

Decision of the Executive Director of the European Food Safety Authority on Competing Interest Management



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DECISION

EFSA – European Food Safety Authority	Decision of the Executive Director on Competing Interest Management	Decision No.: EFSA/LA/MAR/IMPRUL_043_2025
	Effective Date: 28 March 2025	Supersedes: EFSA/LA/DEC/19568050/2018

Approvals	Signature	Name
Originator	Signature on the file	<i>Dirk Detken</i>
Acting Executive Director	See Decision	<i>Bernhard Url</i>

Introduction	See citations of the annexed Decision
Description	This decision lays down the rules to be followed by EFSA in order to manage competing interests, with the aim of preventing the occurrence of conflicts of interest, among the professionals involved in its Management Board, Scientific Committee, Scientific Panels, Working Groups, peer review meetings, networks, Advisory Forum and outsourcing schemes.
References	<p>Treaty on the Functioning of the European Union</p> <p>Charter of Fundamental Rights of the European Union</p> <p>Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as last amended</p>



	<p>Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union</p> <p>Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community</p> <p>Commission Regulation (EC) No 2230/2004 of 23 December 2004 laying down detailed rules for the implementation of European Parliament and Council Regulation (EC) No 178/2002 with regard to the network of organisations operating in the fields within the European Food Safety Authority's mission</p> <p>Commission Decision of 30.5.2016 establishing horizontal rules on the creation and operation of Commission expert groups, C(2016) 3301 final</p> <p>European Parliament resolution of 8 May 2008 on the development of the framework for the activities of interest representatives (lobbyists) in the European institutions</p> <p>EFSA's Policy on Independence adopted by the Management Board on 20 June 2024</p> <p>EFSA's Management Board Decision concerning the establishment and operation of the European Networks of scientific organisations operating in the fields within the Authority's mission</p> <p>Decision of the Executive Director of the European Food Safety Authority concerning Pesticides Risk Assessment Peer Review</p>
Revision history	27 March 2025: Adoption of the document superseding EFSA/LA/DEC/19568050/2018.
	13 November 2025: Correction of clerical errors.



ABBREVIATIONS

Authority	European Food Safety Authority
ADoIs	Annual Declarations of Interest
ODoIs	Oral Declarations of Interest
CoIs	Conflicts of Interest
DoIs	Declarations of Interest
EU	European Union
IT tool	Information Technology allowing the e-processing of DoIs
LA	EFSA Legal Affairs Services Unit
MoU	Memorandum of Understanding
PI	Public Institution



Decision of the Executive Director of the European Food Safety Authority on **Competing Interest Management**

The Executive Director of the European Food Safety
Authority has adopted the following decision



1. Scope and definitions

Article 1. Scope

1. This decision lays down the rules on the establishment and the implementation of a system for managing competing interests and ensuring the prevention of conflicts of interests within EFSA. It aims to contribute to EFSA's commitment to ensure that the scientific outputs produced by the Authority are trusted and compliant with the principles laid down in EFSA's policy on independence¹.
2. The rules set out in the present decision are addressed to all Concerned individuals as defined in Article 2(1)(I) below, unless specifically provided otherwise.

Article 2. Definitions

1. For the purposes of this decision:
 - a. **"Declaration of interest (DoI)"** means all structured information about engagements outside EFSA that potentially overlap with EFSA's assignments, and which is submitted by individuals subject to this decision in the context of its implementation and discharge or related duties;
 - b. **"Annual Declaration of Interest (ADoI)"** means the annual ² submission of written information by Concerned individuals using a format provided by EFSA;
 - c. **"Oral Declaration of Interest (ODOI)"** means the verbal declaration of relevant information to be made by Concerned individuals at the beginning of each meeting with respect to the items on the agenda of the meeting;
 - d. **"Interest"** means the objective relationship between a Concerned individual, or his or her Close Family Members, and a company, organisation, entity, product, business or other body (such as having a right or title, a claim, a share, a business engagement, a membership, a paid or unpaid involvement, etc.). The types of Interests taken into consideration in this decision are outlined under paragraph 2 of this Article;
 - e. **"Conflict of Interest (CoI)"** means any situation where a Concerned individual has an Interest that may compromise, or be reasonably perceived as compromising, his or her capacity to act independently and in the public interest in relation to the subject of the work performed at EFSA³;
 - f. **"Directly impacted"** or having a direct interest means that a legal or natural person has their application dossier or notification being actually or potentially the subject of an EFSA's scientific output. **"Indirectly impacted"** or having an indirect interest means that the activities of a legal or natural person make them concerned with the content of an EFSA's scientific output;
 - g. **"Experts"** means the members of EFSA's Scientific Committee, Scientific Panels, Working Groups, candidates having applied to the call for expression of interest published by EFSA pursuant to Article 28(5) of

