

EXECUTIVE DIRECTOR

Parma, 16 September 2011
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Ms Nina Holland
Corporate European Observatory
Rue d'Edimbourg, 26
1050 Brussels
Belgium

Mr. André Cicolella
Réseau Environnement Santé
Rue du Faubourg Saint-Denis, 148
75010 Paris
France

Re: Your letter and press release dated 13/09/2011

Dear Ms Holland, dear Mr Cicolella,

I have read your letter dated 13 September 2011 and the joint press release of the same day where the independence of some of the members of EFSA's Scientific Panel on Food Additives and nutrient sources added to food (ANS) is contested.

Regrettably, these documents are based on factual mistakes that put in a negative light EFSA's independence.

According to EFSA's Policy on Declarations of interest, the experts mentioned in your letter were not required to declare those activities, as they are not related to their Scientific Panel's field of activities.

Prof. Crebelli has not been a member of a scientific committee advising ILSI but rather participated in the scientific committee of a conference. The role of the scientific committee of a conference is screening abstracts and selecting the best papers and speakers for the conference and giving advice on the programme. Prof. Crebelli did not even attend the conference in question. Most importantly, the topic of that conference was food packaging, while that matter clearly falls outside the ANS Panel's remit.


For what concerns Prof. Gundert-Remy, she advised ILSI on general research topics, such as obesity, that fall clearly outside the scope of the ANS Panel.

Those activities cannot result in potential conflicts of interest. This means that contrary to your allegations the so called "breach of trust" procedure does not need to be commenced in the cases at issue here.

Lastly, your letter puts forward some proposals which I would like to comment as follows:

- **The recruitment of experts:** in selecting scientific experts, EFSA complies with the applicable legal framework.
- **The auditing of experts' declarations of interest and sanctions for EFSA:** EFSA's policy and rules on experts' declarations of interest are regularly subject to internal and external audits. Auditing bodies include external contractors and the Commission's Internal Audit Service. Since the implementation of the DoI Policy in 2007, an audit has been successfully performed every year. Next week, EFSA's DoI Policy and its implementing rules are subject to an audit by the Court of Auditors.
- **Transparency of internal procedures:** openness and transparency are two of the guiding principles that inform EFSA's daily activities. EFSA has imposed on its services an extremely high level of transparency. EFSA publishes all its outputs and background documents, minutes of its working groups, conferences, events, relevant correspondence, declarations of interests of all its scientific experts and of its management team, the conflicts identified and the measures taken to prevent the occurrence of those conflicts. However, EFSA's high standards of transparency encounter some limits in the applicable legal framework related for instance to personal data protection, regulatory data protection and confidentiality.

Yours sincerely,



Catherine Geslain-Lanéelle

Cc: Mr. John Dalli, Commissioner for Health and Consumer Policy
Mr. Maroš Šefčovič, Vice President of the European Commission in charge of inter-institutional relations and administration
Mr. Eoin O'Shea, Member of the European Court of Auditors