

## **EFSA REPORT TO THE EUROPEAN PARLIAMENT ON THE IMPLEMENTATION OF ITS INDEPENDENCE POLICY 2007-2012**

### **1. Introduction**

The European Food Safety Authority (EFSA) was established in 2002 in the wake of the damaging food crises of the 1990s and early 2000s to provide independent scientific advice of the highest quality to Europe's risk managers. To restore public confidence in the European food safety system, the Founding Regulation<sup>1</sup> identified key operating principles which represent the organisation's core values: scientific excellence, independence, transparency and openness. Since its establishment, EFSA has put in place a range of initiatives to safeguard these core values and build trust in its work. It has done so against the backdrop of widespread public concerns in relation to the objectivity of scientific advice in general, fuelled by a number of well-known controversies in disparate fields of science including climate change. Food safety and indeed EFSA itself has not been excluded in this regard and, with no evidence of bias or lack of objectivity in its scientific outputs, critics of the Authority have instead tended to call into question the credibility of those involved in delivering its science.

EFSA has taken an approach of continuous improvement and rigorous implementation in relation to its policies and rules and, as described in more detail in section 3 of this report, this has culminated in the adoption of the *Policy on Independence and Scientific Decision Making Processes* (2011) and its implementing rules (2012), referred to hereafter as the new policy and rules. The new rules entered into force on the day of their signature (21 February 2012) for the selection and appointment procedures of the members of EFSA's Scientific Committee and eight Scientific Panels<sup>2</sup>; for all other individuals and processes concerned, the new rules enter into force as of 1 July 2012.

This report describes how EFSA has already begun to implement the new policy and presents the outcomes of the implementation of its predecessor, the 2007 Policy on Declarations of Interest<sup>3</sup>. It analyses previous criticisms and provides transparency in relation to the actions EFSA has taken to prevent conflicts of interest or breaches of trust (Annex 1).

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<sup>1</sup> Article 22 (7) of Regulation (EC) 178/2002.

<sup>2</sup> Scientific Panels on Animal Health and Welfare (AHAW), Biological Hazards (BIOHAZ), Contaminants in the Food Chain (CONTAM), Plant Health (PLH), Additives and Products or Substances used in Animal Feed (FEEDAP), Dietetic Products, Nutrition and Allergies (NDA), Genetically Modified Organisms (GMO) and Plant Protection Products and their Residues (PPR).

<sup>3</sup> EFSA Policy on Declarations of Interest, <http://www.efsa.europa.eu/en/keydocs/docs/doipolicy.pdf>.

## 2. Background to EFSA's independence

In the context of EFSA's Founding Regulation, independence is regarded both as independence from other EU institutions, agencies and bodies and as independence from vested interests in the food and feed sector, including economic ones. It is closely related to the organisation's other core values – scientific excellence, transparency and openness – and, while EFSA is committed to ensuring that all are effectively implemented, tensions can arise between these values in their practical implementation.

Unlike international counterparts such as the US Food and Drug Administration, EFSA currently relies heavily on external expertise from academia, research organisations and national food safety agencies to generate its scientific advice. Public-private partnerships are a well-established feature of European research funding and the ability to attract private sector funding is a key consideration for researchers. These partnerships facilitate the transfer of knowledge and technology from academia/research to industry and are therefore an important component of the innovation process. With its selection processes geared towards ensuring that Europe has access to the best available scientific expertise, it is therefore unsurprising that many of the scientists who contribute to EFSA have collaborated with food industry at some stage of their careers. As EFSA is obliged to ensure that its scientific advice is objective and unbiased, this places responsibility on experts to actively consider any professional or personal interests or affiliations that might influence their objectivity and on EFSA to ensure that its systems for managing interests are effective and rigorously implemented. It should be noted that members of EFSA Scientific Panels and Management Board are not EU public officials and have no employment contractual relationship with the Authority. With no comprehensive regulatory framework at the EU level in relation to ethics and integrity, EFSA has taken the lead in developing rules and procedures and in doing so has referenced the guidance provided by the OECD<sup>4</sup>.

## 3. Evolution of policies

While the independence of EFSA's scientific outputs is not solely dependent on implementing an effective declaration of interest system (see Section 5), the Authority has since inception provided guidance on declarations of interest in the Rules of Procedures of its various units and bodies. Its *Policy on Declarations of Interest (2007)* laid down specific provisions for identifying and handling conflicts of interest and was the extant policy during the time relevant to the majority of the criticisms raised. The 2007 policy included a three-year review commitment which culminated in the adoption of a new policy in December 2011<sup>5</sup> after an extensive consultation process with stakeholders and partner organisations. The new policy consolidates all the key elements

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<sup>4</sup> [http://www.oecd.org/document/46/0,3746,en\\_2649\\_34135\\_41879598\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/46/0,3746,en_2649_34135_41879598_1_1_1_1,00.html)

<sup>5</sup> Policy on Independence and Scientific Decision Making Processes (2011): <http://www.efsa.europa.eu/en/aboutefsa/keydocs.htm>.

of EFSA's scientific decision-making processes and governance related to independence such as the selection of experts, collection of scientific evidence, collegial expertise etc. It introduces a number of improvements including: the simplification and clarification of the rules on identifying and handling conflicts of interest; better information on how decisions on conflicts of interest are reached by outlining admissible and incompatible interests in a transparent manner; strengthening of procedures concerning breach of trust; and alignment of EFSA's definition of conflict of interest with OECD guidelines. It also introduced the initiative of opening selected Panel meetings to observers to enable them to witness the risk assessment process taking place, the pilot project of which is currently ongoing.

The implementing rules<sup>6</sup> of the new policy were published in March 2012; they allow EFSA to continue to access the best scientific expertise available while ensuring that contributing experts have clarity on their obligations. They provide clear definitions of interests and general principles for the declaration and assessment of interests for all individuals and organisations involved either in the delivery of its scientific work or in its governance (the forms used to declare annual and specific declarations of interest are presented in Annex 2). The new rules describe in detail the criteria EFSA uses for assessing interests and provide guidance on whether or not holding a particular interest would constitute a potential conflict of interest. Where a potential conflict of interest is identified, the consequences for a scientific expert or individual are made clear. For example, the new rules categorically exclude scientists employed by industry in areas relevant to EFSA's work from becoming a member of EFSA's Scientific Committee, Panels or Working Groups. Depending on the interests held, an expert might be allowed to become a member of a Scientific Panel but might not be eligible for consideration as Chair.

