

Testbiotech e. V. | Frohschammerstraße 14 | 80807 München

To the President of the European Commission
José Manuel Barroso
1049 Brussels, Belgium

CC DG Environment
CC DG Sanco
CC selected members of EU Parliament

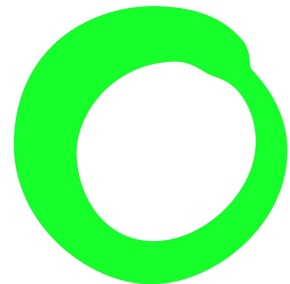
Munich, 21 January 2010

Head of EFSA GMO panel moved to Syngenta

Dear Mr Barroso,

I am writing to you on behalf of four organisations, the Corporate Europe Observatory CEO (Brussels), Friends of the Earth FOE Europe, Lobbycontrol (Germany) and Testbiotech (Germany).

We would like to draw your attention to a case of so-called 'revolving doors' between EU authorities and the industry, which in this case involved the European Food Safety Agency (EFSA), particularly the work of the GMO panel, and Suzy Renckens, the former head of EFSA's GMO panel. Renckens became Head of Biotech Regulatory Affairs for Europe, Africa and Middle East (EAME) at Syngenta in May 2008, shortly after leaving EFSA's GMO panel at the end of March 2008 after five years with the European authority.



**Friends of
the Earth
Europe**

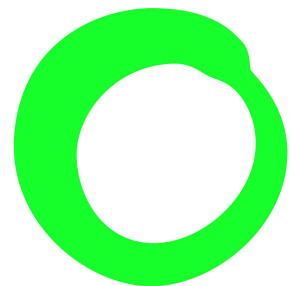
**TEST
BIOTECH**

EFSA did not raise any objections or impose any obligations in relation to her new position, despite the fact that former members of EU public service are supposed to ask for approval from their institutions for any new post within a period of two years of leaving. The EFSA only appeared to act on this conflict after it was highlighted by the NGO Testbiotech, sending several e-mails to Ms Renckens reminding her of her obligations under Art. 16 of the European Staff Regulations. Up until now the EFSA has not taken any formal decision (approval or objection) on this case.

According to her own e-mail, Ms Renckens now lobbies for Syngenta to influence EU decision-making on GMOs, the issue she was responsible for regulating before with EFSA. This seems to bear a serious potential for conflicts of interests, since no cooling-off period was agreed and no restrictions have been imposed. We think a tightly enforced cooling-off period is essential for several reasons. For example, decision-makers must be discouraged from negotiating future lobbying jobs while still in office, as this could influence their stance on issues affecting their future employers. And particularly in the first period after going through the revolving door, decision-makers can exploit their previous status to unduly influence former staff.

We think that this case requires action. We do not think that the management of EFSA acted properly in this case. Despite the fact that the current situation was made public in November 2009, as far as we are aware, the EFSA still has not taken sufficient action or received the clarifications necessary in this case.

We would also like to raise serious doubts relating to the ongoing work of the EFSA GMO panel, since the current guidelines as used by EFSA were basically developed under the coordination of Ms Renckens. Although some of the details in the guidelines have been updated since then there has been no substantial change in their basic



**Friends of
the Earth
Europe**



concept.

These guidelines have been the subject of much debate for some years, and many observers regard them as being insufficient in the light of EU regulations, which require high standards for risk assessment of genetically engineered organisms.

We urge the European Commission to start a thorough investigation of the circumstances and the consequences of this case taking into account the need for rigorous, independent and transparent risk assessment.

Thank you very much for your attention. We look forward to hearing about the initiatives planned by the new European Commission in this context.

Yours sincerely,

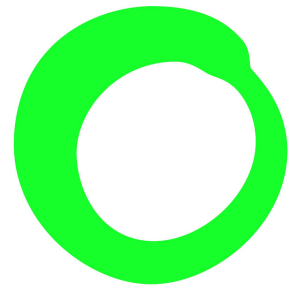


Christoph Then, Executive Director of Testbiotech e.V., Germany

Testbiotech e.V.
Frohschammerstraße 14
80807 München
Fon.: 0 89 - 35 89 92 76
Fax: 0 89 - 359 66 22
info@testbiotech.org
www.testbiotech.org

Attachments: documents as submitted by EFSA to Testbiotech

for further informations see also www.testbiotech.



**Friends of
the Earth
Europe**

**TEST
BIOTECH**