risk communication**

Many British expert committees, among which the Southwood Working Party was no exception, play an important role in risk communication. Indeed, for government, drawing on expert advice has advantages in so far as policy decisions appear to be endorsed by an independent and highly credible authority. As one senior MAFF official recalled:

> … people do not believe what ministers say, inherently they [the people] do not believe what they [the ministers] say, therefore you have to turn to external bodies to try to give some credibility to public pronouncements ...


The Southwood Working Party members were clearly aware that their report would be a public document. They recalled that they were “… mindful of the disastrous consequences of an alarmist report …” (Southwood et al., 1999, para. 4). By “disastrous” the Committee members explained that they meant, in part, the possible economic consequences for farmers and those involved in the livestock industry (BSE Inquiry transcript, 21 July 1999: 7, in Phillips et al., 2000).
When the Southwood Working Party was first set up it initially appeared reluctant to contribute to, or to endorse, the Ministry of Agriculture’s risk communication strategy. For example, the chair of the Southwood Working Party was explicit in his concerns about the absence of evidence regarding BSE. He told journalists that: “If the agent has crossed from one species to another there is no reason why it should not cross from cattle to man” (Erlichman, 1988b).

Soon after the Working Party started to meet, however, it began, in effect, to acquiesce with the Government’s risk communication priorities. The first draft of the committee’s report, written a few weeks after the comment to journalists, described the risks of transmission to humans as “remote”, but that phrase had been provided by civil servants (BSE Inquiry transcript 21 July 1999: 27–28. In: Phillips et al., 2000). Similarly, in its published report, the committee decided deliberately to downplay discussion of the risks from consumption of asymptomatic cattle tissues, especially since there were no restrictions on consumption of asymptomatic animals and because the committee did not recommend any such restrictions. In private correspondence, the Chair of the advisory committee acknowledged that his committee had decided “not to press the point” about the possible risks from asymptomatic animals on the grounds that it did not want to cause excessive alarm, given the likelihood that BSE would behave like scrapie and be harmless to humans (Phillips et al., 2000, Vol. 4, para 10.66).

Another more specific manifestation of the intention not to be alarmist was in relation to non-food sources of exposure to the BSE pathogen. The Chair of the committee recalled, for example, that the committee members “really thought the medical problem was severe” because of the use of bovine materials in the manufacture of pharmaceutical products such as vaccines (Phillips et al., 2000, Vol. 4, para. 10.83). Early drafts of the Working Party’s report had drawn attention to those concerns but the members were persuaded by the Department of Health secretariat to modify the relevant passage of the committee’s report on the grounds that public confidence in the vaccination programme might have been put in jeopardy (and because the authorities had already privately been alerted to the possible risks). Indeed, the Working Party adopted verbatim the Department officials’ suggested wording for the relevant section of their report (Phillips et al., 2000, Vol. 7, para. 5.21).

The Southwood Working Party also played an important role in communicating risks to the BSE policy-making community, i.e. policy officials, ministers and the agricultural and food industries. In at least two respects that role was problematic. First, there is evidence that the Southwood Working Party was initially set up, under slightly fraught conditions in the spring of 1988, so as to transmit and to endorse the views of officials to their ministers (Millstone & van Zwanenberg, 2001). By early 1988, with reported cases of BSE increasing rapidly, MAFF officials had become concerned that, unless ministers introduced a policy to slaughter and destroy clinically affected animals in order to keep their meat out of
the food-chain, ministers would be held responsible if it later transpired that BSE was transmissible to humans (Phillips et al., 2000, Vol. 3, para. 5.41). Senior MAFF officials therefore recommended in February 1988 that the Minister of Agriculture, John MacGregor, should authorize the introduction of a slaughter policy with compensation payments to the farmers. MacGregor resisted that advice because he was anxious that any regulatory action would undermine confidence amongst domestic consumers and in export markets too. MAFF officials then insisted on consulting the Chief Medical Officer (located in the Department of Health) who, in turn, insisted on the creation of an external expert advisory group — the Southwood Working Party — not because he doubted that MAFF or the Department of Health possessed the requisite expertise, but because he judged that advice from eminent external experts would significantly contribute to changing the ministers’ minds.

The first step taken by the Southwood Working Party was to recommend that animals clinically affected with BSE should be excluded from the food-chain for both humans and animals. That advice was reluctantly accepted by MacGregor. The Southwood Working Party did not provide scientific expertise that was unavailable within the civil service. It was established primarily to provide officials in MAFF and the Department of Health with a political resource with which to persuade MAFF ministers of the importance of introducing consumer protection regulations. They believed that agricultural ministers and the Treasury would not otherwise have accepted those regulations. Second, Southwood has indicated that the Working Party’s decisions were influenced not just by its scientific judgements but also by assumptions it was making about what might or might not be politically acceptable to government ministers. In 1996, Southwood explained: “We felt [a ban on bovine brain material from food products] was a no-goer. They [MAFF] already thought our proposals were pretty revolutionary” (Pearce, 1996). That remark implies that direct pressure from officials had not been required, in this case, to influence the committee’s eventual recommendations — anxiety about upsetting ministers seems to have been sufficient. It is important to recognize that the members of the Southwood Working Party did not make explicit the political judgments that they had made when deciding not to recommend restrictions. Instead they chose to provide the impression, in public, that the risks were negligible, and as if their decision not to recommend restrictions was purely scientific. They stated, for example, that the risks of consuming bovine brain and lymphatic tissues from asymptomatic cattle would not even justify labelling of products containing central nervous system tissue (MAFF/Department of Health, 1989, para. 5.3.5).

One consequence was that many policy actors did not think that there was any scientific case whatsoever for restricting the consumption of asymptomatic animals. Third, although the Southwood report sometimes attached caveats to its more reassuring statements, the fact that the underlying scientific evidence was so fragmentary, fragile and indirect was not always made explicit. Privately, however, the committee acknowled-
of public risk communication strategies on BSE

ged, in correspondence with medical colleagues, that their scientific assessment was essentially “guesswork” (Phillips et al., 2000, Vol. 4, para. 10.33). Several ministers and officials have claimed that they were largely unaware of the fragility of Southwood’s conclusions (Phillips et al., 2000, Vol. 4, para. 11.6). It would appear that the frank advice from the Southwood Working Party about the risks from BSE was not communicated beyond the small circle that initially received it.

In general, the members of the Southwood Working Party and the relevant government departments failed to acknowledge explicitly the policy contexts in which they developed their advice and within which their appraisal was conducted. Political framing commitments clearly shaped the production of the advice from the Southwood Working Party, even though its report was presented in ways that concealed those factors and suggested that the risk assessment was purely scientific and entirely apolitical. That subterfuge suited MAFF officials and ministers because it allowed them to argue that they were doing what, and only what, their scientific advisers recommended, and it allowed officials to use the ostensible scientific authority of the committee to persuade the public, the Treasury, other government departments, ministers and the beef industry to accept some of their policy preferences. It also served to flatter the scientists by representing them as authoritative and influential. The study team’s analysis indicates, however, that those arrangements not only allowed political decisions to be taken under the guise of science but also that the spectrum of policy choices available on BSE was rendered opaque to ministers, the broader policy community and the general public.