The rules are more inclusive of experts with interests in public organisations with a similar remit to EFSA (Food Safety Organisations, which are clearly defined) and facilitate in particular the involvement of scientists from national food safety agencies in EFSA's work. Scientists from organisations carrying out tasks within EFSA's mission and pursuing public interest objectives such as national food safety agencies, universities or international organisations have expertise that is valuable to the Authority's work. EFSA actively seeks to foster effective networks with these experts and the new rules are designed to reflect this. EFSA also makes explicit for the first time that the rules also apply to external organisations, such as contractors or grant beneficiaries, that contribute to EFSA's scientific work and clearly state that scientific experts cannot assess, review or rate their own work.

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<sup>6</sup>Decision of the Executive Director implementing EFSA's Policy on Independence and Scientific Decision-Making Processes regarding Declarations of Interests: <http://www.efsa.europa.eu/en/keydocs/docs/independencerules.pdf>.

## 4. Implementation

### *4.1 Renewal of Scientific Committee and Panels 2012*

The implementing rules of the 2011 policy have been applied to the renewal process of eight of EFSA's Scientific Panels and Scientific Committee. The full report of this process is available online<sup>7</sup> but herewith is a synopsis of the main points. Of the 871 experts who responded to the call for expressions of interest (published on 31 March 2011), 793 were deemed eligible. The evaluation of the scientific expertise of the eligible candidates was carried out in two separate phases, i.e. internally by EFSA scientific staff and externally by three independent evaluators specifically appointed for this exercise. The internal evaluation was carried out by two EFSA evaluators per Scientific Panel/Scientific Committee against the selection criteria listed in the published call. To assess whether the evaluation was done in a consistent manner, three independent external evaluators were selected by the Executive Director on the basis of their internationally-recognised scientific expertise, in-depth knowledge of EFSA and absence of involvement in EFSA's activities over the previous two years. In addition, the European Parliament, European Commission and EFSA Management Board were invited to nominate observers to the meetings of the External Experts with full access to all documentation and both the Commission and Management Board accepted the invitation.

An integral element of the selection process was the screening of the annual declarations of interest of the 447 highest ranked candidates to ensure that they had no conflict of interest. This resulted in the elimination of a number of candidates and in the establishment of a shortlist of 384 candidates. The shortlist was then shared on a confidential basis with the Advisory Forum for comment. The final selection<sup>8</sup> of the candidates proposed for nomination was made on the basis of: the overall result of the scoring exercise employed; the expertise required for the relevant Scientific Panels or for the Scientific Committee; knowledge level of the English language; nationality and gender; and the advice of the members of the Advisory Forum. As a result, 169 candidates were proposed for nomination to one of the eight Scientific Panels and the Scientific Committee and 211 were proposed for inclusion in the reserve list. The list was adopted by EFSA's Management Board on 15 March 2012.

As with previous renewal exercises, EFSA performed a number of final checks before the list could be publicly confirmed to ensure that (a) experts were still available and still willing to accept the role they had applied for and (b) they had acquired no new interests in the interim period since making their application that might conflict with their role as Panel members. This final check included a new assessment of declarations of interest and the identification of suitable replacement members where necessary. The final

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<sup>7</sup> <http://www.efsa.europa.eu/en/mb120315/docs/mb120315-ax7.pdf>.

<sup>8</sup>The selection procedure was "prior checked" by the European Data Protection Supervisor for compliance with the Data Protection Regulation 45/2001.

consolidated list of 167 experts was adopted by EFSA’s Management Board at its 14 June public meeting and, along with the experts’ declarations of interest, published on 18 June<sup>9</sup>. For all other individuals concerned (including EFSA staff members and experts not involved in the 2012 panel renewal) and processes, the decision enters into force on 1 July 2012. For the existing ANS and CEF Panels, the renewal cycles of which are not by law aligned with the other Panels, EFSA has begun to screen the declarations of interest of their members and to take actions to align them with the new policy and rules.

#### 4.2 Ongoing implementation of independence procedures

EFSA proactively manages declarations of interest, identifying potential sources of conflict and taking preventive actions where required. Its “triple protection” approach to declarations of interest was formalised in the 2007 Policy on Declaration of Interests: (i) a comprehensive annual declaration of interest; (ii) a specific declaration related to the agenda items that is completed in advance of a meeting; and (iii) a further request to participants for any oral declarations of interest at the start of a meeting. Interests are assessed by EFSA in relation to the activities that the expert is required to carry out, i.e. the mandate of the group and the role played by the expert therein, as illustrated in Fig. 1 below. Failure to understand this relationship has led on a number of occasions to confusion among those who look at interests in a more simplistic manner without reference to the actual tasks and role that an expert is asked to perform.

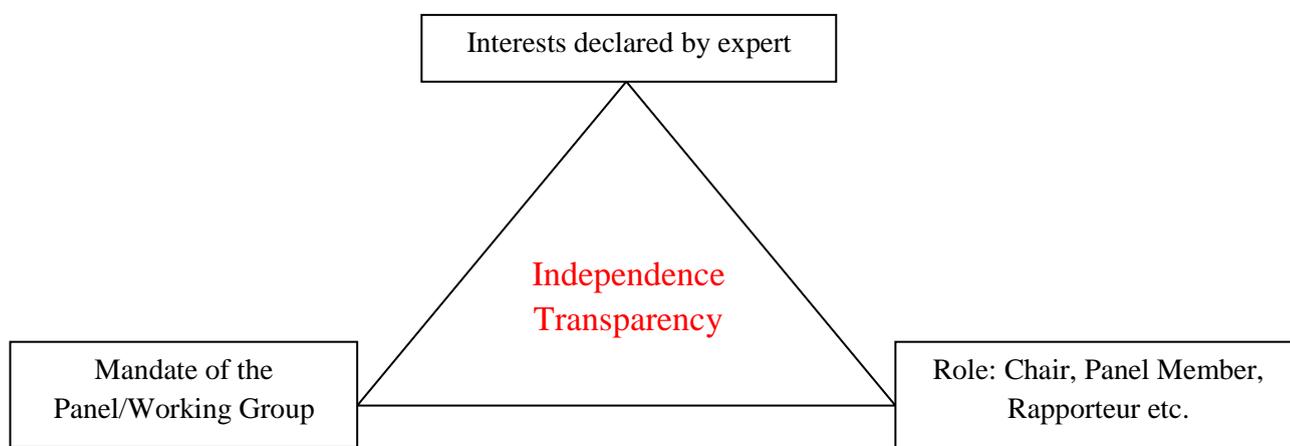


Fig. 1: Relationship between interests, mandate and role in EFSA’s assessment of declarations of interest.