¹ mb240620-a3– EFSA's policy on independence adopted by the EFSA Management Board on 20 June 2024.

² With regards to contractors, reference is made to Article 16 and relevant provisions therein (see footnote 23).

³ Article 2(4) of Commission Decision of 30.5.2016 establishing horizontal rules on the creation and operation of Commission expert groups, C(2016) 3301 final.



Regulation (EC) No 178/2002,⁴ and participants in peer review meetings⁵ also when appointed by, or representing, Member States' authorities, and excluding Hearing Experts and Observers, as defined in this Article 2(1)(j) and 2(1)(k);

- h. **"Network Members"** means members of EFSA's networks⁶, focal points or other networking activities carried out pursuant to Article 36 of Regulation (EC) No 178/2002⁷ (see Article 12);
- i. **"Members of EFSA Governance bodies"** means members of EFSA's Management Board and members of EFSA's Advisory Forum, (see Articles 13 and 14);
- j. **"Hearing Experts"** means individuals invited to provide their input to EFSA's work without having a decision making role therein, as per Article 15 of the *"Implementing Rule of the Management Board of the European Food Safety Authority laying down the rules on the selection, appointment and operations of the Scientific Committee, Scientific Panels and of their Working Groups"* (see Article 9);
- k. **"Observers"** means individuals who are neither Experts, Hearing Experts nor members of the EFSA Governance bodies, and who are permitted by EFSA to attend meetings and events organised by EFSA itself. Observers do not have the power to participate in the discussion nor to present their views or the data in their possession (see Article 10);
- l. **"Concerned individuals"** means Experts, Networks Members, members of EFSA's Governance bodies, Hearing Experts, staff of European Union Institutions, bodies or other agencies participating in EFSA's meetings in their private capacity and without prejudice to the Staff Regulations of the European Union, contractors and participants to grant awarding procedures⁸;
- m. **"Annual Earnings"** means all income (gross) that a Concerned individual earned in the fiscal year prior to the one in which the DoI is submitted, including, and not limited to, compensation, fees, honoraria, salaries, rents, sponsorships, fellowships, grants or other funding, pension rights, reimbursement of expenses, endowments and dividend yields. It does not include earnings paid to persons other than the Concerned individual or his or her Close Family Members dependent on him or her;
- n. **"Public Institutions (PI)"** means any organisation included in the list drawn up by EFSA's Management Board according to Article 2 of Commission Regulation (EC) 2230/2004⁹. It also means any other international, national, regional, local or academic institution, public authority, research institute or other body which carries out tasks related to EFSA's remit, pursues public interest objectives, and receives more than 50% of its budget from public entities;

⁴ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, OJ L 31, 1.2.2002, p. 1, as last amended.

⁵ As defined in the Decision of the Executive Director of the European Food Safety Authority concerning Pesticides Risk Assessment Peer Review, No 14461368 of 18 September 2015.

⁶ Pursuant to the EFSA's Management Board Decision concerning the establishment and operation of the European Networks of scientific organisations operating in the fields within the Authority's mission, mb210624-a4.

⁷ When networking activities under Article 36 are eligible for financial support reference is made to Article 15 of the present Decision.

⁸ Reference is made to Article 15(1) of the present Decision.