• A strategy of sedation
After the publication of the report of the Southwood Working Party, MAFF’s overt risk communication message was a narrative of reassurance. The comment from the Southwood Working Party that the risk to humans from BSE was “remote” was interpreted by senior MAFF officials, ministers and many in the meat industry as showing that the risk was nonexistent or entirely negligible. By representing the provisional judgement of Southwood and his colleagues as if it were final and definitive, MAFF officials embraced a strategy of pretending to be in possession of fully certain science that had established that risks were nonexistent or negligible. Nevertheless, some senior officials were being told, both by the scientific experts on whom they claimed to be relying and by many in the wider scientific community, that it was impossible to be certain that consuming meat, milk and dairy products from animals with BSE posed no risk to consumers, that evidence definitely to answer such questions could not be expected for many years, and that one could not demonstrate the absence of the BSE agent from the human food-chain. The contrast between the following private and public statements is singularly revealing.
Evolution and implications

In private, 1988: "We cannot answer the question ‘is BSE transmissible to humans’”
(MAFF scientist).①

In public, 1989: "I am totally and completely sure that there is no risk to man from eating beef”
MAFF Chief Veterinary Officer).②

In private, 1990: "It would not be justified to state categorically that there was no risk to humans”
(Scientific adviser).③

In public, 1990: "... clear scientific evidence that British beef is perfectly safe”
(MAFF Minister).④

In private, 1990: "Such agent that does remain may ... still accompany some preparations of meat”
(Scientific adviser).⑤

In public, 1992: "It isn’t possible for BSE to enter the human food-chain”
(MAFF Chief Veterinary Officer).⑥

The Department of Health, which had a subordinate role in BSE policy-making generally, also adopted a low profile on BSE risk communication. As one Department of Health official explained to a colleague, in 1990: "We decided some time back to leave MAFF in the lead in providing information on BSE since there was a real chance any subtle differences in material provided by the two departments would be exploited by the media” (Phillips et al., 2000, Vol. 6, para. 4.680). Nevertheless, there were several occasions on which public statements on BSE risk were made by the Department of Health, in particular by the Chief Medical Officer. Most of those statements were similar to those of MAFF officials and ministers in so far as they were intended to reassure consumers that beef was safe.

The Government’s statements about the safety of British beef were echoed by the farming and meat industries. The main industry body to take an active role in risk communication about BSE was the Meat and Livestock Commission — a partially publicly funded body. The Commission repeated the same messages being given by the British Government but also issued statements that were inaccurate and misleading. For example, in May 1990, in the wake of intense press interest in BSE, the Commission issued a press release that stated:

All the scientific evidence — as opposed to conjecture, rumour and guess — provided by leading veterinary surgeons and scientists in the United

④ Hansard, 8 June 1990, column 906.
⑤ Phillips et al., 2000, op. cit. Vol. 11, para. 4.120.
Kingdom and the rest of the EEC has indicated that British beef is perfectly safe to eat. Even if no further action had been taken following the outbreak of the disease there was considered to be no risk to consumers from eating beef (Meat and Livestock Commission, 1990).

From the publication of the Southwood report in February 1989 until March 1996, MAFF ministers and senior officials endeavoured to remain loyal to, and indeed were locked into, the narrative that risks from BSE were non-existent or negligible. In that intervening period, however, the scientific case, the policy case and the British Government’s communication strategy unravelled. That process of unravelling was driven by four sets of forces.

• The narrative unravels
Firstly, Southwood and his colleagues had expressed the hope that the risks to humans from BSE were “remote” on the basis that BSE would behave in exactly the same way as scrapie and would not therefore transmit to humans. On numerous occasions, however, evidence emerged showing that BSE could be, and had been, transmitted to a far wider range of different species than had previously been assumed.

In 1990, for example, domestic cats began to be diagnosed with a spongiform encephalopathy. The cases of feline spongiform encephalopathy not only indicated that BSE was transmissible across species, and by a feed route, but they also indicated that BSE had a host range that was evidently different from that of scrapie because cats were not thought to be susceptible to scrapie. That point was clearly recognized by the Government’s scientific advisers [BSE Inquiry transcript, 24 March 1998: 128. In: Phillips et al., 2000]. In public, however, MAFF’s Chief Veterinary Officer responded by representing the cases of FSE as inconsequential (Phillips et al., 2000, Vol. 5, para. 3.149). Other evidence also indicated that BSE and scrapie had different transmission properties and a different pathogenesis (Phillips et al., 2000, Vol. 2, paras. 3.48–3.61). Taken together, this evidence did not indicate that BSE would pose a risk to human health but it did suggest that an analogy with scrapie could not be relied on to provide reassurance.

Secondly, critical analyses of MAFF’s reassuring narrative were articulated by a handful of independent scientific experts, including a retired neurologist (Helen Grant), a Leeds University professor of microbiology (Richard Lacey), a clinical physician (Stephen Dealler) and a microbiologist at the Government’s Public Health Laboratory Service (Harash Narang). Even though many of the arguments advanced by that group of experts were subsequently shown to have been well grounded and entirely legitimate, between 1989 and March 1996 they were repeatedly ridiculed and discredited by officials from MAFF, CVL and the Department of Health. The Agriculture and Health Select Committees of the House of Commons also contributed to the attacks on these scientists in ways that, at the time and in retrospect, did them no credit.

The official response of MAFF to the arguments of these scientific critics was, in effect, to insist on interpre-
ting the absence of proof that BSE posed a risk to human health as if it amounted to proof that BSE was perfectly safe (Phillips et al., 2000, Vol.1, para. 1180). Moreover, having asserted that the science of BSE was adequate, robust and entirely reassuring, MAFF’s risk communication strategy put the department into a corner because officials and ministers could not readily respond constructively to new data or critical comments without fundamentally undermining the narrative and the reassurance.

A third source of information that contributed to the unravelling of MAFF’s reassuring narrative came from some members of the domestic news media. A journalist on the Guardian newspaper, James Erlichman, played a key role in questioning and challenging many of the weaker aspects of the official narrative, as did Andrew Veitch on the television programme Channel Four News. While some newspapers did articulate the Government’s reassuring narrative, it was evident to many in the United Kingdom that the majority of media personnel with a professional interest in BSE found the Government’s account unconvincing.

The fourth source of problems for the British Government’s attempt to maintain confidence in the market for British beef came from regulatory decisions taken by countries outside the United Kingdom — in particular Austria, France, Germany, the United States of America and eventually the European Commission. Many non-EU countries such as Australia, Finland, the Russian Federation and Tunisia banned the import of all British cattle in the period between late 1988 and 1990 (MAFF, 1990). Within the EU, the European Commission struggled to maintain a market in British beef but unilateral controls were temporarily imposed by France and Germany in 1990. The European Commission responded by implementing slightly stricter controls on exports of British beef than those that existed domestically.

The evident reluctance of countries outside the United Kingdom to accept British beef and bovine animal products or the reassurances articulated by the British Government contributed to undermining such confidence as the British public may have had in MAFF’s risk communication strategy. This reluctance also provided the British Government with an opportunity to interpret and domestically represent those restrictions as symptomatic of anti-British prejudice and of narrow nationalistic trade protectionism on the part of foreign governments. The fact that official criticisms from the United Kingdom were directed towards other European countries, rather than to the United States, implies that nationalistic and strategic considerations also influenced British policy-makers.

The British Parliament had a nominal role in scrutinizing government policy. In respect of BSE policy, however, Parliament was noticeably ineffective. A very small number of parliamentarians did ask a few difficult questions, particularly in 1988, but once the Southwood report was published most parliamentarians ceased to question or challenge MAFF’s risk communication narrative. After the emergence of FSE in 1990, the level of media reporting on BSE in the United Kingdom rose rapidly. The response of the House of Commons Agriculture Select Committee was to hold a set of hearings, and to publish a
of public risk communication strategies on BSE

In October 1990, the MAFF report endorsed MAFF’s narrative almost entirely, representing the absence of proof of a risk as if it amounted to proof of the absence of any risk (House of Commons, 1990).

