Annex to the open letter from Testbiotech to Bernhard Url about conflicts of interest at the European Food Safety Authority (EFSA)

Testbiotech e. V.
Institute for Independent
Impact Assessment in
Biotechnology

(1) Table: Overview of some relevant institutions with strong affiliations to GMO industry
(modified from Bauer-Panskus & Then, 2015b)

Institution	Activities
ILSI (International Life Sciences Institute)	The International Life Sciences Institute (ILSI) is mainly funded by food, pharmaceutical and agrochemical companies. Its members include companies such as BASF, Bayer CropScience, DuPont and Monsanto.[1] Currently, a representative of Nestlé is president of the international governing body of ILSI, the Board of Trustees.[2] ILSI's work has been criticised for many years. For example, the organisation was officially rebuked by the WHO because of its collaboration with the tobacco industry.[3] The European Food Safety Authority was also critical of the work of the organisation in a letter sent to the European Parliament in 2012. According to the letter, ILSI experts "cannot be considered for the role of chair or vice-chair of any of EFSA's scientific groups, nor can [s/he] become a member of a single mandate Working Group in a scientific area for which [s/he] ha[s] current experience at ILSI".[4] This statement applies to all relevant areas of expertise such as biotechnology, pesticides or food additives. In 2012, ILSI was also excluded from EFSA's Stakeholder Platform.[5]
IOBC/WPRS (International Organization for Biological Control West Palearctic Regional Section)	Working Group „GMO's in integrated plant production".[6] A central focal point of this working group is the development of a new approach to environmental risk assessment. This resulted in joint publications with researchers from biotechnology corporations such as Syngenta, Monsanto, Bayer, BASF, Pioneer, Dow International Life Sciences Institute (ILSI) in 2008[7] and 2011[8]. Until recently, the steering committee of the working group included Alan Raybould from Syngenta.[9] Many scientists of this group are or were also active in ILSI or ISBR.

1 http://www.ilsi.org/Documents/Members.pdf
2 http://www.ilsi.org/Pages/Leadership.aspx
3 http://www.who.int/tobacco/media/en/ILSI.pdf
4 http://www.efsa.europa.eu/en/press/news/120516.htm
5 http://elc-eu.org/uploads/press_room/ELC_June_2012_press_clippings.pdf, http://www.efsa.europa.eu/en/events/event/120614a.htm
6 http://www.iobc-wprs.org/expert_groups/18_wg_gmo.html
7 Romeis, J., Bartsch, D., Bigler, F., Candolfi, M. P., Gielkens, M. M., Hartley, S. E., Hellmich, R.L., Huesing, J.E., Jepson, P.C., Layton, R., Quemada, H., Raybould, A., Rose, R.I., Schiemann, J., Sears, M.K., Shelton, A.M., Sweet, J., Vaituzis, Z., Wolt, J. D. (2008) Assessment of risk of insect-resistant transgenic crops to nontarget arthropods. Nature biotechnology, 26(2): 203-208.
8 Romeis, J., Hellmich, R.L., Candolfi, M.P., Carstens, K., De Schrijver, A., Gatehouse, A.M., Herman, R.A., Huesing, J.E., McLean, M.A., Raybould, A., Shelton, A.M., Waggoner, A. (2011) „Recommendations for the design of laboratory studies on non-target arthropods for risk assessment of genetically engineered plants. Transgenic Research, 20(1): 1-22.
9 https://web.archive.org/web/20150217030255/http://iobc-wprs.org/expert_groups/18_wg_gmo.html

Institution	Activities
ISBR (International Society for Biosafety Research)	The International Society for Biosafety Research (ISBR) is closely linked to the biotechnology and agrochemical industry as well as other organisations such as ILSI. The society's conferences are regularly sponsored by biotech corporations such as Monsanto, Bayer, Dow AgroSciences, DuPont and Syngenta as well as by the international federation of genetic engineering industry, CropLife International.[10] The ISBR Board consists almost exclusively of experts from industry or with ILSI affiliations (see also Bauer-Panskus & Then, 2015a).[11] In its current financial report, ISBR acknowledges further financial support by CropLife.[12] Currently, other industry representatives from ILSI, Monsanto or Syngenta are also part of the organisation's leadership.[13]

(2) Some examples of members of the EFSA GMO Panel and GMO Unit actively involved in organisations with a strong affiliation to the GMO industry

Adinda De Schrijver

Member of GMO Panel (since 2015): Active in ILSI, ISBR and IOBC
According to her declaration of interest, Adinda De Schrijver is an active member of the International Society for Biosafety Research (ISBR). She has been a frequent contributor to the organisation's conferences in the past.[14] She is also involved in ILSI activities and has co-authored several ILSI publications.[15] She was also active in IOBC and acted as a member of the programme committee of an IOBC conference in 2013.[16]