As described in its Annual Activity Report (2011)<sup>10</sup>, EFSA screened 8526 declarations of interest, scrutinised 39,500 meeting agenda items, prevented 356 potential conflicts of interest and initiated two breach of trust procedures in that year. In both breach of trust

<sup>9</sup><http://www.efsa.europa.eu/en/mb120614/docs/mb120614-ax4.pdf>.

<sup>10</sup><http://www.efsa.europa.eu/en/corporate/doc/aar11.pdf>.

procedures, the experts involved resigned their membership immediately after the breach of trust procedure was initiated by EFSA. An audit of the scientific outputs with which they were associated by EFSA's Internal Audit Capacity revealed no evidence of bias. A summary of relevant data for 2011 and 2012 to date is presented in Table 1 below. While the data provided indicate the scale of these activities at EFSA, more reassuringly no evidence of industry bias has ever been identified in any of the Authority's scientific outputs. If anything, EFSA is more often accused of applying over-stringent criteria to the assessment of regulated products and claims generated by industry; such is the case for example in relation to health claims and food additives.

Table 1: Implementation of independence policy in 2011-2012

Year	DOIs Screened	Meeting agenda items scrutinised	Potential COIs prevented	Breach of trust procedures	Staff members leaving EFSA	Scientific outputs
2011	8526	39,500	356	2	Total: 25 Private sector: 3 <sup>†</sup> Restrictions: 1	658
2012*	3999	18,198	130	0	Total: 22 Private sector: 4 <sup>‡</sup> Restrictions: 0	767**

\* To 1 June 2012; \*\*Predicted; <sup>†</sup>One to the textiles sector, one to the public health sector and one to the private sector in the area of nanotechnologies (for which EFSA applied restrictions); <sup>‡</sup>Two to the chemical/pharmaceutical sector, one to a humanitarian non-profit organisation, and one self-employed in the mechanical components sector.

Implementation of EFSA's independence policies requires a significant allocation of resource both in the development of the IT support tool and the day-to-day operational activities. It also represents a considerable commitment for experts. By way of illustration, EFSA invested more than €0.6 m and three full-time staff equivalents in the development of its electronic declaration of interest tool (DOI tool) and annually the Authority allocates an estimated three FTEs and €180 k operational budget to the screening of declarations of interest and related administrative tasks. The updating of the DOI tool in response to the 2012 implementing rules also represents a significant investment of human and financial resources for EFSA.

## 5. Previous criticisms

Consistent with the increasing level of scrutiny on the decisions taken by public bodies in general, EFSA has attracted criticisms in relation to alleged conflicts of interest mainly from a number of related non-governmental organisations. Annex I presents a breakdown of the main criticisms that EFSA is aware of, as well as EFSA's analyses and responses. (The Executive Director's responses can also be found in the Correspondence section of EFSA's website<sup>11</sup>.) It is important to bear in mind that, when these criticisms

<sup>11</sup> <http://www.efsa.europa.eu/en/ed/edinterviews.htm>.

were made, interests were assessed under EFSA's previous policy, the 2007 Policy on Declarations of Interest. Criticisms have focused on three main aspects of EFSA's governance: (a) scientific experts; (b) Management Board and (c) EFSA staff. Despite the fact that EFSA has responded in detail to all the criticisms that have been levelled against the organisation and explained the legal and procedural basis for the decisions taken, the allegations are frequently repeated in the media.

In recent years, EFSA has introduced a series of enhancements to its procedures; this includes the Decision of EFSA's Executive Director of December 2010 in relation to the implementation of the obligations deriving from Articles 16, 17 and 19 of the EU Staff Regulations<sup>12</sup>. Staff members leaving EFSA are required to sign a declaration of honour and to confirm their awareness of continuing obligations to EFSA in relation to ethics and integrity. They must inform EFSA of their intention to engage in a future occupational activity describing the field(s) of activity of the future employer, their expected role (including information on the position they will occupy and the expected duration of that activity) and any links between the expected new role and the (previous) function at EFSA. The Executive Director, having regard to the interests of the service, may approve the requested activity, give conditional approval subject to any condition he or she sees fit, or forbid the person from undertaking that specific activity. The actions deployed by EFSA include imposing restrictions on the new employment for a period of up to two years and prohibition of the use of information and personal contacts. If EFSA became aware of any breach of rules, it would pursue formal legal remedies. Staff members are also obliged to inform EFSA of any negotiations with prospective employers and of any change in circumstances linked to their new or any other future post within a period of two years after leaving service.

Other measures taken since 2010 include:

- Staff training courses on Ethics & Integrity (beginning in 2010 and ongoing for new staff members);
- Register of activities undertaken, or to be undertaken, by its former staff within two years of leaving service (2010; EFSA internal);
- Appointment of an Ethics Advisor (July 2011);
- Code of Conduct of EFSA Management Board (2011)<sup>13</sup>;
- Revised Rules of Procedure of EFSA Management Board (2011)<sup>14</sup>;

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<sup>12</sup> Decision of the Executive Director implementing art.16 and 17(2) of the Staff Regulations and art.11 and 91 of the Conditions of Employment of Other Servants of the Union (2010; EFSA staff intranet).

<sup>13</sup> <http://www.efsa.europa.eu/en/keydocs/docs/codeconductmb110616.pdf>.

<sup>14</sup> <http://www.efsa.europa.eu/en/keydocs/docs/mbrules.pdf>.

- Training on the new policy and rules for all EFSA staff involved in their implementation (second semester, 2012);
- Dedicated session on ethics and integrity in the inaugural panel meetings (starting in July 2012);
- Mandatory session on ethics and integrity for members of EFSA's Management Board (October 2012 Board meeting).