In the middle of this second phase of MAFF’s risk communication strategy, i.e. in 1993, MAFF employed academic consultants to provide a confidential assessment of MAFF’s own risk communication strategy (Breakwell & Purkhardt, undated). The document remained confidential until after March 1996 and it is not difficult to see why MAFF chose not to publish it. The Breakwell & Purkhardt report concluded that MAFF completely lacked a risk communication strategy, or at any rate a coherent one, and it possessed no mechanisms for evaluating the effectiveness of its risk communication. Breakwell & Purkhardt also reported that none of the officials in MAFF’s Animal Health Group accepted the proposition that the public should be given a full explanation of food risks. Instead the officials believed that the public did not need any detailed explanations of risks or of the reasons for Ministry actions. Staff in the Animal Health Group did not believe that the public could distinguish between hazard and risk, and assumed that the public only understood safety as an absolute concept. That implies that MAFF’s risk communication strategy was intended to tell the public what MAFF officials wanted them to believe, not to provide a frank, full or accurate account of the science or of regulatory policy.

In the autumn of 1995, however, the rate at which MAFF’s reassuring narrative unravelled accelerated. On 1 December 1995 the BBC Radio 4 consumer programme You and Yours broadcast an interview between James Erlichman and Professor Sir Bernard Tomlinson, a very senior clinician and government adviser on the future of London’s hospitals. Tomlinson remarked:

Until we can say quite positively there really is no evidence now that BSE transfers to humans, until we can say that, I believe we’ve got to pay that price and all offal should be kept from public consumption. But I certainly don’t eat any longer beef pies, for instance, or puree, I wouldn’t eat a burger”

(Phillips et al., Vol. 6, para. 6.273: 623).

Tomlinson was by no means the first or last to express such doubts about the safety of British beef (prior to 20 March 1996), but he was one of the most authoritative, influential and eminent experts to contradict the MAFF risk communication narrative.

The response of the British Government to the unraveling of its reassurances and sedating narrative was to assert them with ever-greater vigour. On 3 December 1995, the Secretary of State for Health, Stephen Dorrell, agreed during a television interview that it was “inconceivable” that BSE posed any risk to human health (Phillips et al., Vol. 6, para 6.280: 625). A pivotal moment occurred on 8 March 1996 when the CJD Surveillance Unit informed the Spongiform Encephalopathy Advisory Committee (SEAC) of findings of 10 cases of what appeared to be a new variant of CJD. None of those internal exchanges were open to public scrutiny until the
Daily Mirror revealed the imminent crisis on the morning of 20 March 1996. On that day Dorrell was obliged to go to the House of Commons and announce that a new variant of Creutzfeldt-Jakob disease had emerged in at least 10 young people in the United Kingdom, and that the most likely source of infection was BSE-contaminated foods (Hansard, 1996, col. 375–376). The events that culminated in Dorrell’s statement to the House of Commons mark the end of the second phase of the British official BSE risk communication strategy and the start of phase three.

**Phase III: belligerence and the “Beef War”**

The third phase began on the afternoon of 20 March 1996. With the previous reassuring narrative having disintegrated, the MAFF shifted to a new narrative, the primary feature of which was that, if there had ever been a significant risk from eating British beef, then it had occurred during the mid- to late 1980s. Now that all regulations were being fully enforced, and tightened, British beef was as safe as any other European beef.

The persuasiveness of the British Government’s new reassurances after March 1996 was not evident in continental European countries, or in the United Kingdom’s other potential export markets. The European Commission, in collaboration with all other EU Member States, prohibited British exports of live cattle, meat and meat products from cattle and mammalian-derived meat and bone meal to any part of the world (European Commission Decision 96/239/EC). At a time when domestic confidence in the British Government’s ability properly to manage food safety risks was vulnerable, it responded by arguing to its domestic audience that the refusal of continental European countries to accept British beef (that was now as safe as any in Europe) was the product of anti-British prejudice and was totally devoid of any scientific legitimacy. It was during this phase that commentators in both France and the United Kingdom started to talk about what came to be known as the “Beef War”. As in almost all Member States (including particularly Austria, Finland and Germany), the British Government tried to emphasize what it represented as the dangers of foreign beef and the safety of the domestic supply.

In Chapter 6 of this book, Bauer et al., characterize this period as one during which MAFF focused on external blame management, damage containment, and national interests and identities. Public information did play some role in the Government’s risk communication strategy, but it was a somewhat ambiguous role. In the aftermath of the March 1996 crisis, MAFF was more open with many kinds of information about BSE than had previously been the case, but not with all. It was not until the intervention of the President of the Royal Society, in collaboration with a handful of equally eminent scientific experts, that MAFF reluctantly disclosed much of the basic epidemiological data about BSE that eventually allowed Anderson et al. (1996) to construct a remotely plausible model of the past, present and future of the epidemic of BSE in British herds.

In the immediate aftermath of the March 1996 crisis, the British Government threatened to disrupt a broad range of business at the European Council of Ministers unless barriers to continental imports of British beef were rapidly dismantled. Much of that belligerence may have
been for domestic consumption, but it contributed very little to resolving disputes or reassuring domestic consumers (see Chapter 5). That approach was, however, echoed extensively in parts of the British press.

Over a relatively brief period in late 1996, when the British Government was trying to persuade domestic and international consumers that British beef was safe, it started to talk about adopting policies to eradicate BSE. The word “eradicate” had been virtually absent from official British public discourse during the preceding ten years. It is ironic, therefore, that the report of the Phillips Inquiry (Phillips et al., 2000) retrospectively — and it might be said rather generously — misrepresented MAFF’s approach as if it had aimed at eradicating the risk, when in practice it had only ever aimed at reducing infectivity in cattle and the human food supply. The Phillips Inquiry cites several occasions when, behind closed doors, MAFF, CVL and SEAC considered the feasibility and costs of eradicating BSE, but the term was noticeably absent from all public discourse.

• Phase IV: enter the FSA

The final phase of the British BSE risk communication strategy is the one that endures at the time of writing, and which was accomplished by the creation of the British Food Standards Agency (FSA). Food safety policy had been so badly handled by the outgoing British Government that, on the day Tony Blair became Prime Minister in May 1997, he received in person a report from Professor Philip James recommending the creation of a Food Standards Agency. The FSA, which operates under the auspices of the Department of Health, did not become fully operational until 1 April 2000. Over the intervening period a transition occurred during which responsibility for the post-farm gate aspects of food safety policy-making were taken away from the Ministry of Agriculture, Fisheries and Food and transferred to the FSA. In the immediate aftermath of the general election in May 2001, Blair abolished MAFF and created the Department for Environment, Food and Rural Affairs (DEFRA) in its place. Since that date the United Kingdom has been the only EU Member State not to have a designated minister of agriculture.

Unlike MAFF, the FSA has a primary focus on the protection of consumers and public health. While it is supposed to “have regard” for the consequences of its decisions for the food trade, the FSA is not responsible for promoting the economic interests of farmers or the food industry. The primary responsibility for SEAC now lies with the FSA rather than with MAFF. The FSA also has a policy of thorough openness, quite unlike the policy of secrecy that was endemic in MAFF. The Board of the FSA holds its meetings in public. Under the direction of the FSA, SEAC now holds its meetings in public, and members of the public have an opportunity to raise questions and contribute comments. The BSE risk communication strategy adopted by the FSA is significantly different from that adopted by MAFF, even during what the study team has termed Phase III.

The FSA has abandoned any pretence that there are no risks from BSE. A recent leaflet entitled BSE and beef published by the FSA explicitly points out that “the risk from BSE cannot be removed completely” (FSA, 2001). SEAC has
estimated that fewer than one infected animal per year is entering the British food supply, and SEAC and the FSA judge that the residual level of infectivity is low enough to justify allowing British beef to be sold, just as long as it satisfies the requirements of the Over-Thirty-Month scheme and the other prevailing restrictions. The FSA Board interprets the evident stability of the level of beef sales in the United Kingdom as providing a reliable indication that British consumers are persuaded that British beef is now acceptably safe. The FSA has also ceased to pretend that the science of BSE is secure, let alone complete. SEAC and the FSA now acknowledge far more of the scientific uncertainties than was ever the case with MAFF.