⁹ Commission Regulation (EC) No 2230/2004 of 23 December 2004 laying down detailed rules for the implementation of European Parliament and Council Regulation (EC) No 178/2002 with regard to the network of organisations operating in the fields within the European Food Safety Authority's mission, OJ L 379, 24.12.2004, p. 64–67.



- o. **"Close Family Member"** means:
 - i. a spouse, meant as the person engaged in the marital relationship with the Concerned individual;
 - ii. a partner with whom a Concerned individual has contracted a registered partnership, on the basis of the legislation of the relevant legal system;
 - iii. the direct descendants and ascendants who are financially dependent on the Concerned individual;
 - p. **"Contractors"** means individuals and entities selected through the procedures followed by EFSA to purchase services, works or goods, pursuant to its Financial Regulation, Title VII and Article 242 of Regulation (EU, Euratom) 2024/2509¹⁰;
 - q. **"Grants"** means financial support granted by a PI in accordance with the applicable legal framework, or by EFSA in accordance with Article 36 of Regulation (EC) No 178/2002, Commission Regulation (EC) No 2230/2004 or pursuant to Title VIII of Regulation (EU, Euratom) 2024/2509 and its rules of application;
 - r. **"Regulated Products"** means products, processes, organisms or substances submitted for evaluation by EFSA;
 - s. **"Public interest duty"** means a task, project, function or mission performed by a Concerned individual in the context of his or her engagement¹¹ with a PI, carried out for the benefit of the public and not for the benefit of a specific legal or natural person or association thereof;
 - t. **"Mandate"** means the scientific mandate on which the Scientific Committee, Panels, Working Groups or peer review meeting is, or is expected to be, involved;
 - u. **"EFSA's remit"** means the powers delegated to EFSA as per recital 36 and Article 22 of Regulation (EC) No 178/2002, or relevant sectoral EU food law.
2. For the purpose of declaring Interests as defined under paragraph 1, letter d, of this Article:
- I. **"Financial Investment"** means any economic stake or share in an entity with a direct or indirect interest falling within EFSA's remit, including its stocks, equities or bonds, or of one of the entity's subsidiaries or of a company in which it has a holding. **"Industry Financial Investments"** means any form of the above held in business operators directly or indirectly concerned by EFSA's outputs. Financial instruments on which the Concerned individual has no influence are not to be considered for the purposes of this decision.
 - II. **"Managerial Role"** means any participation, paid or unpaid, in the decision-making process (such as for example management board membership, directorship, executive committees membership and executives) of an entity with an interest falling within EFSA's remit. Any managerial role which contributes more than 5% to the Concerned individual's Annual Earnings, shall be considered as Occasional Consultancy. If it contributes more than 25%, it shall be considered as Employment.
 - III. **"Membership of a scientific advisory entity"** means any participation in a scientific advisory entity, paid or unpaid, other than those set up by EFSA,

¹⁰ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast), OJ L, 2024/2509, 26.9.2024.

¹¹ I.e. Managerial Role, Membership of a scientific advisory entity, Employment or Occasional Consultancy.



with a direct or indirect interest falling within EFSA's remit. Any membership of a scientific advisory activity which contributes more than 5% to the Concerned individual's Annual Earnings, shall be considered as Occasional Consultancy. If it contributes more than 25%, it shall be considered as Employment.

