

31st May 2010

To Prof. John Curtice, Chair, FSA Public Dialogue Steering Committee,

to steering group members, relevant officials and observers,

Dear John,

With considerable regret I have decided to resign from the steering group for the public dialogue. I have been weighing the pros and cons involved in this since our last meeting on Thursday 27th May. At that meeting Jeff Rooker's words to us in his role as Chair of FSA, thus *institutional* not personal words, were the final straw. They tipped what was before this an evolving and finely-balanced tension, between the possibility of our eventually being able to do something good and proper with the public money effectively at our disposal, or instead contributing by default to an abuse of public propriety, legitimacy and trust. This has always been a balance, but Rooker's words made me appreciate the depth and rigidity of the counter-forces we were up against, so just pushed me over the brink. As elaborated below, his stated perspective sweepingly contradicts the principles in the government's own *Sciencewise* guidelines, as well as much long-established social research in science and policy.

In my continual attempt to understand what kind of institutional culture of taken-for-granted commitments we are operating within, it is impossible indeed nonsensical to ignore such words. As you and others on the steering group know, I have always had reservations over some dimensions of this whole FSA initiative, the politics behind it and the culture of habits and expectations into which it comes, and I have explained these at relevant points in our development of this process since last November. I decided early on that I had an opportunity, indeed some responsibility, to try to reflect my understanding of what is or should be involved in such a public dialogue, by constructive involvement in it.

I thank you for having done your best to provide the appropriate space for such input all through, but in the end I have been forced to the reluctant conclusion that there are too many unaccountable forces, not all deliberate, working against a proper process, one which would show integrity and legitimacy from top to bottom, and which would therefore command respect whatever the specific outcomes might have been, and whomever's preferences might have been offended or affirmed. This in no way suggests that the integrity of your own commitment, nor indeed of any other members of the steering group, should be in question. That is not at issue for me. What is at issue, indeed what I have been forced to conclude is compromised, is the integrity of the very policy process in which we as the dialogue steering group had become a key component. I am not prepared by default to aid and abet this kind of systematic failure of institutional integrity in what is a crucial public arena, involving deep questions of science and public good.

I cannot here explain all of my reasons for resigning, and at some later stage I will document my full reasoning in a more analytical way; but you deserve at least an outline:

Impartial Dialogue? Impartial Policy? Let me begin with Rooker, the institutional voice of FSA as government agency in charge of the dialogue. At our Thursday 27th meeting, he said that “the public is anti-science”. (When I challenged this, he could only refer to tabloid “Frankenfood” etc headlines, as if these are ‘public attitudes’!). This is from the spokesperson and leader of the ‘accountable’ public policy body running what is claimed to be an impartial *public dialogue*! That would almost alone cause one to leave forthwith, and I have to say I was stunned by this statement. Not only does such an attitude destroy any aim or claim that the FSA’s dialogue can be impartial, it also contradicts the repeated statement made by senior officials, that the FSA has no policy position on GM, but is (also) impartial, and waiting to hear from that (“anti-science”, it seems!) public. On the question of FSA’s claim of its impartial no-policy stance on GM; once we start from this false conviction that ‘the public is anti-science’, we only have to add the related convictions – also repeated by Rooker at our meeting - that the GM issue is ‘a scientific issue’ and that FSA policy is determined only by sound science, for a pro-GM policy stance to be seen implicitly in FSA’s deep institutional culture, deriving from these very premises.

This is one reason why I have attempted all along to distinguish between policy as deliberate decision(s), and policy as *commitment*, deliberate or not. Those premises add up to a pro-GM policy without its being open, explicit, or reasoned. In being deeply pro-GM in everything but the explicit punch-line itself, this FSA position is effectively a state of institutional denial. This is all the more dogmatically entrenched for its being unrecognised by its own proponents. It is thus either plain dishonest, or it is scandalously unreflective upon, and evading accountability for, its own normatively weighted assumptions. I believe this adds up to a dishonest structural situation, whatever the honesty or otherwise of any individual involved. I also believe that this blind commitment renders even sincerely-meant attempts at public dialogue prone to meaningless public disorientation, abuse, and alienation which undermines public policy authority whichever particular way it might commit itself.