The FSA has been actively and openly conducting a review of BSE controls. The FSA did not simply ask SEAC for its opinion, or consult wider stakeholders only after it had definitive proposals to publish, as MAFF might have done. The FSA has sought detailed advice from SEAC, but it has also been actively soliciting, and receiving, views and information from a broad range of stakeholder representatives and members of the general public (see, for example, the “Correspondence” web page at http://www.food.gov.uk/foodindustry/Consultations). The resultant risk communications narrative has emphasized the case for exercising precaution in the face of uncertainties, and the need to provide consumers with reassurances.

In this latest phase, the FSA Board has been critical of standards and regulatory enforcement in some EU Member States because, on a few occasions, residual spinal cord material has been present in imported beef (FSA, undated). The FSA has argued that, because regulations are tighter in the United Kingdom than in some other EU Member States, and because enforcement is more consistent and reliable, British beef is probably safer (in respect to BSE) than beef from other EU countries. A nationalistic dimension remains an ingredient, however, in the BSE risk communication strategies of all the EU Member States.

**Germany**
The German authorities’ risk communication strategies for BSE can be divided into four phases. The first phase began in the late 1980s and culminated in the crisis of March 1996. The overall narrative during that period was that BSE was not a domestic challenge and that the German Government had adopted a precautionary and successful policy of excluding BSE-contaminated material from the country. During the second phase, which ended in November 2000, the German Government actively sought to reassure domestic consumers, insisting that Germany was BSE-free. The third phase began in November 2000 when the first genuine German BSE case was detected, triggering confusion and a major crisis in Germany. The fourth phase began in January 2001, after the Agriculture Ministry was replaced by a new Ministry for Consumer Protection, Food and Agriculture, and collective responsibility for the crisis was taken by politicians, scientists, and producers of feed and food.

**Phase I: someone else’s problem**
The first phase of the official BSE risk communication strategy in Germany began in the late 1980s and ended in
March 1996. Over that period BSE was seen by most federal German officials and ministers as an external problem deriving from the United Kingdom, and not as a domestic challenge. The clash of priorities between promoting domestic industrial interests and protecting public health was consequently less stark than in the United Kingdom. German policy-making has traditionally been a fairly opaque process, so while it has been possible to identify the BSE risk communication strategy it has not been possible to detail the underlying process through which that policy was negotiated within and between the agriculture and health ministries.

The evidence suggests that officials in the German health ministry were never persuaded by British reassurances that BSE posed no threat to human health. A consensus emerged around a narrative that argued firstly that BSE might potentially pose a risk to human health, but secondly that BSE was not present in German herds, and thirdly that all necessary measures should be taken to exclude cattle, beef and any bovine materials that could introduce the BSE pathogen into Germany (Dressel, 2002). That narrative was widely welcomed by German farmers, the meat industry and by some of the consumer groups. It was, however, always vulnerable to the emergence of evidence of BSE in Germany.

By the end of Phase I, in the spring of 1996, German policy-makers therefore came to think of themselves as having adopted a pre-eminently precautionary, and successful, policy regime. When the crisis of March 1996 erupted, the official German policy of precaution was widely seen as having been fully vindicated. The discreet response of the German expert advisers on public health, however, was to argue that it was then more important than ever to ensure that BSE was absent from, and excluded from, Germany (interview, German official). The narrative adopted by the German Agriculture Ministry was to emphasize the steps that were being taken to exclude BSE from Germany, but to discount arguments calling for active surveillance. In other words, policy-makers discouraged scientists from actively trying to find BSE within Germany’s domestic herd.

**Phase II: reassurance**

Phase II of Germany’s risk communication strategy began as a response to the key event of the crisis of 20
March 1996. On the one hand, Germany’s precautionary approach seemed to have been vindicated, but on the other hand the demand for beef in Germany fell abruptly. A concern with agricultural economics became at least as influential in the Federal Government as the protection of public health. The German Government, strongly supported by the German beef industry, sought to reassure domestic consumers, both by issuing reassuring statements and by setting tighter regulations. That expressed itself in the dominance of the narrative affirming that Germany was BSE-free.

The first animal to succumb to BSE in Germany after 20 March 1996 was diagnosed in early 1997, but the provenance of that animal was difficult to establish. Although some alleged that it had been born in Germany, it became eventually known that it was of Swiss origin. The Federal Government responded to that single particular BSE case by ordering the slaughter of over 5000 imported cattle, reinforcing the narrative that BSE was an alien pathogen. In February 1997 Germany, together with several other EU countries, applied for the status of being “BSE-free”. The Commission’s Scientific Veterinary Committee did not support that application because too few data were available to support the classification (Süddeutsche Zeitung, 1997a).

There was also some domestic criticism of German BSE policy during this phase. For example, in January 1997, the Minister of Environment and Forestry of the Rhineland-Palatinate, Klaudia Martini (of the Green Party), accused the Federal Ministers for Agriculture and Health of being too slow in responding to the threat of BSE (Ministry for the Environment and Forestry of Rhineland-Palatinate, 1997) whilst in the same month the Bavarian Consumer Association stated that eating beef sausages might result in a risk to humans (Süddeutsche Zeitung, 1997b).

Important differences between the German Länder also emerged. As noted in the previous chapter, in North Rhine-Westphalia the Green Party’s agriculture minister argued that it was important to test asymptomatic German cattle with the then newly available Prionics test, even though the test had not been fully “validated” at that time (interview, North Rhine-Westphalia official).
Despite finding no evidence of BSE, the official narrative was not that North Rhine-Westphalia had no BSE, as the Federal Government and some other Länder insisted, but that it was only possible to say that the incidence of BSE was lower than 1:5000. The policy was described by an interviewee:

We have deliberately distanced ourselves from [reassuring] statements and have said: ‘There is always a risk, but we don’t know for sure how big it is, but we try hard to minimize it’. But we’ve never tried to lead somebody to believe that there is a safety that cannot exist in reality. That was quite decisive, I think, and that contributed to credibility at the end.

(Interview, North Rhine-Westphalia politician).

**Phase III: confusion**

The second phase of Germany’s BSE risk communication strategy ended (abruptly) in November 2000 when the first unambiguously German case of BSE was identified and officially acknowledged. It was this disclosure, and similar revelations in France, Italy and Spain that triggered a major continental crisis, and necessitated the introduction of a new BSE risk communication strategy. The ramifications of that discovery were complicated by the fact that the German Government had recently been especially emphatic in its insistence that Germany was BSE-free.

The political controversy in Germany arose not so much from the kinds of concealment and sedation that had taken place in the United Kingdom, but from a dispute about the precautions that needed to be taken to prevent the further spread of BSE. In mid-November 2000, after the results of rapid tests had started to reveal previously hidden cases of BSE in German cattle, the Agriculture Minister (Karl-Heinz Funke, himself a farmer) delivered a speech to the cabinet of Chancellor Schroeder, insisting that no further restrictions should be imposed on the use of meat and bone meal in animal foodstuffs before “the full facts were known”, and opposing a ban on the use of meat and bone meal in feedstuffs intended for pigs and poultry (Anon, 2001). Veterinary and political problems subsequently arose because evidence emerged, in Germany as it had previously in the United Kingdom, showing that farmers were not always scrupulously careful about which species received which feedstuff; cross-contamination could and did occur during production, distribution and storage of feedstuffs. Furthermore, because the labelling procedure for feed producers had been changed, it was impossible for farmers to identify whether protein added to the feed was of an animal or plant origin (such as soya bean). Even though Funke could claim that 16 000 tests for BSE infectivity in German cattle had all proved negative (the vast majority of which were conducted in North Rhine-Westphalia), his position was undermined one week later when BSE was found in an animal exported to Portugal from Germany. The German Government responded by proposing to
ban meat and bone meal from all animal feeds, and extending cattle testing.