- IV. "Employment" means any form of occupation or business, part-time or full-time, paid or unpaid, including self-employment, with an employer or client directly or indirectly concerned with EFSA's remit, or any activity defined in paragraph 2(I-V) of this Article that contribute for more than 25% to the Concerned individual's Annual Earnings. "Industry Employment" means any Employment with companies, business operators, industry associations, lobbying organisations¹² and other corporate funded organisations directly or indirectly concerned by EFSA's scientific outputs.
- V. "Occasional consultancy" means providing advice or services, paid or unpaid, to companies, trade associations or other private bodies with an interest falling directly or indirectly within EFSA's remit. In case the consultancy contributes more than 25% to the Concerned individual's Annual Earnings, it shall be considered as Employment.
- VI. "Research Funding" means financial support, including grants, rents and reimbursement of expenses, sponsorships and fellowships, for research or developmental work managed by, or benefiting, the Concerned individual, and being provided by public or private entities. For each research activity carried out, Concerned individuals indicate in their DoI whether the percentage of funding received from the private sector during the two years preceding the submission of the DoI exceeds 25% of the total research budget relevant for the matter under consideration.
- VII. "Intellectual property rights" means patents, trademarks, inventorship, copyrights and/or other intellectual property rights, irrespective of whether they grant a financial gain, that are recognised by the applicable law and that fall directly or indirectly within EFSA's remit. It does not include authorship or publications.
- VIII. "Other memberships or affiliations" means any membership or affiliation with entities with an interest falling within EFSA's remit, including professional organisations, which does not fall under the other categories defined above and which is relevant for the purposes of this decision.
- IX. "Other relevant Interests" means any Interest, involving or not a financial transaction, including the receipt of prizes, gifts or awards in relation to matters falling within EFSA's remit, that does not fall under the categories defined above and which may be considered as a source of CoI pursuant to this decision.

Article 3. Requirements for a complete Declaration of Interest

1. Concerned individuals are required to submit true, accurate and up to date DoIs, without prejudice to EFSA's right to perform audits and checks on the information received, also on a case-by-case basis.
2. Concerned individuals declare past or current activities. Past activities are declared if they have taken place within five years preceding the date of submission of the DoI.

¹² European Parliament resolution of 8 May 2008 on the development of the framework for the activities of interest representatives (lobbyists) in the European institutions (2007/2115(INI)) 2009/C 271 E/06.



3. Concerned individuals submitting DoIs provide all relevant details on the subject matter of each declared Interest. They indicate the sector in which the activity is or was carried out, clarify the exact Interest and role of the entity or organisation of relevance for each Interest and specify their precise role within that entity or organisation. Concerned individuals also provide other information relevant for performing the screening of the DoI, including the information to be submitted to calculate the impact of each interest on their Annual Earnings and clarifications that may be requested by EFSA in the context of the implementation of this decision.

Article 4. Annual Declaration of Interest

1. Concerned individuals are requested to submit the ADoI according to the rules set out in this decision and do so by submitting it through the dedicated IT tool or, in exceptional circumstances, by filling the form provided by EFSA.
2. To this extent EFSA constantly monitors IT advancements and regularly upgrades the dedicated IT tool to allow further automatization to support the processing of ADoIs. EFSA is committed to facilitate the submission of ADoIs for concerned individuals by increasing binary options, as well as reducing length of the processing of DoIs by limiting duplication of information and activities.
3. Any Concerned individual updates his/her ADoI without delay and in any case within 45 calendar days following any change in his/her Interests. With the exception of omissions resulting from force majeure, failure to do so is considered an omission pursuant to Article 19 below.
4. The ADoI is used by EFSA to decide on the Concerned individual's eligibility with respect to his/her involvement regarding the relevant EFSA activity.

Article 5. Oral Declaration of Interest

1. Concerned individuals declare orally at the beginning of each meeting any Interest not already declared which might be considered prejudicial to their independence with respect to the items on the agenda of the meeting.
2. The ODoI is used to identify whether the Concerned individuals should or not be excluded from the discussion of a specific item on the agenda or from participating in a specific meeting.
3. Any ODoI shall be recorded in the minutes of that meeting in the section dealing with the outcome of EFSA's screening of Interests.

2. Rules applicable to Experts

Article 6. Annual Declaration of Interest

1. At least once every year, and in any case within 45 calendar days following any change in his/her Interests, Experts declare their Interests, as defined in Article 2, by submitting an ADoI in accordance with Articles 3 and 4.
2. Without prejudice to the Staff Regulations of the European Union, staff of European Union institutions, bodies or agencies participating as members in the meetings of EFSA's scientific groups are subject to DoI related requirements as set out in this decision.