Yann Devos

Member of the EFSA GMO Unit: Affiliations with ILSI and IOBC and ISBR
Yann Devos is long-time EFSA GMO Unit officer. Apart from his work for the authority, he is active in ILSI, IOBC and ISBR and has held several presentations at ILSI, IOBC and ISBR conferences. He was member of the Program Committee of the ISBR conferences in 2014[17] and

10 http://isbr.info/ISBGMO13/Sponsors
11 http://isbr.info/Board_of_Directors
12 http://isbr.info/files/tinymce/uploaded/Financial%20Operations%20Report%202015.pdf
13 http://isbr.info/Communications_%26_Outreach
14 http://isbr.info/ISBGMO13/Symposia
15 Carstens, K., Anderson, J., Bachman, P., De Schrijver, A., Dively, G., Federici, B., Hamer, M., Gielkens, M., Jensen, P., Lamp, W., Rauschen, S., Ridley, G., Romeis, J., Waggoner, A. (2012) Genetically modified crops and aquatic ecosystems: considerations for environmental risk assessment and non-target organism testing. Transgenic research, 21(4): 813-842. http://link.springer.com/article/10.1007/s11248-011-9569-8 Romeis, J., Hellmich, R. L., Candolfi, M. P., Carstens, K., De Schrijver, A., Gatehouse, A. M., ... & Shelton, A. M. (2011). Recommendations for the design of laboratory studies on non-target arthropods for risk assessment of genetically engineered plants. Transgenic research, 20(1), 1-22. http://link.springer.com/article/10.1007/s11248-010-9446-x Carstens, K., Cayabyab, B., De Schrijver, A., Gadaleta, P. G., Hellmich, R. L., Romeis, J., ... & Wach, M. (2014). Surrogate species selection for assessing potential adverse environmental impacts of genetically engineered insect-resistant plants on non-target organisms. GM crops & food, 5(1), 11-15. http://www.tandfonline.com/doi/abs/10.4161/gmcr.26560
16 https://web.archive.org/web/20130303022935/http://www.eigmo.info/
17 http://isbr.info/ISBGMO13/Committees

2012[18] as well as member of the Programme Committee of an IOBC conference in 2015.[19] He is co-author of a recent paper on genetically engineered RNAi crops, along with ILSI staff,[20] and has co-authored several other papers with ILSI or industry scientists.[21]

Jeremy Sweet

Member of the GMO Panel: Actively involved with ISBR
Jeremy Sweet is a long-time member of the EFSA GMO Panel. He was re-elected to the Panel in 2015. According to his declaration of interests, he is a member of ISBR.[22] His connections with industry groups such as ISBR or the International Organisation for Biological Control (IOBC) have been reported in the past (Bauer-Panskus & Then, 2013). For example, he was a member of several committees in IOBC or ISBR, such as the Programme Committee of an IOBC conference in 2013.[23]

Jean-Michel Wal

Member of the GMO Panel: Connections with ILSI and the food industry

Jean-Michel Wal is a long-time member of the EFSA GMO Panel. He was re-elected to the Panel in 2015. His connections with industry groups such as ILSI have been reported in the past. According to his current declaration of interest, he is still involved in many projects for food companies such as Nestlé. He is also still engaged in ILSI activities and co-author of several ILSI publications. According to his account, there is a constant involvement in ILSI activities:
„Occasional participation (ca. 12 participations during the past 10 years) in working groups and in scientific meetings or workshops (as speaker/lecturer) in the field of assessment of safety and particularly allergenicity of foods. Those included processed foods and novel foods (e.g. GMOs). (...)"

(3) Example of a case of an incomplete declaration of interest

Alfonso Lampen

Working Group on MCPD and glycidyl esters (BIOCONTAM panel): Undeclared activities with ILSI

Alfonso Lampen is head of the Food Safety Division of the German food safety authority, the Institute for Risk Assessment (BfR). He held a position as chair of the ILSI "Advisory Group on 3-MCPD esters in Food Products".[24] Further, he acted as chair of an ILSI expert meeting on this