Funke’s position was weakened further when the European Commissioner for Health and Consumer Protection, David Byrne, said at the end of November 2000 that Germany had been too complacent about the risks of BSE, especially when German ministers had consistently opposed his plan for a complete ban on all use of meat and bone meal (European Commission, 2000d). In mid-January 2001, as Germany’s BSE crisis deepened and domestic demand for beef slumped, both Funke and Health Minister Andrea Fischer — who resigned in order to force Funke’s departure — departed from the German Federal Government.

Prior to that crisis, German federal officials responsible for BSE policy had not seen public attitudes to BSE or the safety of the beef supply as problematic, or particularly worthy of concern or surveillance (see Chapter 8). Similarly, officials had not seen media coverage of BSE as having been particularly problematic. However, since November 2000, ministers, senior officials, farmers and the food industry have seen both as intensely problematic. This crisis was widely interpreted as a crisis of credibility and public trust in the risk assessment and risk management abilities of official German risk regulation institutions (see, for example, Böschen et al., 2002; Dressel, 2002).

Subsequently, the attitudes and beliefs of the German public towards policy-makers and food safety has become a matter of active concern to the new Ministry for Consumer Protection. The crisis led not only to substantial reorganization and restructuring of various political institutions, but also kicked off a continuing public debate about farming practices, consumption issues, and the application of the precautionary principle in questions of risk and scientific ignorance.

**Phase IV: collective responsibility**

The fourth phase of Germany’s official risk communication strategy began when the Agriculture Ministry was abolished in January 2001 and replaced by the Bundesministerium für Verbraucherschutz, Ernährung, und Landwirtschaft (Ministry for Consumer Protection, Food and Agriculture) under the stewardship of Minister Renate Künast from the Green Party. Künast defined the new top priority of the new ministry as being consumer safety (Künast, 2001).

Künast and her fellow ministers have repeatedly referred to what they term “the magic hexagon”. That hexagon is defined as a set of six policy actors, namely consumers, farmers, the animal feed industry, the food industry, the retail sector and policy-makers (Künast, 2001). The new narrative asserts that these six groups are collectively cooperating in the creation of a new form of consumer-oriented quality-based agricultural and food system. It will reconcile the long-term interests of all those groups of actors, and provide a long-term, sustainable, safe food supply and agricultural economy. It is striking how similar this narrative is to that emerging from the European Commission (in relation to the European Food Safety Authority), the British Government’s Food Standards Agency and the French Government’s AFSSA.
There are a few *prima facie* indicators that public confidence in the safety of the German food supply may be improving, but it would be premature to try to evaluate the consequences of the adoption of this narrative. An assertion that German beef is entirely safe or free from BSE is, however, noticeably absent from this narrative. A majority of German experts on TSEs and public health anticipate, however, that eventually cases of vCJD will emerge in Germany, and it is difficult to predict the impact that such news might have [interviews, several German scientists and officials]. Policy-relevant scientific uncertainties are being acknowledged to a greater extent than hitherto, but it is still not always clear how policy-makers are coping with those uncertainties.

**Italy**

The Italian authorities’ risk communication strategies for BSE can be divided into three phases. The first phase began in the late 1980s and culminated in the crisis of March 1996. The second phase began in response to that crisis. Phase III occurred once the result of active surveillance and data from a new set of rapid tests began to reveal in late 2000 a hitherto unacknowledged epidemic of BSE in cattle.

**Phase I: keeping Italy BSE-free**

As described in Chapter 2, after BSE first emerged in the United Kingdom, regulatory restrictions to reduce the risk from BSE were introduced by the Italian Government as European directives were adopted, but the disease was not considered by the Italian Government to represent a public health hazard in Italy. It was seen as a British veterinary problem. Italian policy therefore was to try to exclude British cattle and feedstuffs containing any meat and bone meal. At that stage, the official Italian BSE risk communication narrative asserted that BSE was a British problem, and that enough was known about BSE, and enough was being done about BSE, to ensure that Italians were not at risk from the disease. That narrative was transmitted to the Italian public by the Italian media, and it was effectively uncontested — at least in public. Some scientific and medical experts in the public sector and private practice were unconvinced, but they tended to keep their doubts out of public debates.

Although, in the early 1990s, the Italian Government began constructing an institutional framework to try to manage the risks posed by BSE, it did not engage in extensive risk communication about BSE with the Italian public or with key agricultural and food industry stakeholders. The assumption in official circles, however, was that it would be premature to assume that BSE posed no risks to public health, and therefore that it was important to try to exclude BSE-contaminated bovine products from Italy. The public narrative emphasized the steps being taken to keep Italy BSE-free rather than discussing the risks that might be posed if BSE were to reach Italy.

When the two first cases of BSE in Italy were diagnosed in 1994, in animals that had been imported from the United Kingdom, that episode did not provoke much public debate or concern. The disclosure did not have a significant impact on the sale of beef in Italy, and the Government’s risk communication strategy of empha-
Evolution and implications

sizing that BSE was an alien problem that had to be, and was being, excluded remained uncontested.

• Phase II: reassurance
The announcement on 20 March 1996 of a probable link between the consumption of BSE-contaminated foodstuffs and the occurrence of a new variant of CJD provoked a significant social, political, economic and agricultural crisis in Italy. Sales of beef in Italy fell quite sharply and media coverage reinforced consumer concerns. Some television programmes even suggested that the anticipated epidemic of vCJD could be even more serious than that posed by AIDS. Some leading Italian scientific experts were so uncomfortable with the approach adopted by parts of the Italian media that they refused to appear on television, and restricted themselves to newspaper interviews and to contributions to professional conferences. The 1996 BSE crisis was represented as a challenge from outside Italy. To cope with that crisis, however, the Italian Government had to change its risk communication strategy and its regulatory regime.

The crisis persuaded the Italian Ministry of Health to initiate a marginally more open and inclusive debate about how to respond to the policy challenge of BSE — at least, there was a marginal shift in official rhetoric although this was not entirely matched in practice. A wider range of scientific and public health researchers and institutions were involved than had been the case before March 1996. Prior to that date, the Italian Government’s attitude towards consumer groups was based on the view that they had no significant role to play in regulatory deliberations on BSE; in 1997, that approach was modified by the recognition, at least in principle, that consumer organizations might have a legitimate contribution to make to policy deliberations.

By the end of 1998 the Italian Government had strengthened its regulatory structure with which to manage the risks posed by BSE, and articulated a narrative insisting that Italy remained BSE-free. Policy officials and expert scientific advisers on BSE in Italy between March 1996 and November 2000 adopted, in practice, a predominantly unidirectional risk communication strategy, with a reassuring nationalistic narrative. They saw little need for more public dialogue on BSE policy-making with key industrial stakeholders public health or consumer groups.

The crisis of March 1996 initially had a strong impact in Italy. The Italian media gave great prominence to the stories about BSE and sales of beef fell sharply (see Chapter 6). By the end of the summer of 1996, the crisis had subsided and media attention had rapidly diminished. The campaign by the Italian Government to reassure the public that BSE was being kept out of Italy, and that beef on sale in Italy was safe, appeared to have been successful until November 2000 when the situation changed abruptly, once again.