## 6. Concluding comments

As described in the *Policy on Independence and Scientific Decision Making Processes*, EFSA's independence is not implemented by its declarations of interest system alone but also by a number of rules and procedures that cover organisational governance on the one hand and scientific governance on the other. Organisational governance covers the role of EFSA's Management Board and the allocation of responsibilities to the various bodies including the Executive Director, EFSA staff, the Advisory Forum and the Scientific Committee and Panels. Scientific governance includes the procedures regulating how mandates are negotiated and accepted, the development of scientific work, communication and consultation, and other elements aiming at ensuring that quality standards are met. One crucial factor, which many critics ignore, is that the scientific opinions adopted by EFSA Panels – each comprising up to 21 leading experts from the European scientific community – are always the outcome of collective deliberations and collective decisions. They never represent the views of a single expert or an individual school of thought. This reinforces impartiality and balance and, in those cases where Panels cannot reach consensus on a subject, experts can express minority views which are published in the meeting minutes on the EFSA website.

All of these measures are reinforced by EFSA's mandate for independent communication and its commitment to transparency. A variety of mechanisms are used to ensure that the key decision-making processes are accessible to all, including, *inter alia*, the webcasting of Management Board meetings; publication of all scientific outputs and the minutes of scientific meetings on EFSA's website; open access to declarations of interest; public access to EFSA's ongoing mandates; public consultations on key documents; and consultative workshops with stakeholders.

EFSA's approach to the development of its independence policies and procedures is based on the twin pillars of continuous improvement and rigorous implementation. The cycle of review and strengthening that we have put in place has enabled us to learn from experience, benchmark our practices against those in peer organisations, and take on board the contributions that we received during the public consultations – a self-initiative of EFSA – organised in the context of preparing our policies. EFSA's implementation of its previous policy (2007) has been independently audited both by the Internal Audit Service of the European Commission and by EFSA's own Internal Audit

Capacity in 2008 and 2009; of the 15 recommendations, all have been addressed and closed with the exception of one which relates to the minutes of scientific meetings which is in the implementation phase.

## **7. Next steps**

EFSA is committed to effectively implementing the new policy and rules and to reporting regularly to its stakeholders, partners and the general public through its Annual Activity Report and other instruments. The latter will include the outcomes of a completeness check of a random sample of declarations of interest, an initiative that was introduced in the new rules. The policy and rules will be reviewed within appropriate timeframes to ensure that they are fit for purpose: protecting the independence of scientific outputs on the one hand while ensuring that it continues to have access to the leading scientific expertise on the other. EFSA will continue to keep abreast of the latest thinking in this complex area, liaise with European partners and other like-minded organisations, and engage openly with stakeholders as we did with the development of the new policy. EFSA will also continue to vigorously defend all those who contribute to its work who are subject to unfounded or unjustified criticism.

The completion of the screening of the ANS and CEF Panel members and the resulting actions will mean that all EFSA's panel members will have been screened under the new rules well within the four-month transition period stipulated therein. The assessment of *ad hoc* experts involved in panel working groups and networks will also be completed within that timeframe. The annual declarations of interest of all staff members will be progressively assessed under the new rules as of 1 July 2012. Furthermore, a mandatory session on ethics and integrity will be organised for members of EFSA's Management Board at its October 2012 meeting. Board members are of course subject to its Code of Conduct and revised Rules of Procedure introduced in 2011. Under the latter, the Executive Director makes an assessment of a new declaration of interest and EFSA relies on the cooperation of the Board in relation to the management of the interest, bearing in mind that the Council is the appointing authority, not EFSA. The inaugural meetings of the new EFSA panels will also include dedicated sessions on ethics and integrity.

On a practical implementation level, EFSA will shortly complete the updating of the IT tool used to administer and manage the declaration of interest system to align with the new rules. EFSA has made a significant investment in this electronic tool which greatly enhances the consistency and traceability of decision-making in relation to the management of conflicts of interest.

**ANNEX 1: MAIN CRITICISMS OF EFSA IN THE MEDIA IN RELATION TO CONFLICTS OF INTEREST**

Individual(s)	Criticism	EFSA response
<b>Experts</b>		
<p>ANS Panel members: Fernando Aguilar, Riccardo Crebelli, John Gilbert, Sandro Grilli, Ursula Gundert-Remy, Jürgen König, John Larsen, Jean Charles Leblanc, Dominique Parent Massin, Iona Pratt, Paul Tobback, Gerrit Speijers</p>	<p>Reports in 2011 by the NGOs Corporate Europe Observatory (CEO) and Réseau Environnement Santé (RES) alleged that the named members of the ANS Panel had conflicts of interest (CoI) or had failed to declare collaborations with ILSI Europe.</p>	<p>EFSA examined the interests mentioned in the NGO report and contacted all the experts mentioned seeking additional background information and requesting an update of their declarations of interests (DoI). Upon update of the DoI, the information was screened in accordance with the existing procedures (2007 policy) for indentifying and handling potential conflicts of interests.</p> <p>Riccardo Crebelli: was not a member of a scientific committee advising ILSI as claimed by the NGO but rather participated in the scientific committee of a conference on food packaging, selecting speakers and publications. Therefore for Crebelli, no CoI could be identified. The topic of the conference was outside the ANS Panel’s remit.</p> <p>John Gilbert: a truncated and misleading presentation of the interest declared was provided by the NGO. Gilbert had ceased all activities with ILSI in 2009 and the task he was involved with dealt only with generic issues. No CoI could be identified.</p> <p>Sandro Grilli: consistently asked to be – and was – excluded from discussions in line with EFSA’s procedures for specific declarations of interest (declarations made in relation to specific meeting agenda items) where there might have been a risk of CoI with his consultancy to a retail</p>

Individual(s)	Criticism	EFSA response
		<p>organisation which he had already declared. This was the case for example with the Panel's work on aluminium and this was recorded in the relevant minutes.</p> <p>Ursula Gundert-Remy: was part of an advisory group to ILSI Research. As the activity in question had ceased and was in the past, it did not result in a CoI as specified in EFSA's 2007 Policy. Therefore, for Gundert-Remy, no CoI was identified. Furthermore, her advice to ILSI was outside the remit of the ANS Panel.</p> <p>Jürgen König: the new interest declared (association with ILSI) was in an area outside the remit of the ANS Panel and were not considered to constitute a CoI with regard to participation in the ANS Panel or its working groups.</p> <p>John Larsen: the new interest declared (association with ILSI) related either to a subject that was outside of the remit of the ANS Panel or of a general scientific nature for which a scientific consensus had been established by an opinion of the Scientific Committee of EFSA adopted in 2005 related to a harmonised approach for risk assessment of substances which are both genotoxic and carcinogenic. It was therefore concluded that these interests did not generate a CoI with regard to participation in the ANS Panel or its working groups.</p> <p>Dominique Parent Massin: the interest with Ajinomoto and Coca Cola had previously been declared but was missing in some annual DoIs in 2010 until the expert realised it.</p>