Framing: A further stance pronounced by Rooker goes to the heart of one of the key issues we have struggled with on the Steering Group. This was his assertion that (again, we have to take it, the FSA stance) the dialogue “is about GM” (his words) and also: “we just want to know what the public thinks about GM”. This directly contradicts:

- our own earlier steering group decisions;
- the *Sciencewise* public dialogue principles about framing;
- the Royal Society *Reaping the Benefits* (Nov 2009) food report (see eg p.151: “Assessment of benefits, risks, and uncertainties should be seen broadly, and include the wider impacts of new technologies and practices on economies and societies...dialogue should start with the problem which needs to be addressed, ie food security, rather than presupposing any particular solutions”
- my (and others’) statement at the outset, in October 2009 when I was approached by FSA officials asking me whether I would be involved in the steering group, that I would not participate if it is envisaged as a “GM or not” public dialogue. Reassurances at the time that this would not be the case now look moribund

Compromises and ambiguities have coursed right through our handling of this, and I am not complaining about that itself; but this GM-obsessed, narrow commitment from the very top of FSA only tells me that whatever the efforts we have made, and whatever we tell a dialogue-contractor, the signals from upstairs remain narrow and dogmatically narrow-minded. Furthermore with the contractor to which we reduced ourselves on Thursday May 27th (unless it refuses to accept a final condition we specified), I have no confidence – for reasons I gave at our meetings, but which I’m still not confident were understood by others in the steering group and round the table - that any wider definitions of the issues will be heard and respected, in an open-minded and genuinely impartial way. This is not just a question of whether *arguments and opinions* beyond pro-GM will be included in the dialogue. I am sure that they will, and that this will be documented – but that was never my point, nor my concern. This is that, even if wider positions *are* heard, if no one challenges the institutional dogma which afflicts FSA and it seems other government bodies, that the issues are scientific and the only perspective which can be properly used to assess these is (so-called) ‘sound science’, then these wider frameworks will be doomed to dismissal before they have even been properly heard, since some of them at least are saying that a (so-called) ‘sound science’ perspective cannot possibly accommodate, understand and assess some of the key issues over global food and its food-chains (including GM), and their resilience, sustainability and justice.

The issue was never just about what range of framings of the issue, and of different attitudinal positions, would be heard, though this has had to be argued through more than it should have needed. It is also, crucially, about how those wider framings, and those different positions, will be *dialogued with*. I have received no sign that this will even happen, but instead I have been told that policy officials and Ministers will consider them as they please, at their own convenience, with no accountable justifications or explanations or hearing of public and other stakeholder issues and concerns. Thus the ‘dialogue’ is at too much risk of becoming a combination of effective monologue, and extractive research activity. This will only act as yet another public mistrust generator, and all the fine words about taking the public into account in future policy will be meaningless .

It is worse than disappointing that good officials in such public institutions, as well as academics and others putting in our time (and our names) willingly for free, should have their honest efforts distorted systematically by this kind of unaccountable and dogmatic culture which remains obsessed with GM when there are wider and more diverse questions and options which need to be assessed and explored. Of course I know that the principles say that one should frame the issues according to public and other stakeholder concerns, but we know and have discussed that the contractor will always have to start from somewhere and thus be unavoidably suggestive to participants. These starting points have to be the global food security and sovereignty issues, from which UK dimensions cannot be isolated. Here the combination of the pressures to ‘science only’ and ‘GM focus’ (leaving aside the atrocious ‘public is anti-science’ dogma from more senior positions) will inevitably shape things in false, narrow and preordained directions.

Lack of accountability about dialogue’s relations with policy: Another of *Sciencewise’s* important principles for dialogue is that the relations with relevant policy processes should be clear. In this case at least, as some of the SG including me suggested, this meant the need for:

- a statement to be provided to the steering group, of salient government policy positions and their premises or justifying principles, not just about GM directly, but about areas affecting food and agricultural policy internationally, including eg regulation, trade, etc. One can see with my comments above on Rooker's definition of the public as anti-science, and GM as a scientific issue, why this needed to be clear-headed about salient assumptions and premises relating to GM, and not only directly about GM (and wider issues as emphasised, such as on alternatives to GM).
- in addition to substantive policy, a clear statement of the *process* elements of these relations, in other words that relevant government officials should be available at appropriate points in the dialogue, to respond to concerns and questions posed by public participants as well as other stakeholders ;
- this also required an explicit commitment to a wider range of policy officials and policy issues than only FSA, since the issues stretch well beyond this agency with its food safety brief;

None of these requirements have been met in my view, despite dogged efforts to achieve them on my part. It isn't good enough to say that we cannot presume to demand that government officials play the accountable dialoguer role, with public and other stakeholder dialoguers. If we cannot so demand - which might be realistic - then don't call the ensuing process a dialogue! Without such an interactive element of process-design, it isn't one, and all the procedural and methodological elaborations which may then be enacted, remain a confusion of floss and fudge.