Article 7. General principles of screening of Experts' Interests

1. The identification and prevention of CoIs are based on the evaluation of the ADoI and, where appropriate, of the ODoI given by the Expert.
2. Without prejudice to the application of the general principle referred to in paragraph 4 of this Article, Interests are screened by EFSA by considering whether they are compatible with the tasks to be assigned to the expert, and with regards to the Mandate in which the relevant Scientific Panel, Working Group, Peer Review meeting or the Scientific Committee shall perform its activity.
3. EFSA considers the review, assessment or rating by Experts of their own work as a CoI incompatible with the Experts' participation to these activities. The concept of "work" should be meant as inclusive of publications, papers, data, studies, results or scientific opinions, with the exception of those adopted by EFSA's scientific groups.
4. Current Industry Employment or current Industry Financial Investments are considered incompatible with membership of EFSA's Scientific Committee, Scientific Panels, Working Groups or participation in peer review meetings.¹³
5. The following activities are deemed incompatible with membership of the relevant Scientific Committee, Scientific Panel(s), Working Group(s) and peer review meeting(s) when they regard the Mandate of the scientific group: Managerial roles, Employment, Occasional Consultancy and membership of Scientific Advisory Bodies with non PIs. Research Funding from the private sector exceeding 25%¹⁴ of the funding relevant for the scientific group also results in the incompatibility with membership of the relevant group.¹⁵ These incompatibilities are applicable to the activities performed in favour of non-PIs, or with respect to activities not performed by the Expert in the exercise of Public Interest Duties, or carried out in the performance of risk management functions, and last for two years after the competing activity has ended.¹⁶
6. Activities carried out within PIs as part of Public Interest Duties, including teaching or research, do not constitute a CoI under this decision. An exception to the above concerns the risk management functions that are ongoing, or terminated in the two years prior to DoI submission, and that are performed with PIs on the same subject discussed in the EFSA scientific groups.
7. Activities with PIs that are unrelated to Public Interest Duties are assessed and validated as per the rules set out in this Article and presented in a tabular manner in Annex 1.
8. For the purpose of screening DoIs and evaluating thresholds for employment, occasional consultancy, managerial activity or membership of a scientific advisory entity, all Annual Earnings coming from the same entity shall be considered as a single entry, also when registered under different forms or activities.
9. The screening of interests of Close Family Members is performed as for interests of the experts submitting the DoI, except for:
 - a. paragraph 3, which shall not apply to Close Family Members,

¹³ Paragraph 3.1 of EFSA's policy on independence.

¹⁴ Paragraph 3.4 of EFSA's policy on independence.

¹⁵ See Annex 1 for details on calculation.

¹⁶ Paragraph 3.2 of EFSA's policy on independence.



- b. paragraph 4, which shall apply to Close Family members only when the activities overlap with the subject matter of the EFSA scientific group.
10. No EFSA assignment shall be declared or considered to be a source of CoI.
11. Memberships, affiliations or other relevant Interests not specifically addressed in Annex 1, shall be screened on a case-by-case basis, taking into consideration the general principles set out in this Article and the rationale behind EFSA's policy on independence.
12. By way of derogation from paragraph 5, past activities classified as employment, managerial roles, scientific advisory roles, consultancy with, or Research Funding exceeding 25% from, non-PIs held by participants in peer review meetings are compatible with membership of these meeting(s) if the expert has an ongoing employment with a PI. The same derogation from paragraph 5 shall apply to interests held by Close Family Members of participants in peer review meetings. Paragraph 5 shall instead apply to participants in peer review meetings holding interests related to dossiers submitted by legal or natural persons with whom they, or their Close Family Members: a. were employed; b. held managerial or scientific advisory positions or; c. to whom they tendered advice, in the two years prior to DoI submission.

Article 8. Screening process of Experts' DoIs

1. The officer identified as responsible by the relevant working instructions performs the assessment of the ADoIs according to the criteria set out in Article 7 and presented in a tabular format under Annex 1, and sends them to LA along with the result of the assessment. LA carries out the validation of the assessment of the ADoIs according to the same set of criteria.
2. Before starting the discussion of any of the items on the agenda of the meeting, the officer identified as responsible by the relevant working instructions performs the screening of the ODoIs in accordance with the criteria laid down in Annex 1, and in the light of the principles set out in Article 7 above.

