

ILSI Europe's comments on EFSA's draft Policy on Independence and Scientific Decision-Making Processes

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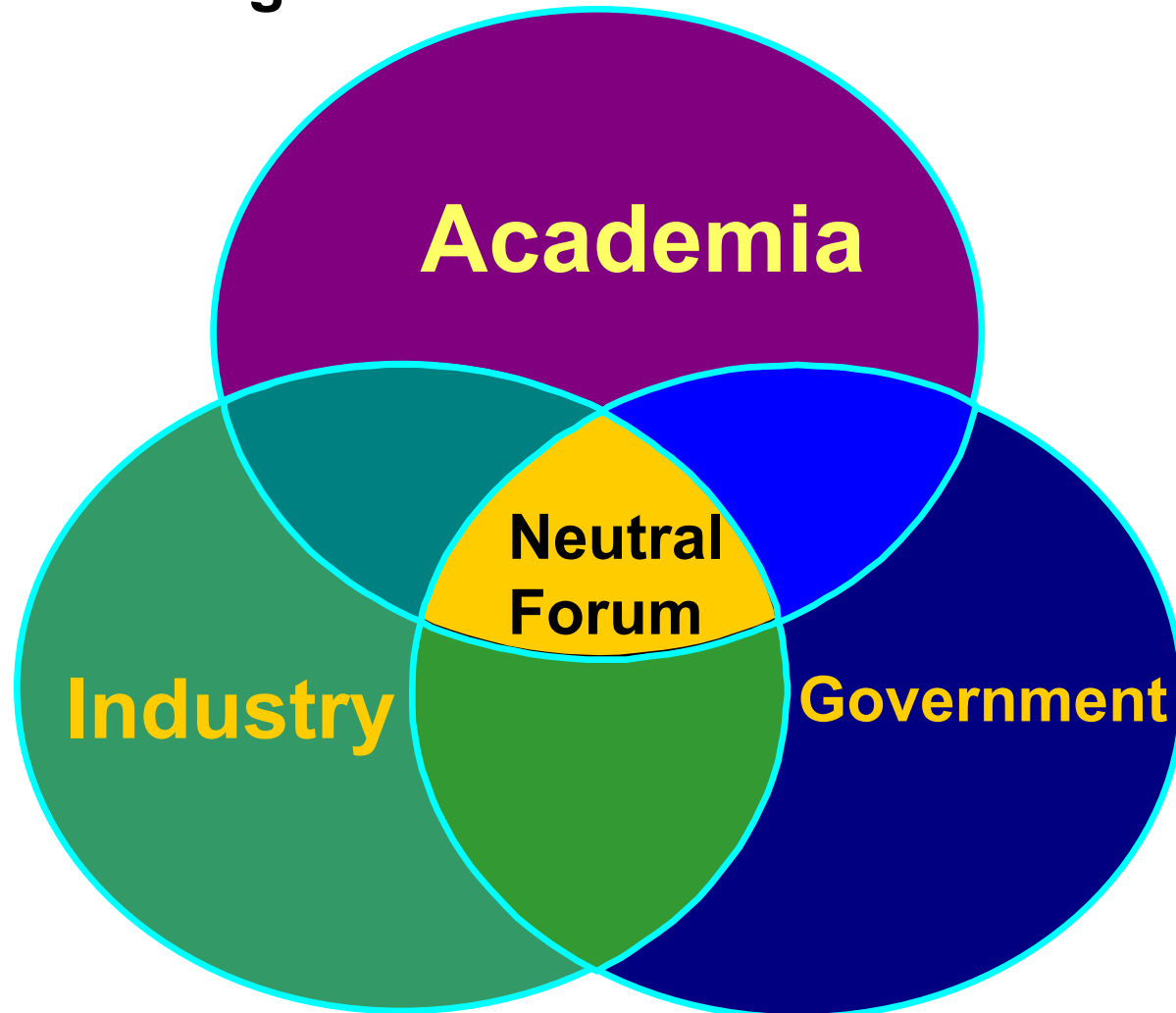
ILSI Europe

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- **Where do we come from?**
- **Comments**

ILSI's Mission

**To improve public health and safety
through advancement of science**



ILSI Europe's aims

- **To provide a unique platform for scientists from academia, government and industry to jointly advance the best available fact-based, objective science on public health topics**
- **To provide consensus-based scientific information on food and health, which is communicated widely**

Line 12-13

independence and quality

Suggestion: "...the Authority has to be a point of reference of risk assessment in the food chain by virtue of **the scientific and technical quality of the outputs it issues, its independence...**"

Line 27-28: “no matter what seems to be the right decision [...], it is essential that interested parties and the public at large are themselves convinced that decisions are sound”

Primary function of government should be to protect its citizens against **real** risks, not **perceived** risks

Consequently, **risk assessment resources should be focused on real risks**, whereas perceived risks should be addressed by education and communication

Line 68: “conflict of interest or is likely to be perceived as such by the public”

Key is, to protect against **real** conflicts of interest, not **perceived** conflicts of interest

Line 137-139: “Public-private partnerships are an established feature of research in the EU and worldwide and hence many of the scientific experts who contribute to EFSA will inevitably have links with the private sector.”

Suggest to strengthen the text by referring to the importance of PPP for:

- **Innovation** (e.g. OECD 2004)
- **European competitiveness**, stimulated by the „**fifth freedom**’ (**free circulation of researchers, knowledge and technology**) (ERA, European Council, 2008)
- **Human progress**