• Phase III: confusion and contradiction
The discovery of cases of BSE in cattle in France and Germany, and the detection of the cases of BSE in Italian animals starting in January 2001, created what might be
described as “a wave of panic”. Media coverage of BSE rose rapidly, and much of it was focused on the alleged shortcomings of the Italian policy-making and enforcement systems. During the second half of November 2000, beef purchases fell by almost 36% and remained at that level until mid-December. At the end of January 2001, sales of beef in Italy were 60–65% down on the levels seen one year earlier (ISMEA, 2001).

During the post-November 2000 BSE crisis, the Italian Ministry of Agriculture frequently joined in debates on BSE policy with the Ministry of Health, and numerous tensions between the two ministries emerged. That occurred partly because the ministers had different political affiliations but also because they separately developed conflicting opinions about the risks that BSE posed. The Minister of Health, Umberto Veronesi, was not a professional politician but a well known oncologist who had only recently assumed political office. Several times during that crisis he argued publicly that worries about the threat to public health were greatly exaggerated and were giving rise to pointless alarm among consumers. The Minister of Agriculture, Pecoraro Scanio, on the other hand, was a professional politician and member of the Green Party. He repeatedly took the side of consumers, claiming that “mad cow disease” had extremely worrying implications for public health. The contrast, in that respect, between Italy on the one hand and Germany and the United Kingdom on the other is quite striking.

In order to remedy the consequences of having the ministers of health and of agriculture openly contradicting each other in public about the risks that BSE might pose, in mid-December 2000 the Prime Minister appointed an Extraordinary Commissioner for BSE in the person of Senator Alborghetti (see Chapter 8). His appointment was not, however, sufficient to ensure that the Italian Government spoke with one voice on the risks posed by BSE. A general election was rapidly approaching and the ministers were members of competing political parties, so unanimity was hard to achieve.

Many Italian policy officials have argued that responsibility for communicating about the risks of BSE should have been given exclusively to the expert scientific advisers and to top officials at the Ministry of Health (interviews, Ministry of Health Officials). In practice, that did not happen. The view of those officials and advisers is that risk communication should furnish the general public with prudent and responsible information and that information should flow in only one direction, from the technical-bureaucratic apparatus to the public.

They adopted moreover a model of public opinion that represented the Italian public as essentially irrational and easy prey to irresponsible elements of the media. Those officials appear to have assumed that it was always vital not to alarm the public, even if that meant keeping information out of the public domain, or disclosing it as cautiously as possible. While the expert scientific advisers often made it clear to ministry officials that they were not certain that BSE posed no risk to Italian consumers (interviews, Italian scientists), the narrative...
that the Ministry had been disseminating had asserted that Italy was BSE-free and that therefore beef in Italy was entirely safe.

From the point of view of policy-makers in the health ministry, the post-November 2000 crisis was manufactured by irresponsible elements of the media [interview, Ministry of Health official]. Policy-makers argued that the media were primarily interested in bad news, and that they tended to create panic without a sound scientific basis. The media, they alleged, were intent on boosting their audiences and circulation by irresponsibly sensationalizing the issues rather than by providing serious information.

Government scientific advisers tended rather to emphasize the shortcomings of policy enforcement on the part of local authorities, and complacency on the part of national authorities about the use of meat and bone meal in animal feedstuffs. Scientists working for official government bodies were also very critical of what they saw as attempts to restrict their freedom of expression, especially when they were banned from talking to journalists in early 2001 [interview, Italian scientist]. Unlike the ministry officials, government scientists maintained that the public should be treated like responsible adults, not as irrational children. They argued that the public should be properly informed without the truth being varnished, and that they should be told that there were no absolute safeguards against BSE. The measures taken by the Government should be explained to them, and they should not be fobbed off with reassurances and rash statements that the available evidence could not sustain.

Although criticisms of sensationalism on the part of the press and television may not have been entirely unwarranted, they indicate some naivety and complacency on the part of some key public officials about contemporary news media. Officials appear to have just followed the agenda set by the media — denying stories in the press, accusing journalists of distorting the facts, blaming them for emphasizing emotional aspects of the problem — rather than being able to articulate an agenda of their own [interviews, various officials]. Officials in the health and agriculture ministries were, following the discovery of BSE in Italy in January 2001, unable to cope effectively with the contemporary formats of mass communication. They were disconcerted by talk shows, round tables and sound-bite interviews. They wanted and expected the media to be deferential and only to present them as reliable and authoritative, and give them all the time they needed for what they took to be calm and rational explanations. The extraordinary commissioner for BSE acknowledged that the public officials’ scant familiarity with the media may have seriously hampered risk management and communication [interview, BSE Commissioner].

When the policy-makers became aware of their inability to handle the media they concluded that it was impossible to communicate their view of the risk of BSE. Rather than intervening actively, they preferred to wait for the issue to disappear from the front pages of the newspapers and from prime-time television. When top-down risk communication failed, they failed to identify the need for open dialogue with consumers and social and economic stakeholders. In the words of a ministry offi-
of public risk communication strategies on BSE

official, “It’s our job to produce health, not to read opinion polls” (interview, Ministry of Health official). The beliefs, attitudes and aspirations of the Italian public were considered largely irrelevant to decisions on BSE policy. Officials thought that it was necessary to come to terms with the concerns expressed by the public and the media, but to do so only ex post, as a follow-up once policy decisions had been taken. The decisions were not themselves influenced by those concerns.

While policy officials were substantially indifferent towards public opinion, they were evidently preoccupied with the domestic economic consequences of BSE. The interests of the large agro-food companies, cattle farmers and animal feed producers were well represented, not only at the Agriculture Ministry but also at the Ministry of Health. As a Health Ministry official explained, those interests influenced decisions concerning BSE:

We have always tried to ensure the safety of consumers, but when deciding between two options we have always chosen the one that did least damage to the economy. We’d be crazy to do otherwise. When you choose, you evaluate these things as well, and decisions on health matters always have positive or negative consequences for the economy.

(interview, Ministry of Health official).

Finland

The phase structure of the Government of Finland’s BSE risk communication strategy can be divided into three parts. Phase I evolved slowly from the first emergence of BSE in the United Kingdom until the end of the 20th century. The overall narrative during that period was that BSE was predominantly a British problem, but that the Government of Finland knew enough about the possible risk of BSE, and had taken sufficient steps to exclude BSE-contaminated material from Finland, to ensure that beef sold in Finland was safe.

This phase of quiet confidence had already started to crack in the autumn of 2000, when new BSE cases were found in France and new EU requirements concerning slaughtering practices and feed quality were put in place. Nonetheless, the strategy of quiet confidence that there was “no domestic problem” lasted until early 2001, when official rhetoric came to acknowledge the possibility of a minor risk and recognize the necessity of doing everything, including testing more animals for TSEs, to ensure food safety in the country.

The third phase started when the first case of BSE was detected in late 2001. This changed the message into one that emphasized that the finding of the first case proved that Finnish surveillance was effective and that risk was still very low.