3. Rules applicable to Hearing Experts and Observers

Article 9. Hearing Experts

1. Hearing experts are invited because they are in the possession of specific information, data, expertise or knowledge which is considered by EFSA instrumental to achieving the desired level of accuracy and completeness of the relevant scientific output.
2. Hearing Experts submit an ADoI in advance of a meeting to which they are invited. In view of their role as described in paragraph 4 no DoI screening, assessment or validation is performed for ADoIs submitted by Hearing Experts. ADoIs of Hearing experts are submitted and published to ensure an adequate level of transparency about their participation in respective meetings.
3. Participation to the meeting in the previous paragraph is permitted only if the Hearing Expert has submitted an ADoI.
4. Hearing Experts do not perform tasks which are the responsibility of the members of the EFSA scientific group. They may present topics and answer



questions, may not draft or be involved in the discussion or the adoption of a scientific output, may not vote, chair the meetings or be a rapporteur.

Article 10. Observers

1. Observers are not required to submit DoIs.

Article 11. Staff of Union institutions, bodies or agencies

1. Without prejudice to the Staff Regulations of the European Union, staff of EU institutions, bodies or agencies attending the meetings of EFSA's scientific groups as Observers or Hearing Experts are not required to submit DoIs.

4. Rules applicable to Network Members

Article 12. Network Members

1. Network Members shall declare their Interests as defined in Article 2(1)(d) by submitting an ADoI in accordance with Article 4 above. No screening, assessment or validation is performed by EFSA.
2. MoUs between EFSA and PIs specify applicable standards.
3. EFSA follows-up on serious and well documented cases of CoI substantially affecting the work of the EFSA's network or EFSA's reputation that are brought to its attention or that emerge through EFSA's specific annual check of the DoIs submitted. In this event, the Executive Director shall submit the issue to the Management Board which may ask the competent Member State to replace the Concerned individual.

5. Rules applicable to members of EFSA's Governance Bodies

Article 13. Members of the Management Board

1. Members of the EFSA Management Board shall declare their Interests as defined in Article 2(1)(d) by submitting an ADoI in accordance with Article 4 above.
2. The Management Board members shall declare orally at the beginning of each meeting any newly emerging Interest or a modification of an already declared one.
3. Upon advice of the EFSA Ethics Advisor, EFSA's Executive Director carries out the assessment of the interests declared by the members of the Management Board taking due account of the decisions appointing them and of the function of the Board with respect to EFSA's scientific processes. The assessment may result in the adoption of preventive measures, including the exclusion of the concerned member from discussing or voting on specific items in agenda.
4. Management Board members may express observations to the Executive Director for his/her consideration.



5. If a CoI which substantially affects the work of the Board or EFSA's reputation is not resolved by the concerned member without delay or by the adopted preventive measures, the Board may ask for the replacement of the concerned member pursuant to Article 17 of its Rules of Procedure.¹⁷
6. For two years after their mandate as members of the Management Board has expired, the former Board members shall inform EFSA of any professional engagement overlapping with EFSA's mission or tasks.
7. In relation to the representatives of the European Commission and of the EFTA Surveillance Authority paragraph 6 applies only in case their employment at the European Commission or at the EFTA Surveillance Authority ceases within the following two years from the expiry of their term of office as Board members.

Article 14. Members of the EFSA Advisory Forum

1. Members of the EFSA Advisory Forum shall declare their Interests as defined in Article 2(1)(d) by submitting an ADoI in accordance with Article 4 above.
2. EFSA follows up on serious and well documented cases of CoI substantially affecting the work of the EFSA's Advisory Forum or EFSA's reputation that are brought to its attention or that emerge through EFSA's specific annual check of the DoIs submitted. In this event, the Executive Director shall submit the issue to the Management Board, which may ask the competent Member State to replace the concerned individual.

