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European Commissioner for Health and Food Safety
Mr Vytenis Andriukaitis
European Commissioner for Research, Science and Innovation
Mr. Carlos Moedas
B – 1049 Brussels
Belgium

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VR 202119

OPEN LETTER

9 January 2015

Dear Commissioners,

Thank you very much for your letter of 17 December 2014, signed by Robert-Jan Smits, DG Research and Innovation. Unfortunately, we are rather disappointed with the reply. It appears that the Commission is not yet ready to discuss the problems in detail, and is even supporting attempts by industry to impact publicly funded risk research. We would therefore like to explain the problem in more detail:

Firstly, we do not share your point of view that the EU Commission has a long history of successfully managing risk research in the context of genetically engineered plants. Careful reading shows that the report published by the EU-Commission (A decade of EU-funded GMO research, 2001-2010) hardly supports this statement. However, this is not something we would like to discuss in detail in this letter. We just want to point out that there is no basis to rely on previous efforts of the EU Commission when it comes to the flaws in current GRACE project.

Secondly, your letter states that the selection for this project was carried out by independent and qualified experts. However, as we found out in 2013, the EU Commission is not willing to name the experts involved. The only information available on this matter is a published overall list of a number of experts, with several individuals having some ties to industry. In order to create more transparency, the EU Commission should now name the experts involved in this specific case.

Thirdly, you mention that the involvement of industry and linking with further activities was intended for this project. While we agree that representatives of industry should be invited to comment on the project to the same extent as other stakeholders, we strongly emphasise that the project itself and the feeding trials should be conducted strictly independently from those interests. But, as shown in our report, institutions such as ISBR (International Society for Biosafetty Research), ILSI (Internal Life Science Institute) and PRRI (Public Research and Regulation Initiative) have a dominant position in a network within GRACE. Your statement indicates that you do not seem to be aware of this problem. On the contrary, it seems to encourage attempts of industry to influence publicly funded risk research.

Fourthly, you mention a platform for public discussion provided by the Archives of Toxicology. However, as we argued in detail, this journal is in a difficult position because it has to defend its own credibility. Thus, it cannot be considered as a neutral platform for public discussion. Further research conducted by Testbiotech (see attachment) has confirmed that the links between the journal and its editors are too close to the main author of the publication and to industry. For this reason, we recommended naming the experts involved in the peer review of the article, and retracting the publication. Your answer gives no response to these recommendations.

Therefore, we kindly ask you to provide us with a more detailed answer to our reports and recommendations.

Further, Testbiotech is of the opinion that this case should become a starting point to re-organise EU risk research in a way that it becomes much more independent from industry. Our recommendations to the EU Commission are:

- establish much higher standards to avoid conflicts of interest of experts involved in publicly funded research projects and for experts working with the EU authorities;
- give full transparency on the experts involved in the selection of the specific EU projects;
- enable the participation of civil society groups active in areas such as consumer protection, environment, and animal welfare in the selection of goals, subjects and experts of the EU funded risk research. Those who are bearing the risks (or are representing them) should be involved in the decision-making processes;
- encourage EU Member States to also start similar initiatives;
- further mechanisms should be developed for additional funding of public risk research by establishing mandatory financial contributions from industry.

We would very much welcome discussing the points raised in this letter and would be happy to have a meeting with the Commission.

We look forward to your reply, with very best wishes for 2015

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Attached: Report of Testbiotech from January 2015

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