In addition to this, the policy statement only arrived just before the interviews for the contractor, and although this was excused because of the election, it was originally requested (as the minutes show) at our first meeting in late November 2009, several months before an election was announced and *purdah* began. Not only this, but the statement was wholly inadequate in content even when it did eventually arrive so late, and did not meet the dialogue needs for such a policy statement. As just one example, its account of regulation was only about food, not agriculture, and was restricted to UK (and some food safety and consumer EU) policy. There was also no account whatever of salient research policies. At EU level, the conflicts and controversies over the partiality of EFSA, and other regulatory bodies (eg the universal dependency of such expert scientific committees on non-peer-reviewed, private corporate data under conditions of commercial confidentiality) were ignored, along with many other things likely to be important to public concerns.

Dialogue with...? Or Extractive Control of Publics? With respect to process dimensions, I attempted from around January 2010 (for example in my circulated paper dated 20th January) to persuade the SG and FSA as well as officials beyond FSA across government, that we needed a wider reference group of some such policy officials to be involved as accountable government actors who would respond accountably during the dialogue to the questions and concerns which came up – to be the government's actors in the process, not sitting above and beyond it. The response of 5th March from FSA's official on this, was that “the Government Officials Group which has representatives from DEFRA, BIS, Health & Safety Executive, DfiD, Cabinet Office and all the devolved countries ... will be responsible for disseminating findings from the dialogue across government and ensuring that future discussions and policy on GM take due account of the dialogue's findings”. This did not remotely meet the process

requests for an accountable and involved ‘dialoguer’ with the public which I and others had made, as I said in response to that FSA position when I received it. Nor again does it meet the government’s own (*Sciencewise*) principles. This is a stonewall against proper accountable process. If a “dialogue with the public” (as it has been insistently called) is to occur, then common sense dictates that it has to have an accountable partner with which to dialogue, and this has to be government in the form of the relevant departments and agencies. Stating anaemically that these will “take due account of” the dialogue findings, amounts to a failure of integrity in calling such a procedure a public dialogue (or even ‘dialogue with the public’). It only also underlines the point made by many inside and outside the SG, that this so-called public dialogue has been envisaged and planned from the start as an extractive exercise only, in eliciting public attitudes under particular conditions, then leaving the crucial process of control over their interpretation to a privileged combination of commercial contractors and government officials sitting protected from challenge above and beyond the (so-called) dialogue. If this extractive relationship is what is being performed, then this must be stated clearly at the outset, before recruitment, and with no false references to dialogue made. Yes, it was argued that we as the SG could intervene with the contractors so as to do this carefully and with integrity, but we have had no acceptance from FSA and others that they will put up officials as proper participants in the dialogue. This is therefore, effectively asking private contractors – and thence also ourselves as SG members - to stand in for absent refusenik policymakers. I am not willing to do this, nor to lend my name to such a lamentably confused and in effect (I do not mean, by intention) dishonest process. If it is an *extractive* process over which interpretation will be left unaccountably to officialdom and to dogmatic politicians like Rooker, as I believe that it has been relentlessly returning to, then it is contravening government *Sciencewise* principles on another aspect too.

Evaluation: In light of the dimensions outlined above which have caused me to resign, I finish by noting that the evaluation which the currently favoured contractor candidate is proposing to do, is most unlikely to take the learning from this exercise beyond existing inadequate understandings of public dialogue on such science-intensive but by no means solely, indeed not primarily, scientific issues. They are public issues involving science, not ‘scientific issues’, and this evaluator team showed little if any sign of understanding that, nor the issues and problems I have only indicated above. I did not think the contractor was appointable after we interviewed them on May 19th, and I duly voted against doing so at the ensuing commissioning group discussion. I assume the report a week later that this vote had been unanimous in favour of them was an honest mistake - now I hope corrected. My view remains the same, that we will not receive value for taxpayers’ money from evaluations such as this proposed, because it will not challenge conventional understandings of the deeper issues which policy has to learn how to address.

I joined this process because I felt there was a chance to help explore these deeper problems with relevant policy institutional actors; but I feel now, in the light of experience and reflection, that this was unduly optimistic. There is no understanding of these deeper institutional questions underlying such problems. I’m deeply dismayed by this, even though I don’t regret having tried my best, and I thank you and (ex)fellow SG members, and officials, for the collegial spirit of the work we did.

With sincere best wishes, and regrets,

Brian

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