18 http://isbr.info/files/tinymce/uploaded/isbgmo12_all_abstracts/index.htm
19 https://web.archive.org/web/20160214145951/http://www.eigmo.info/
20 Roberts, A. F., Devos, Y., Lemgo, G. N., & Zhou, X. (2015). Biosafety research for non-target organism risk assessment of RNAi-based GE plants. Frontiers in plant science, 6. http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4635219/ http://www.cera-gmc.org/blog/roberts_rnai
21 Roberts, A., Devos, Y., Raybould, A., Bigelow, P., & Gray, A. (2014). Environmental risk assessment of GE plants under low-exposure conditions. Transgenic research, 23(6), 971-983. http://link.springer.com/article/10.1007/s11248-013-9762-z Devos, Y., Sanvido, O., Tait, J., & Raybould, A. (2014). Towards a more open debate about values in decision-making on agricultural biotechnology. Transgenic research, 23(6), 933-9. http://link.springer.com/article/10.1007/s11248-013-9754-z
22 https://ess.efsa.europa.eu/doi/doiweb/doisearch
23 https://web.archive.org/web/20130303022935/http://www.eigmo.info/
24 https://web.archive.org/web/20121220023110/http://www.ilsi.org/Europe/Pages/TF_ProcessCompounds.aspx

subject in 2011[25] and also was a member of the “Expert Group on Analytical Methods for Detection of 3-MCPD esters”[26] during this time. Currently, Lampen is involved with the same issues as a member of the EFSA Working Group on MCPD and glycidyl esters (BIOCONTAM panel).[27]

Further, he was member of the ILSI Food Allergy Expert Group - From Thresholds to Action Levels.[28] [29] Interestingly, Lampen's status as member of the expert group was changed later on. Whereas in the ILSI draft activity report for 2014, Lampen is listed as a full member, the currently available members list on ILSI's website only lists him as „observer“.
In Lampen's declarations of interest for the years 2014 and 2015, none of his ILSI activities are mentioned.[30] This comes as a surprise because his involvement with ILSI has previously been reported in different backgrounders (Then, C. & Bauer-Panskus, A., 2012; Bauer-Panskus, A., & Then, C., 2015) and was also reported in press articles and books. According to an ILSI publication from 2013[31], Lampen even got paid for his contribution to the organisation.
„Alfonso Lampen and Rüdiger Weisshaar received an honorarium from ILSI Europe for their participation in this review and reimbursement of their travel and accommodation costs for attending the related meetings.“

Altogether, the case of Alfono Lampen constitutes a breach of EFSA's policy of independence. According to EFSA's guidance on independence:
„Individuals subject to these rules only have to declare current activities and past activities that have taken place in the five years preceding the day of submission of the DoI.“[32]

A comparable case concerns Colin Crews, another member of the EFSA Working Group on MCPD and glycidyl esters (BIOCONTAM panel). He, too, was involved in the ILSI “Expert Group on Analytical Methods for Detection of 3-MCPD esters” as well as the ILSI “Expert Group on Mycotoxins”.[33] and is co-author of several ILSI publications[34] as well as author of a 2011 conference report on “MCPD and Glycidyl Esters in Food Products”.[35] In contrast to Alfonso Lampen, he has declared these interests.

25 http://www.ilsi.org/Europe/Pages/ViewItemDetails.aspx?WebId=84D7FA4A-0FD5-40CD-A49A-2DA6FCDFD654&ListId=0348EB34-DF85-49DD-9ADE-77ED136643F1&ItemID=271
26 https://web.archive.org/web/20121220023110/http://www.ilsi.org/Europe/Pages/TF_ProcessCompounds.aspx
27 https://ess.efsa.europa.eu/doi/doiweb/wg/680830
28 http://www.ilsi.org/Europe/Pages/Food-Allergy-Expert-Groups.aspx
29 http://www.ilsi.org/Europe/Features/ILSIEurope_Draft2014ActivityDoc_Oct2013.pdf
30 https://ess.efsa.europa.eu/doi/doiweb/doisearch
31 Crews, C., Chiodini, A., Granvogl, M., Hamlet, C., Hrnčiřík, K., Kuhlmann, J., ... & Jasti, P. R. (2013). Analytical approaches for MCPD esters and glycidyl esters in food and biological samples: a review and future perspectives. Food Additives & Contaminants: Part A, 30(1), 11-45. http://www.tandfonline.com/doi/abs/10.1080/19440049.2012.720385
32 http://www.efsa.europa.eu/en/sites/default/files/assets/independencerules2014.pdf (Decision of the Executive Director on Declarations of Interest)
33 https://web.archive.org/web/20121220023110/http://www.ilsi.org/Europe/Pages/TF_ProcessCompounds.aspx
34 http://onlinelibrary.wiley.com/doi/10.1002/mnfr.201100764/abstract http://www.tandfonline.com/doi/abs/10.1080/19440049.2012.720385
35 http://www.ilsi.org/Europe/Pages/ViewItemDetails.aspx?WebId=84D7FA4A-0FD5-40CD-A49A-2DA6FCDFD654&ListId=0348EB34-DF85-49DD-9ADE-77ED136643F1&ItemID=271

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