6. Procurement and grant awarding procedures

Article 15. Screening of Declaration of Interest in the context of Grant awarding procedures

1. Absence of conflicts of interest in the context of grant awarding procedures is ensured in accordance with the EU Financial Regulation. In this respect, natural persons taking part in EFSA's grant awarding procedures concerning EFSA's risk assessment work equivalent to that performed by EFSA's Working Groups, such as preparing scientific opinions to be peer-reviewed by the Scientific Panels¹⁸, are required to submit a true, accurate and up to date DoI using the Form provided by EFSA and by declaring their Interests as defined in Article 2(1)(d) in accordance with Article 4 above. They shall update the DoI annually and every time a new interest emerges or an already declared one changes.
2. A DoI is submitted by each of the members of the team the Grant applicant is proposing to work on the project connected to the Grant. DoIs submitted according to paragraph 1 are assessed and validated according to the criteria set out in Article 7 of this Decision and presented in a tabular format under Annex 1. In particular, the Authorising Officer identified as responsible by the relevant working instructions performs the assessment of the DoIs according to the criteria set out in Article 7 and presented in a tabular format under Annex 1, and sends them to LA along with the result of the assessment. LA carries out the validation of the assessment of the ADoIs according to the same set of criteria.

¹⁷ mb221006-a2 – Management Board Rules of Procedure adopted by the EFSA Management Board on 6 October 2022.

¹⁸ Article 28(5)(e) of Regulation (EC) No 178/2002, op. cit.



3. Grants awarding procedures relating to work not equivalent to that carried out by EFSA's Working Groups do not require submission of DoIs in accordance with Article 3 of EFSA's Policy on Independence. In particular, the inclusion of competent organisations designated by Member States in the Article 36 list¹⁹ ensures the independence in the performance of the outsourced work²⁰.

Article 16. Screening of Declarations of Interest of contractors

1. Independence of contractors is regulated by the EU Financial Regulation. Professional conflicting interests relate to situations in which the previous or ongoing professional activities of an economic operator affect or risk affecting its capacity to perform a contract in an independent, impartial and objective manner²¹.
2. The existence of professional conflicting interest is assessed on the basis of the information and of the relevant Declaration²² submitted by the contractors, in compliance with the requirements set in the EU Financial Regulation²³, having also regard to the principles set out by the present Decision.
3. Each natural person called to perform the tasks contracted out by EFSA shall submit a true, accurate and up to date DoI using the Form provided by EFSA, that will be screened in accordance with the EU Financial Regulation²⁴, read in combination with the principles set out by the present Decision and the criteria set out in Annex 2. To this end, DoIs are screened having regard to the subject of the call.
4. The DoIs are validated by the Authorising officer identified as responsible by the relevant working instructions.
5. If the responsible Authorising Officer considers that a contractor and/or (a) natural person(s) called to perform a contract are in situations which affect or risk affecting their capacity to perform a contract in an independent, impartial and objective manner, in accordance with the EU Financial Regulation, having also regard to the principles set out by the present Decision, they shall be rejected, unless appropriate measures are taken to resolve such situations within a set deadline in accordance with the provisions and procedures established in the EU Financial Regulation.

7. Implementation and enforcement

Article 17. Coordination and implementation

1. The internal assignment of tasks and responsibilities for the implementation of this decision is set out in standard operating procedures and working instructions implementing the principles of centralized handling and coordination and of

¹⁹ Article 2(2) of Commission Regulation (EC) No 2230/2004, op. cit.

²⁰ Article 1(b) of Commission Regulation (EC) No 2230/2004, op. cit.

²¹ Article 2(56) of Regulation (EU, Euratom) 2024/2509, op. cit.

²² Reference is made to Article 20 concerning the technical and professional capacity of Annex I to the Regulation (EU, Euratom) 2024/2509, op. cit.

²³ Reference is made to recital 166 concerning the implementing guidance, Articles 143(d) concerning rejection from an award procedure, 170(1)(c) concerning award of contract, recital 167 and Article 18.4 of Annex I concerning the declaration on the absence of conflicts of interest and Article 20 concerning the technical and professional capacity of Annex I to Regulation (EU) 2024/2509, op. cit.

²⁴ Reference is made to footnote 22.



functional separation of responsibilities between the provision of scientific advice and decision-making power in competing interest management.