Phase I: quiet confidence

Until it joined the EEA in 1994 and the EU in 1995, Finland’s policy on BSE was based on banning both the importation of cattle from the United Kingdom and the importation of meat and bone meal for feeding to ruminants. Those measures were represented in Finland as
prudent and sufficient. Finnish expert advisers and public policy-makers never assumed that BSE would be innocuous. Policy was always predicated on the assumption that BSE was a risk to veterinary health and might be a risk to human health, and therefore (as far as possible) it should be kept out of Finland. The official narrative was that Finland was BSE-free and that eating beef in Finland was therefore safe, and that narrative passed uncontested. In spite of the recognition of BSE as a possible risk, the belief that BSE was not a Finnish concern was reflected in the lack of precautionary measures in the country for many years. As noted in Chapter 2, until 1995 it was lawful for farmers in Finland to use domestically produced ruminant protein in animal feed. Under those conditions, therefore, if BSE had entered Finland, it might have been amplified domestically through the closed loop of the food-chain. Until 2001, it remained lawful to feed ruminant proteins to non-ruminant farm animals and consequently cross-contamination may also have occurred. Those practices have subsequently been prohibited under EU rules. In 2001, when Finland implemented the European guidelines and initiated a programme of active surveillance using the Prionics Western Blot test, it negotiated an exception to the rule that applied in most other EU Member States, and was not obliged to screen all cattle slaughtered above the age of 30 months. At the beginning of 2000, the Finnish Government started testing meat from some 20 000 cattle, including all animals with neurological symptoms, all those slaughtered prematurely, and unexpected fatalities. The costs incurred in the process were officially deemed acceptable, but it was widely assumed amongst senior officials that they served only to reassure Finnish customers and were not required for veterinary purposes [Helsingin Sanomat, International Edition, 2000]. The study team’s interviews suggest that, within the different parts of the food safety policy-making system in Finland, information about BSE risk was always provided quite freely, and that active exchanges of ideas occurred. Senior officials in the MAF had frequent consultations with experts in the National Public Health Institute on human risk-related issues [interviews, MAF officials]. Official information on BSE and its diagnosis was first given to veterinarians in 1988 when they were told to track cattle imported from the United Kingdom. In addition, a rabies epidemic in 1988–1989 triggered seminars and other information dissemination on the diagnosis of neurological veterinary pathology, including BSE. The MAF issued information leaflets on animal diseases to veterinarians and the media.

From the late 1980s until autumn 2000, the official approach to BSE risk communication in Finland was based on a fairly traditional top-down, expert-derived model. Policy-makers argued that consumers and their organizations could always have been involved in BSE policy discussions but in practice they never chose to do so. Policy-making was therefore routinely represented as science-based and precautionary, given some of the uncertainties. While BSE risk communication later became more active, it remained unidirectional. The Government of Finland discussed BSE policy with repre-
of public risk communication strategies on BSE

sentatives of farming and food industry interests, but until the first case of BSE emerged in Finland, little dialogue took place with representatives of consumer and public health groups.

Accountability and communication responsibilities for BSE and CJD were divided between the MAF and the Ministry of Social Affairs and Health (MSAH). The primary responsibility for information and communication strategies on CJD was assigned to the MSAH and the National Public Health Institute, while the upper levels of the MAF were given responsibility for BSE.

In 1997 the Finnish authorities established a coordinating group on risk communication, to bring together all the different organizations involved. The aim was to improve risk communication and ensure that, should a crisis arise, the authorities’ response would be coherent. In 2000, two seminars on risk communication and risk assessment were organized by those responsible for BSE surveillance of both animals and the human food supply. They brought together public health experts with representatives of the food industry and meat and dairy trade interests. The discussions included a study looking at how the different parties could and should respond in the event of a BSE case in Finland.

• Phase II: increased caution
Some increased caution began to be visible in Finnish public life in the early months of the new millennium. In March 2000, a written question was asked in Parliament regarding consumer protection and BSE. In particular, the questioner referred to possibly contaminated meat from Denmark, and asked why Finland had not joined the other Nordic countries in measures to protect consumers against this possible risk [Räsänen, 2000]. Another cause for increased attention was the fact that Finnish surveillance measures in slaughterhouses had received critical comments in a European Commission FVO report [European Commission, 2000b]. The report queried whether surveillance measures had been appropriately understood in municipalities and farms, suggested that the efficiency of the monitoring programme in slaughterhouses was being diluted, and found that during 1998 and 1999 only the Commission’s minimum required samples were taken.

The authorities’ response to the FVO report, however, highlighted mostly that the Commission’s overall assessment was excellent [see, for example, Helsingin Sanomat, 2000]. Nonetheless, in response to the FVO report, a leaflet on BSE was reprinted in 2000 and sent to all cattle farmers, and more information was also sent to veterinarians [European Commission, 2000c].

In the autumn of 2000, rising numbers of BSE cases in continental Europe and growing demands for EU safeguards prompted energetic discussion in Finland. With the increased number of ruminants to be tested by the beginning of the year 2001, official communications started to be more open about the risks of finding some BSE cases in the country. This more cautious line may also have been prompted by criticism raised over the previous approach, including a statement by the parlia-
mentary opposition leader that the Government had been understating the risks of BSE in Finland. The criticism, presented in an editorial of the Centre Party’s journal, stated:

... the way in which the Minister of Agriculture has emphasized the costs of the testing of the animals and understated the problem has been wrong; in addition in Finland BSE tests need to be done extensively and reliably. Costs are not a reason to lower quality or safety of food. In the context of public health policies and national economy the costs of testing are bearable.

(Jäätteenmäki, 2001).

The importance of the Centre Party’s statements and its influence on official policies is difficult to assess. However, as the Centre Party has always been one of the three largest national parties [with the Social Democrats and Conservatives] it cannot be ignored. Furthermore, as it is the main party in most rural areas and has broad support amongst farmers, the relevance of its views cannot be ignored in the policy process of BSE communication at national level.

Further parliamentary questions related to BSE were asked concerning issues such as the occupational safety of persons carrying out BSE testing, the use of gelatin in foodstuffs, and “BSE hysteria” in general (Vistbacka, 2000; Aittoniemi, 2001; Syväriinen, 2001; Tiura, 2001). However, as the Minister of Agriculture and Forestry, Kalevi Hemila, made clear in a report to Parliament in late January 2001, the government line was still one of implementing minimal required procedures, although there was more emphasis on the importance of maintaining trust (Hemila, 2001).

In February 2001, a possible case of BSE was provisionally identified, but subsequent histopathological tests on that animal were all negative. This appears to have increased the authorities’ awareness that a BSE case might eventually be found in Finland.

• Phase III: reassurance
On 7 December 2001, the Ministry of Agriculture and Forestry announced Finland’s first (and so far only) case of BSE. The disease was detected in a dairy cow born in Finland in 1995. No meat or bone meal had reportedly been used in that herd for more than 20 years. No evidence of BSE was found in any of the other animals in that herd. The Finnish authorities remain uncertain about how that animal came to be infected. Officially, the prime suspect for the source of infection remains contaminated fat in milk-replacer feeds used to feed calves.

The role of contaminated fat and the possibility that use of animal fat in feeding calves (so far, a permissible practice) was a problem that was also debated. At the time of the first BSE case the Finnish authorities were reported to have been aware of the concerns in Denmark about the practice but to have considered them safe (Helsingin Sanomat, 2001; YLE, 2001).
of public risk communication strategies on BSE

Although a report emerged on 24 December 2001 indicating that a second animal was suspected of having BSE, the results of subsequent tests contradicted that diagnosis (Meatnews, 2001). Since 7 December 2001, the authorities in Finland have had to further modify their risk communication strategy in favour of one that is somewhat more cautious. The fact that the BSE case was found was argued to show that the safeguards in place were, indeed, working. This message was voiced strongly by the food industry representatives, but also articulated clearly by the MAF representatives. According to Jaana Husu-Kallio, the head of the MAF’s veterinary and foodstuffs section and the person with overall responsibility for BSE communication, the finding of the first case of BSE actually supported the view that surveillance had been effective (Helsingin Sanomat, 2001). The more recent narrative has avoided assertions that all possible risks of BSE have been eliminated; instead it has focused on arguing that all statutory and practical measures are being taken and that if there is a residual risk it is extremely slight, and diminishing.

The identification of more BSE cases in other EU countries and the one case of BSE in Finland (the cause of which could not readily be explained) necessitated a shift in risk communication strategy. The new strategy changed from one of emphasizing that Finnish meat was safe and that EU measures were unnecessary to one of emphasizing that everything necessary was being done to ensure that meat remained safe.

