



**TEST  
BIOTECH**

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

To  
Mr Virginijus Sinkevičius  
Commissioner for Environment,  
Oceans and Fisheries

Brussels, 15 February 2023

Dear Commissioner

We became aware that Ms Dovilė Sandaraitė, who previously was employed by EuropaBio<sup>1</sup>, now acts as Media and Communications Adviser in your Cabinet<sup>2</sup>. This raises, with all respect, questions with regard to the standards of DG Environment for safeguarding its impartiality and tackling conflicts of interest.

As you know, the Commission is currently preparing a legislative proposal on the issue of new genomic techniques (NGTs). In this context, the trade association EuropaBio, due to its industry members and their particular interests, is trying to influence political decision-making to exempt NGT organisms from the mandatory approval processes as currently requested by the EU GMO regulation. In addition, DG Environment is also involved in decision-making on other topics which are of high relevance for EuropaBio such as Farm to Fork, the Green Deal, bioeconomy and pesticide reduction.

The Commission should avoid any close affiliation or undue influence by these particular interests, such as by carefully selecting its staff members. For us, the fact that your DG accepted a direct move from a position with EuropaBio to a position within your cabinet's communications department clearly is in contradiction to the due diligence which should be applied to protect the impartiality of the Commission. From a point of view of the public interest, these 'revolving doors' with big industry have to be shut down.

In particular, the EU staff regulation (2014) art.11 states that: *"...Before recruiting an official, the appointing authority shall examine whether the candidate has any personal interest such as to impair his independence or any other conflict of interest. To that end, the candidate, using a specific form, shall inform the appointing authority of any actual or potential conflict of interest. In such cases, the appointing authority shall take this into account in a duly reasoned opinion. If necessary, the appointing authority shall take the measures referred to in Article 11a(2). This Article shall apply by analogy to officials returning from leave on personal grounds."*<sup>3</sup>

In the past, within the EU, there were several cases of these 'revolving doors' (or direct collaboration with biotech industry) which caused institutions such as EFSA to improve their standards for independence. These include:

- 1 <https://www.linkedin.com/in/dovilesandaraitė/?originalSubdomain=be>
- 2 [https://www.contexte.com/actualite/environnement/virginijus-sinkevicius-a-une-nouvelle-conseillere-communication-et-presse\\_162283.html](https://www.contexte.com/actualite/environnement/virginijus-sinkevicius-a-une-nouvelle-conseillere-communication-et-presse_162283.html)
- 3 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:01962R0031-20140501&from=EN>

- In 2009, a direct move from leading EFSA staff expert to the company Syngenta was revealed.<sup>4</sup>
- From 2010 – 2012, it was shown that experts from ILSI (International Life Sciences Institute, a think tank sponsored by the food industry) were infiltrating EFSA on several levels.<sup>5</sup>
- In 2014 and 2016, lobby organisations of food producers tried to enter positions in EFSA.<sup>6</sup>
- In 2016 and 2018, close cooperation between EFSA and the biotech industry within the International Society for Biosafety Research (ISBR) was exposed by Testbiotech.<sup>7</sup>

In addition, within the last years, several cases of revolving doors<sup>8</sup> between the EU Commission and big industry became public, which have not been adequately dealt with. This was also stressed by the EU Ombudsman conclusion in May 2022 warning that the EU administration's integrity is at stake.<sup>9</sup>

We consider that it is important and urgent that DG Environment makes clear that high standards apply to its staff recruitment and that revolving doors with industry are no longer accepted.

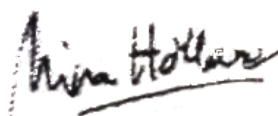
In this context, we kindly ask DG Environment to answer the following questions:

- Within DG Environment, which standards are established to close down or avoid 'revolving doors'?
- What conflicts of interest (if any) were declared by Ms Dovilė Sandaraitė when applying for the position?
- What was DG Environment's reasoned opinion on those and what assessment has been made by DG Environment about the risk to its decision-making and reputation of having a former industry insider in this role
- What are the official tasks for the work of Ms Dovilė Sandaraitė?
- Are there any obligations set for Ms Dovilė Sandaraitė not to get involved in topics such as NGT regulation, Green Deal, Farm to Fork, bioeconomy and pesticide reduction which all are of relevance to her previous employer? How will these obligations be monitored and implemented? How many meetings did DG Environment officials, the Environment Commissioner and his cabinet hold with EuropaBio or its members within the current term and which issues were discussed with these stakeholders?

With best regards,



Christoph Then  
Executive director of Testbiotech



Nina Holland  
Researcher at Corporate Europe Observatory

4 <https://www.testbiotech.org/en/content/leading-european-food-safety-authority-staff-member-moves-industry>

5 <https://www.testbiotech.org/en/press-release/testbiotech-reveals-conflicts-interest-european-food-safety-authority-efsa>, <https://www.testbiotech.org/en/press-release/efsa-playing-field-biotech-industry>, <https://www.testbiotech.org/en/press-release/efsas-revolving-door-biotech-industry-unacceptable>, <https://www.testbiotech.org/en/press-release/chair-management-board-efsa-quits-because-conflict-interests>,

6 <https://www.testbiotech.org/en/press-release/food-industry-lobbyists-be-appointed-board-eu-food-safety-authority>, <https://www.testbiotech.org/en/press-release/conflicts-interest-played-down-european-food-safety-authority-efsa>

7 <https://www.testbiotech.org/en/press-release/conflicts-interest-played-down-european-food-safety-authority-efsa>, <https://www.testbiotech.org/en/node/2236>

8 <https://corporateeurope.org/en/revolvingdoorwatch>

9 <https://www.ombudsman.europa.eu/nl/press-release/en/156070>