Individual(s)	Criticism	EFSA response
		<p>However, interests were systematically declared in the specific DoIs (declarations made in relation to specific meeting agenda items) and restrictions placed on the expert accordingly (e.g. in relation to aspartame).</p> <p>Iona Pratt: the new interest declared (collaboration with ILSI) was of a general scientific nature and was covered by the above-mentioned opinion of the Scientific Committee of EFSA adopted in 2005. It was concluded that it did not generate a CoI with regard to participation in the ANS Panel or its working groups.</p> <p>Gerrit Speijers: the new interest declared (association with ILSI) fell outside the remit of the ANS Panel and therefore did not generate a CoI with regard to participation in the ANS Panel or its working groups. Speijers was not a panel member but attended part of the March 2010 plenary meeting of the ANS Panel as a hearing expert to present the activities of a working group.</p> <p>The updated annual declarations of interest were published on the EFSA website. The other experts mentioned in the NGO report had already declared the interests in question.</p> <p>EFSA emphasises that interests should be assessed with respect to the activities that experts are required to carry out at EFSA, their role in the scientific group and in reference to EFSA's governance procedures as described on p. 5 of this report.</p>

Individual(s)	Criticism	EFSA response
ANS Panel: Ivonne Rietjens	Question from the specialist food publication EU Food Policy in 2011 over non-declaration of work with FEMA (Flavour and Extract Manufacturers Association) on advantame.	Ivonne Rietjens was a member of the FEMA expert panel and this interest was clearly declared in her annual declaration of interests. In this role, Rietjens did not have any direct relationship with members of FEMA or with companies submitting dossiers for the GRAS (generally regarded as safe) evaluation of substances. As advantame was evaluated by the FEMA expert panel under its conditions of intended use as flavouring substance <b>only</b> and not as a food additive, this interest was outside the remit of the ANS Panel and more generally of all EFSA's activities in which Rietjens participated. According to EFSA's 2007 Policy, such interests did not have to be declared.
CEF Panel: David Bell, Susan Barlow, Laurence Castle	Questions from the German newspaper Der Spiegel in 2010 on: David Bell's work with Dow Chemical Company and omission from his DOI; Susan Barlow's associations with ILSI, CEFIC (European Chemical Industry Council) and Greenfacts; and Laurence Castle's work on three ILSI expert panels.	David Bell: Bell's university received funding from Dow in 2008 to carry out research into dioxins. According to EFSA's Policy (2007) this did not result in a CoI because it was not received by the expert in a personal capacity. Although this work was related to dioxins, after consulting the Panel EFSA took a conservative approach at its plenary meeting in September 2008 and asked Bell to leave the meeting during the discussions on bisphenol A (BPA) to avoid any possible CoI.

Individual(s)	Criticism	EFSA response
		<p>Susan Barlow: Because of her high level of expertise and experience, Susan Barlow is involved in Europe and internationally in a number of scientific organisations. She has indicated all her activities in her declarations of interests, published on EFSA’s website. As well as her annual declaration of interest, Susan Barlow made a specific DOI before each meeting and decisions on her participation are recorded in the minutes of the meetings and published on EFSA’s website. No CoI was identified. (See later point on her role in the Working Group on TTC.)</p> <p>Laurence Castle: He indicated in his declaration of interest on EFSA’s website that he cooperated with ILSI from 2005 until 2009. Since his membership of that advisory body ceased in 2009, EFSA concluded that this did not constitute a CoI.</p>
<p>GMO Panel: Gijs Kleter, Harry Kuiper</p>	<p>A report by the NGO Testbiotech in 2010 claimed a conflict of interest due to involvement with the International Life Sciences Institute (ILSI).</p> <p>Testbiotech filed a complaint to the European Ombudsman in relation to Harry Kuiper in 2012.</p>	<p>Gijs Kleter was not a member of the ILSI Task Force as claimed in the NGO report, rather he was an independent co-author of two papers (published in 2004 and 2008) on general issues which were not related to any specific application or product. His involvement with ILSI ceased in 2007. Hence, there was no CoI.</p>

Individual(s)	Criticism	EFSA response
		<p>Harry Kuiper: The activities highlighted by Testbiotech occurred outside the timeframe considered relevant by the 2007 DoI policy (five years). This means that there was no CoI. Kuiper was not a member of the ILSI Task Force as claimed in the NGO report, rather as indicated in his declaration of interest on EFSA’s website, he was an independent co-author of two papers (published in 2004 and 2005) on general issues which were not related to any specific application or product. His involvement with ILSI ceased in 2005.</p> <p>The response of the European Ombudsman is awaited.</p>
<p>NDA Panel: Albert Flynn</p>	<p>Question from the German newspaper Süddeutsche Zeitung in 2011 on Albert Flynn’s participation in an advisory group of Kraft Foods.</p>	<p>Albert Flynn declared his participation in the advisory group in his DOI. He was excluded from any discussions or voting on items found to be in CoI with that activity.</p>
<p>PPR Panel: Theodorus Brock, Angelo Moretto</p>	<p>A report by the NGO Earth Open Source in 2011 claimed CoIs among Europe’s pesticide and food safety regulators.</p>	<p>Theodorus Brock is an employee of Alterra, a not-for-profit research institute under the umbrella of Wageningen University which carries out independent scientific research in the field of environmental sciences and is on the list of organizations designated by Member States to assist EFSA under Art. 36 of its Founding Regulation. Alterra is funded 66% by Dutch Ministries, 15% by the EU, 8% by the private sector, 7% by national authorities and 4% other. It has not developed or published risk assessment guidance or methodologies used in the regulatory process for pesticides, one of the main activities of EFSA’s PPR Panel. Alterra has ownership of a number of software and computational</p>