This strategy appears to have been successful. Compared to other countries, Finnish demand for beef has remained stable since the first BSE case in December 2001, suggesting high levels of consumer confidence in domestic meat supplies (Finfood, 2001; Finfood, 2002; MAF, 2002). Another indicator of the success of Finnish BSE communications — as perceived within the country — can be seen in the awarding of two prizes by national associations in the course of 2002. The first was the annual prize of the Finnish Association of Communicators, awarded for carefully planned and effective communication efforts, which lauded the Government’s communications on the issue as “open and clear” (Finnish Association of Communications Professionals, 2002). The second was awarded by the national Consumer Association to the abovementioned official, Jaana Husu-Kallio, in recognition of how consumer and citizen viewpoints were reflected in official communications on food and veterinary matters [including the first BSE case], and these communications’ rapidity and openness. The Consumer Association judged that her work had enhanced consumer influence, and that consumers could continue to put their trust in food quality in Finland (Finnish Consumers’ Association 2001).


However, in spite of the awards and apparent satisfaction amongst some media and consumer representatives, it is difficult to say whether consumers’ views were really addressed better than in other European countries. While some communications practices in Finland were different to those in other countries, it seems unlikely that the content of the messages per se were more influenced by consumer viewpoints or that communications practices were more geared towards taking consumer or citizen opinions into account as a starting point. To the study team’s knowledge, no analysis of consumer or citizen views was ever carried out as part of the communication process before the crisis.

In short, it is difficult to claim that the success of Finnish communications on BSE was due to better awareness of consumer and citizen viewpoints. Rather, it may represent (a) the relatively broader trust that Finns have in both the honesty and the accountability of those in charge, and (b) the fact that the first case of BSE in Finland occurred later than in other countries and after the EU regulations had been implemented.

**Conclusions**

The evidence from the comparative study of the evolution of four national BSE risk communication strategies strongly suggests the following.

- All jurisdictions, at almost all stages in the evolution of their risk communication strategy, have tried to use concerns about BSE to promote the reputation of domestic beef supplies and to diminish confidence in foreign supplies.

- Public policy-makers have routinely represented risk communication as if it were a purely tertiary activity. However, the study team’s research shows that, in practice, risk communication considerations have often played a far more fundamental, but unacknowledged, role in BSE policy-making. To the extent that an aspiration to reassure consumers about the safety of beef has been a dominant concern of public policy-makers responsible for BSE, risk communication policy has been a primary or a secondary consideration rather than a tertiary one.

- Risk communication practices in most jurisdictions have sometimes been less than frank, and have misrepresented and/or concealed the objectives of policy and oversimplified and exaggerated the reliability of the available knowledge and the rationality of their actions.

- Public policy-makers have been operating with distinctive models of the beliefs, attitudes and wants of their citizens, but those models have had virtually no empirical support whatsoever, and have often been unrealistic. Furthermore, governments have seen public opinion as an object of policy, and as a problem that may need to be managed, rather than as a primary input to policy (as shown amply in Chapter 8). Risk communication strategies have therefore typically been unidirectional and top-down with little or no effort to engage in reciprocal communication activities.

- The risk communication strategies of all four countries ran into unanticipated difficulties when evidence emerged showing that they had been premised on false assumptions, both about science and about public beliefs and attitudes. Further difficulties occurred
because it became evident that the authorities of all jurisdictions were at least as concerned to reassure consumers (so as to maintain stability in agricultural markets) as they had been to protect public health.

In the United Kingdom, at several stages of the BSE saga, official risk communication messages suggested that public authorities had a secure scientific understanding of the putative risks of BSE and that such risks were zero, or virtually zero. British policy-makers also represented science as the exclusive determining factor in the decision-making process. The effect of adopting that strategy was that it allowed British ministers and officials to conceal their policy objectives and their trade-offs between risks, costs and benefits, and to hide behind a cloak of “scientificity”. German policy-makers never asserted full certainty with respect to the risks posed by BSE and British beef, but they did assert that German beef was perfectly safe. Italian and Finnish policy-makers insisted that BSE was a “foreign” problem and that BSE was being kept out of their jurisdictions, and that beef on sale in those countries was entirely safe.

The experiences described in this chapter suggest that risk communication strategies that assert full certainty when significant uncertainties remain are unlikely to be sustainable in the long run. Risk communication strategies that assert risks to be zero, or virtually zero, are also unlikely to be sustainable in the long run. Any risk communication strategy that combines those two shortcomings is likely to become especially problematic, particularly as and when new evidence emerges.

The British Government’s pre-March 1996 risk communication narrative backfired dramatically after evidence emerged showing that such claims had been premised on false assumptions about both the science of BSE and policy-making processes. Trust, on the part both of domestic consumers and of international consumers, in British regulatory institutions and their expert advisers evaporated. Prior to March 1996 those risk communication practices had also had an adverse impact on the substance of policy, by diminishing the scope for policy-makers to appreciate the need to make judgements about the extent to which precaution was appropriate, and the scope for exercising precaution. Having started with a risk communication strategy of consumer reassurance that asserted that British beef was safe, policy-makers were inhibited from learning about the risks or responding to new evidence.

The reassuring, and nationalistic, risk communication narratives adopted by German and Italian policy-makers in the 1990s were also ruined by the discovery of cases of BSE in cattle in German and Italian animals in late 2000 and early 2001; these events were closely followed by dramatic and abrupt reductions in beef sales within those jurisdictions. In Germany it became evident that, despite the rhetoric about having a pre-eminently precautionary policy regime, agricultural policy-makers had been at least as preoccupied with promoting the interests of the cattle farmers and animal-feed producers as with protecting public health. In Italy, once the domestic crisis broke, the authorities were unable to provide a coherent or consistent message about the risks that BSE
posed in Italy, or to deal effectively with the media. Consumers therefore drew the conclusion that they had not been, and were not being, properly informed about BSE.

The risk communication narrative adopted by Finnish policy-makers has proven to be more sustainable than in Germany, Italy or the United Kingdom (again, this is in a context of far fewer reported cases of BSE than in most other European countries). Although, like the German and Italian governments, the Finnish authorities had characterized domestic beef as reliably safe, the Finnish narrative began to shift well before the first domestic case was discovered in late 2001. At the beginning of that year, policy-makers began to emphasize the possibility of a risk from Finnish beef; once the first domestic case had been discovered, policy-makers then insisted that it demonstrated the effectiveness of Finnish safeguards. The fact that demand for beef in Finland did not follow the pattern in other jurisdictions may also represent a relatively high degree of public trust in Finnish policy institutions.

Of all the strategies examined, the approach adopted in North Rhine-Westphalia seems to have been the most robust and sustainable. The authorities of that Land acknowledged many of the scientific uncertainties, and adopted a more open rhetoric and practice than any of the other jurisdictions. North Rhine-Westphalia consequently initiated a programme of active surveillance for BSE at the earliest possible opportunity. The adoption of that strategy appears to have been exceptionally effective in maintaining public confidence in at least the relative effectiveness of their BSE policy.

In both Germany and the United Kingdom, following the creation of new food safety institutions in 2000 and 2001, respectively, risk communication strategies shifted significantly. The new institutions abandoned the traditional pretence that the science of BSE is secure or complete, or that the risks have been entirely eradicated. They have both also introduced a new emphasis on collective, consumer-orientated and precautionary decision-making and, in the United Kingdom at least, have been experimenting with innovative forms of reciprocal communication and deliberation. It will be fascinating to see how these initiatives will be refined in the longer term.

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of public risk communication strategies on BSE

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of public risk communication strategies on BSE


