

SCIENTIFIC EVALUATION OF REGULATED PRODUCTS DIRECTORATE

Parma, 28th August 2012
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Ms Nina Holland
Corporate Europe Observatory
26, rue d'Edimbourg
1050 Bruxelles
Belgium

Ms Claire Robinson
Earth Open Source
2nd floor 145-147
St John Street
London EC1V 4PY
United Kingdom

Subject: your letter dated 6/08/2012

Dear Ms Holland, dear Ms Robinson,

Thank you for your letter dated 6 August 2012 in which you ask for action to be taken to address non-declared ILSI activities of a member of EFSA's Scientific Panel on Food Contact Materials, Enzymes, Flavourings and Processing Aids (CEF Panel).

I would first like to point out that EFSA has responded to your comments regarding members of EFSA's Panel on Food Additives and Nutrient Sources added to Food (ANS Panel) in a letter dated 16th September, 2011. Secondly you might find it useful that I clarify a factual error in your letter as the "Decision of the Executive Director implementing EFSA's Policy on Independence and Scientific Decision-Making Processes regarding Declaration of Interests" does not by default forbid experts of EFSA's Scientific Committee, scientific Panels or Working Groups from carrying out activities with the International Life Science Institute (ILSI). Involvement with any given organisation can of course be related to a wide variety of subject matters, some of which might conflict with current engagements with EFSA, while others may not. All interests declared by experts are assessed by EFSA to determine if there is a potential conflict of interest in line with the Implementing Rules (see also Art. 9 c) and EFSA then takes a decision on whether or not an expert is allowed to participate in EFSA's scientific activities and in which role (e.g. chairman/member of a panel/working group).

With respect to your comments related to CEF Panel member Dr Roland Franz, I would like to point out that Dr. Franz together with 15 other scientists is a member of a scientific committee of the symposium to be held in November this year to which you refer. Most of these scientists are from public universities, institutes or authorities. As you are aware the role of the scientific committee of a conference is to screen abstracts, select papers and speakers for the conference and give advice on the programme. According to the implementing rules this is an activity that is compatible with the EFSA mandates Dr. Franz is contributing to as well as the roles he has. Dr. Franz declared this activity in his annual declaration of interest dated 9 July 2012.

In addition, I would like to remind you that the Implementing Rules took effect from 1st July, 2012 and were applied in the recent renewal of EFSA's Scientific Committee and eight of its scientific Panels. For all other expert working with EFSA, including members of the ANS and CEF Panels, there is a four-month transition period starting July 1 during which their declarations of interest will be reviewed.

We remain at your disposal for any further information you may require.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Per Bergman', with a long horizontal stroke extending to the right.

Per Bergman
Director

Cc: C. Heppner; A. Feigenbaum; D. Spyropoulos; E. Barthélémy (EFSA)