Individual(s)	Criticism	EFSA response
		<p>models. As declared in his declaration of interest, Alterra has provided advice to the agrochemical sector in relation to specific products (active substances); if any of these (or any other product competing with these products) should be discussed at the PPR Panel, Brock’s participation would be subject to restrictions under the specific declaration of interest system laid down in EFSA’s policies and rules. SETAC is a non-profit professional society for researchers and institutions engaged in the environmental sciences with a mission to support the development of principles and practices for protection, enhancement and management of sustainable environmental quality and ecosystem integrity. It has a balanced membership between academia, industry and government. Theodorus Brock receives no funding from his involvement in SETAC. No CoI could be identified.</p> <p>Angelo Moretto: did not declare a financial interest related to the assessment of chemical substances. EFSA started a process aimed at verifying whether a breach of trust occurred but he resigned from his position of member of PPR before the conclusion of the process. The scientific outputs to which Angelo Moretto had contributed were audited by EFSA’s Internal Audit Capacity for any evidence of bias; none was found. Over 400 hours of staff time were devoted to this audit.</p>

<b>Individual(s)</b>	<b>Criticism</b>	<b>EFSA response</b>
<p>Working Group on the Threshold of Toxicological Concern (TTC): Alan Boobis, Susan Barlow</p>	<p>Question from the German magazine Der Spiegel in 2011 in relation to Alan Boobis not declaring ILSI work in DOI.</p> <p>EU Food Policy question in 2011 on Alan Boobis's involvement on TTC with ILSI and EFSA.</p> <p>Various question on the selection of the Working Group on TTC and the role of Susan Barlow as Chair.</p>	<p>Alan Boobis made clear that his involvement with ILSI Europe was not related to any substances reviewed by EFSA. He was involved in a group investigating whether different techniques can be used in combination with the TTC concept to determine whether particular substances in chemical mixtures of unknown identity could be of toxicological concern. That aspect of the application of the TTC concept is not part of the EFSA opinion and therefore no CoI existed.</p> <p>Susan Barlow, an expert member of the Scientific Committee since July 2008, was invited to chair the TTC Working Group as she is one of Europe's leading experts in the field of chemical toxicology. The Working Group evaluated the relevance and reliability of the TTC for submission to the Scientific Committee. Susan Barlow wrote a monograph, or a description, on TTC for ILSI in 2005. This was not a position paper or guidance document of ILSI but summarised existing knowledge on a complex scientific concept for a lay audience. She declared this work at the time in her annual declaration of interests and EFSA did not consider this work to constitute a conflict of interest when assessing her declaration of interests in 2009.</p>

<b>Individual(s)</b>	<b>Criticism</b>	<b>EFSA response</b>
EFSA's Scientific Committee: Corrado Galli	A report by the NGO Earth Open Source in 2011 claimed CoIs among Europe's pesticide and food safety regulators.	Corrado Galli did not declare a financial interest related to the assessment of chemical substances. EFSA started a process aimed at verifying whether a breach of trust occurred but he resigned from his position of member of Scientific Committee and Working Group on Nanotoxicology before the conclusion of the process. The scientific outputs to which Corrado Galli had contributed were audited by EFSA's Internal Audit Capacity for any evidence of bias; none was found.

Individual(s)	Criticism	EFSA response
<b>EFSA Management Board Members</b>		
Diána Bánáti	Involvement with ILSI (various sources of criticism)	<p data-bbox="1384 432 2036 743">Diána Bánáti was appointed member of the EFSA Management Board in June 2006 and re-appointed for a second term in 2010 with a 4-year mandate. She was elected Chair of the Board in October 2010. In October 2010 the Board decided that in order to avoid any misperception of its role, the chair should refrain from having management or influential roles in organisations representing interests in the food chain, other than public interest. As a result, Diána Bánáti resigned from the board of ILSI Europe.</p> <p data-bbox="1384 783 2036 1018">Diána Bánáti informed EFSA on 8 May 2012 of her decision to take up a professional position at the International Life Sciences Institute (ILSI). EFSA regarded this position as incompatible with her role as member and Chair of the Board. Upon request of EFSA, Diána Bánáti resigned from the Board and the Authority made this decision known as soon as possible on 9 May 2012.</p> <p data-bbox="1384 1074 2036 1315">EFSA has no role in the selection process of the members of the Board; members are appointed by Council after consulting the European Parliament on the basis of a short-list drawn up by the European Commission following an open call for expression of interest. The Board has no influence on EFSA's scientific advice; this is the sole responsibility of EFSA's Scientific Panels and Scientific</p>

Individual(s)	Criticism	EFSA response
Milan Kovác, Matthias Horst, Jiri Ruprich, Piet Vanthemsche	A 2011 report by the NGO CEO alleged conflicts of interest of four Management Board members with Danone, ILSI, EUFIC (European Food Information Council) and COPA (the European farmers' representative body).	<p>Committee. The Board voluntarily adopted a Code of Conduct for its members in June 2011 along with new procedures for screening the declarations of interest of Board members in October 2011.</p> <p>EFSA's Founding Regulation stipulates that four members of the Management Board "shall have their background in organisations representing consumers and other interests in the food chain". Milan Kovác, Matthias Horst, Jiri Ruprich and Piet Vanthemsche were appointed by the Council in recognition of their high level of expertise and valuable experience in food safety. All the interests referred to in the report had been declared by the members in question. .</p> <p>EFSA has no role in the selection process of the members of the Board; members are appointed by Council after consulting the European Parliament on the basis of a short-list drawn up by the European Commission following an open call for expression of interest. The Board has no influence on EFSA's scientific advice; this is the sole responsibility of EFSA's Scientific Panels and Scientific Committee. The Board voluntarily adopted a Code of Conduct for its members in June 2011 along with new procedures for screening the declarations of interest of Board members in October 2011.</p>

Individual(s)	Criticism	EFSA response
		<p>Milan Kovác updated his DoI to reflect ILSI Global as a "private" organisation. He terminated any involvement with either ILSI Global or ILSI Europe in 2011.</p> <p>Jiri Ruprich was a member of the Czech Scientific Committee of the Danone Institute until March 2011; he was not a member of its management body and received no financial support.</p>

Individual(s)	Criticism	EFSA response
<b>EFSA Staff Members</b>		
Suzy Renckens	A joint report by the NGOs Testbiotech and CEO criticises Suzy Renckens’ employment at Syngenta after her contract at EFSA had expired.	<p>Suzy Renckens was head of the scientific secretariat unit of the EFSA GMO Panel when her contract expired in March 2008. After a brief period, she took up employment with Syngenta during May 2008 and informed EFSA at that time. In accordance with Article 16 of the EU Staff Regulations and Conditions applicable to the other servants of the Union and in line with common practice in EU Agencies, EFSA assessed the information provided by Suzy Renckens. As she was not a decision maker in relation to EFSA’s scientific advice, authorisations or approvals, EFSA raised no objections to the new position. In November 2009, EFSA checked with Suzy Renckens as regards her current employment status and reminded her of her obligations in relation to confidentiality. At no time has EFSA seen any evidence to suggest that Suzy Renckens breached her responsibilities. If that were the case, legal action by EFSA would be considered.</p> <p>Since then, EFSA has put in place a detailed procedure to be followed by staff leaving EFSA (see description of Decision of Executive Director on staff leaving service on p. 7 of this report).</p>

<b>Individual(s)</b>	<b>Criticism</b>	<b>EFSA response</b>
Laura Smillie	A report by the NGO CEO claimed that EFSA’s employment of Laura Smillie represented a CoI due to her previous employment at EUFIC.	Laura Smillie was hired on a fixed-term contract following a transparent selection procedure that included both written and oral examinations, under the scrutiny of a selection panel of EFSA staff members. She works full time for EFSA, is paid by the Authority and, like all staff, is subject to the Staff Regulations applicable to the European Commission, EU Institutions, bodies and agencies. Laura Smillie is fully subject to the obligations of avoiding conflicts of interest during her time at EFSA, being impartial and fair, behaving professionally and respecting the confidentiality of data. Hence, like any other civil servant, she is required to act independently in the public interest. She is required to complete an annual DoI, which is then screened by the Appointing Authority and used as a basis for preventing the occurrence of CoIs. EFSA concluded that no CoI existed between her previous experience and her position at EFSA.

**ANNEX 2: ANNUAL AND SPECIFIC DECLARATION OF INTERESTS (IMPLEMENTING RULES 2012)**

**I: ANNUAL DECLARATION OF INTERESTS (ADoI)**

Title (Ms., Mr., Dr., Prof.): \_\_\_\_\_

**First Name:** \_\_\_\_\_

**Surname:** \_\_\_\_\_

**Profession:** \_\_\_\_\_

EFSA involvement \_\_\_\_\_

**hereby declares to have the following interests relating to his or her EFSA activities**

*(Please specify the interest that you or your close family members currently have or have had last year and/or in the past 5 years.)*

I. Economic interest <sup>4</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to remit of the scientific group.
4. Please indicate any economic stake or share in a body with an interest in the subject matter, including the stocks, equities or bonds thereof, or of one of its subsidiaries or of a company in which it has a holding. Financial instruments on which the individual has no influence are not to be considered relevant for the purposes of the present decision.

<b>II. Member of a Managing Body or equivalent structure<sup>5</sup></b>	<b>Current <sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period <sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation <sup>2</sup></b>	<b>Subject matter <sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
5. Please indicate any participation in the internal decision-making (e.g. board membership, directorship) of a public or private entity with an interest in the subject matter.

<b>III. Member of a Scientific Advisory Body<sup>6</sup></b>	<b>Current <sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period <sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation <sup>2</sup></b>	<b>Subject matter <sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
6. Please indicate any participation in the works of a scientific advisory body, created permanent and created ad hoc, managed by a body with an interest in the subject matter, with a right to have an influence on its output(s). This includes also past participation in scientific activities carried out with EFSA, such as membership of Scientific Panels, Working Groups and Networks. Any advice related to product development shall be declared exclusively under “Ad hoc or occasional consultancy”.

IV. Employment <sup>7</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization and whether it is a Food Safety Organisation or not.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
7. Please indicate any form of regular occupation or business, part-time or full-time, paid or unpaid, including self-employment (e.g. consultancy), in any body with an interest in the subject matter. This also includes employment by EFSA.

<b>V. Ad hoc or occasional consultancy/Advisory <sup>8</sup></b>	<b>Current <sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period <sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation <sup>2</sup></b>	<b>Subject matter <sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
8. Please indicate any ad hoc or occasional activity in which the concerned person provides advice or services to undertakings, trade associations or other bodies with an interest in the subject matter. This includes also services provided on an honorary basis (i.e. for free or without the payment of fees or emoluments) and any advice related to products, their development and/or assessment methods thereof.

VI. Research funding <sup>9</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
9. Please indicate any funding for research or developmental work on the subject matter received from any public or private body by the concerned person in his or her personal capacity or falling under the professional sphere of influence of that person. The overall proportion of each funding with respect to the annual funding that comes under the professional sphere of influence of that person shall be indicated. It includes grants, rents, reimbursement of expenses, sponsorships and fellowships, also received from EFSA. Grouping by funders and supporters or by subject matters shall be accepted.

**Please also indicate whether the research (co-)funding received from the private sector during the year preceding the submission of the DoI exceeds 25% of the annual research budget that is managed by you for the area under concern or that is otherwise benefiting you, including research funding by your organisation (Yes or No): \_\_\_\_\_**

VII. Intellectual property <sup>10</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
10. Please indicate any right on the subject matter granted to creators and owners of works that are the result of human intellectual creativity and led to a financial gain. Plain authorship and publications shall not be declared.

VIII. Other membership or affiliation <sup>11</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
11. Please indicate any membership or affiliation not falling under the definitions provided above and relevant for the purposes of the present decision to any body with an interest in the subject matter, including professional organisations.

IX. Other <sup>12</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of all organisations.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the remit of the scientific group.
12. Please indicate any interest not falling under the definitions provided above and relevant for the purposes of the present decision.

**I confirm that:**

- I consider myself to be in a potential CoI with respect to the following EFSA activity  
\_\_\_\_\_ for the following reason  
\_\_\_\_\_ or
  
- I consider myself not to be in a potential conflict of interest with respect to my activities at EFSA.

**I hereby declare that I have read the Implementing Decision of EFSA’s Policy on Independence and scientific decision making processes regarding declarations of interest and that the above declaration is truthful and complete.**

**Date:** \_\_\_\_\_ **Signature:** \_\_\_\_\_

If you need more sheets to declare your interests, do not hesitate to use blank ones or to ask for them, but please sign each one of them and attach them to this form.

**II: SPECIFIC DECLARATION OF INTERESTS (SDoI)**

**ACTIVITIES IN EFSA<sup>15</sup>:** \_\_\_\_\_

**Title** (Ms., Mr., Dr., Prof.): \_\_\_\_\_

**First Name:** \_\_\_\_\_

**Surname:** \_\_\_\_\_

**Profession:** \_\_\_\_\_

**Meeting of ..... Scientific Committee/Scientific Panel/Network**

**Meeting of the ..... Working Group**

**EFSA Mandate .....**

<b>Meeting dates:</b>	
<b>Question numbers discussed:</b>	

<sup>15</sup> Please specify the current activities within EFSA (e.g. Mandate or Meeting) and insert details (e.g. agenda).

#	Items on the agenda

**hereby declares to have the following interests relating to the items on the agenda of the meeting indicated above, unless already declared in an ADoI**

*(Please specify the interest that you or your close family members currently have or have had last year and/or in the past 5 years)*

<b>I. Economic interest<sup>4</sup></b>	<b>Current<sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period<sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation<sup>2</sup></b>	<b>Subject matter<sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
4. Please indicate any economic stake or share in a body with an interest in the items on the agenda, including the stocks, equities or bonds thereof, or of one of its subsidiaries or of a company in which it has a holding. Financial instruments on which the individual has no influence are not to be considered relevant for the purposes of the present decision.

<b>II. Member of a Managing Body or equivalent structure<sup>5</sup></b>	<b>Current<sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period<sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation<sup>2</sup></b>	<b>Subject matter<sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
5. Please indicate any participation in the internal decision-making (e.g. board membership, directorship) of a public or private entity with an interest in the subject matters on the agenda

<b>III. Member of a Scientific Advisory Body<sup>6</sup></b>	<b>Current <sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period <sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation <sup>2</sup></b>	<b>Subject matter <sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
6. Please indicate any participation in the works of a scientific advisory body, created permanent and created ad hoc, managed by a body with an interest in the subject matters on the agenda, with the right to have an influence on its output(s). This includes also past participation in scientific activities carried out with EFSA, such as membership of Scientific Panels, Working Groups and Networks. Any advice related to product development shall be declared exclusively under “Ad hoc or occasional consultancy”.

IV. Employment <sup>7</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
7. Please indicate any form of regular occupation or business, part-time or full-time, paid or unpaid, including self-employment (e.g. consultancy), in any body with an interest in the subject matters of the agenda. This also includes employment by EFSA.

V. Ad hoc or occasional Consultancy <sup>8</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
8. Please indicate any *ad hoc* or occasional activity in which the concerned person provides advice or services to undertakings, trade associations or other bodies with an interest in the subject matter of the agenda. This includes also services provided on a honorary basis (i.e. for free or without the payment of fees or emoluments) and any advice related to products, their development and/or assessment methods thereof.

VI. Research funding <sup>9</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
9. Please indicate any funding for research or developmental work in the subject matters on the agenda received from any public or private body by the concerned person in his or her personal capacity or falling under the professional sphere of influence of that person. The overall proportion of each funding with respect to the annual funding that comes under the professional sphere of influence of that person shall be indicated. It includes grants, rents, reimbursement of expenses, sponsorships and fellowships, also received from EFSA. Grouping by funders and supporters or by subject matters shall be accepted. Please also indicate whether the research (co-)funding received from the private sector during the last five years exceeds 25% of the annual budget that is managed by you for the area under concern, including projects funded by your organisation.

**Please also indicate whether the research (co-)funding received from the private sector during the year preceding the submission of the DoI exceeds 25% of the annual research budget that is managed by you for the area under concern or that is otherwise benefiting you, including research funding by your organisation (Yes or No): \_\_\_\_\_**

<b>VII. Intellectual property<sup>10</sup></b>	<b>Current<sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period<sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation<sup>2</sup></b>	<b>Subject matter<sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
4. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
10. Please indicate any right on the subject matter granted to creators and owners of works that are the result of human intellectual creativity and led to a financial gain with respect to the items on the agenda. Plain authorship and publications shall not be declared.

<b>VIII. Other membership or affiliation<sup>11</sup></b>	<b>Current<sup>1</sup></b> <i>Please answer Yes or No</i>	<b>Past Period<sup>1</sup></b> <i>From/To</i> <i>(Month/Year)</i>	<b>Name of Organisation<sup>2</sup></b>	<b>Subject matter<sup>3</sup></b>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
11. Please indicate any membership or affiliation not falling under the definitions provided above and relevant for the purposes of the present decision to any body with an interest in the subject matters on the agenda, including professional organisations.

IX. Other <sup>12</sup>	Current <sup>1</sup> <i>Please answer Yes or No</i>	Past Period <sup>1</sup> <i>From/To (Month/Year)</i>	Name of Organisation <sup>2</sup>	Subject matter <sup>3</sup>

1. Please indicate activities that are currently ongoing. Indicate starting date (month/year). For activities that are no longer ongoing and that have been completed in the preceding five years, please indicate starting and ending date (month/year).
2. Please indicate name, location and nature of the organization. Please also specify how it relates to the item on the agenda of the relevant meeting.
3. Please indicate the activity of the entity, e.g. types of substances, products, guidance documents, processes or policies and how it relates to the item(s) in the agenda or the mandate.
12. Please indicate any interest not falling under the definitions provided above and relevant for the purposes of the present decision.

**I confirm that:**

- I consider myself to be in a potential CoI with respect to the following agenda items  
 \_\_\_\_\_  
 \_\_\_\_\_ or  
 the following reason
- I consider myself not to be in a potential conflict of interest with respect to the agenda above.

**I hereby declare that I have read the Implementing Decision of EFSA's Policy on Independence and scientific decision making processes regarding declarations of interest and that the above declaration is truthful and complete.**

**Date:** \_\_\_\_\_ **Signature:** \_\_\_\_\_

If you need more sheets to declare your interests, do not hesitate to use blank ones or to ask for them, but please sign each one of them and attach them to this form.