Article 18. Review of the decisions

1. If a specific complaint is filed against a decision taken under the rules set out in this decision, or if reconsideration of a decision is deemed appropriate to address an error, the Executive Director may review that decision.
2. The decisions taken under these rules may be brought to the attention of the European Ombudsman for alleged maladministration pursuant to article 228 of the Treaty on the Functioning of the European Union (TFEU) or may be challenged before the General Court of the European Union at the conditions set out in Article 263 TFEU.

Article 19. Compliance and veracity checks and omissions by Experts

1. Twice a year, EFSA shall check, also by means of outsourcing the procedure to a contractor, the compliance and the veracity of a random sample of DoIs submitted in the context of this decision by Experts, contractors and grant beneficiaries, and make the outcome of this exercise publicly available.
2. In the framework of this check, EFSA may require from any Concerned individual his/her declaration of personal income for tax purposes, as well as relevant documentation supporting the details provided in the relevant DoI in order to check the veracity of the information declared therein.
3. If EFSA becomes or is made aware of information that is not consistent with, or that is missing from, the DoI of a Concerned individual, and if a preliminary assessment of this information suggests that it concerns an Interest that should have been declared pursuant to Articles 1 to 7 of this decision, EFSA shall seek additional information from the Concerned individual and ask him or her to update his or her DoI and to include the missing information.
4. Once the Concerned individual has completed this update, EFSA shall screen the DoI in accordance with this decision.

Article 20. Process regarding breaches of EFSA's rules on CIM by Experts

1. The omission of information that would have resulted in a CoI is considered a breach of these rules.
2. In the event of an ascertained breach of the rules, the Management Board for members of the Scientific Committee or Scientific Panel, or the Executive Director for members of Working Groups or of participants to peer review meetings, applies one of the following measures:
 - a. Reprimand letter;
 - b. Suspension from participation in any EFSA activity, with corresponding suspension of any compensation therefrom, for a period of 6 months up to a maximum period of 1 year, without dismissal from the relevant body or scientific group;
 - c. Dismissal from the relevant body or scientific group, which may or may not be combined with a prohibition on participating in further EFSA activities for a period of 1 year up to a maximum period of 10 years.



3. To identify the measure to be applied, the Management Board or the Executive Director, respectively, shall take into account the following criteria:
 - a. Subjective element of the conduct (wilful misconduct vs. negligence);
 - b. Importance of the Interest as a source of influence on the Expert's scientific positions;
 - c. Financial impact on the Annual Earnings of the non-declared Interest pursuant to Article 2(1)(litt. m) of this decision;
 - d. Role of the relevant Expert within the scientific group;
 - e. Timing of the omission (Interest already existing at the time of the DoI vs. Interest arising later and not promptly declared) and delay in declaring.
4. If a measure under letters b. and c. of paragraph 2 of this Article is applied, EFSA shall perform a review of the scientific output(s) to which the Expert in question contributed. EFSA shall clarify whether, and the extent to which, that Expert influenced the outputs adopted by the EFSA group(s) in which he or she participated.
5. EFSA shall report the audit findings to the Executive Director, and to the Audit Committee of the Management Board. The Executive Director shall take all measures that are deemed fit to address these findings.
6. At least once a year, EFSA shall report to the Audit Committee of its Management Board on the findings identified in application of this Article, and on other relevant cases resulting from the implementation of this decision.

Article 21. Granting of waivers

1. This Article only applies to members of EFSA's Working Groups²⁵ and peer review meetings.²⁶
2. When EFSA identifies a CoI concerning an Expert wanting to participate in a Working Group, the secretariat of the Working Group shall carry out a search for an alternative Expert. Exceptionally, where no suitable alternative Expert is found, the officer responsible for the DoI assessment may request the issuing of a waiver in respect of the Expert with the identified CoI, by submitting to the Executive Director a detailed report outlining the reasons supporting the request.
3. Such a waiver may only be granted exceptionally by the Executive Director when the following cumulative conditions are met: (i) the expertise of the concerned Expert is found to be essential for the completeness of the draft output; (ii) when no suitable alternative Expert could be identified in light of the specific expertise possessed by the concerned Expert; (iii) and when the Expert's contribution could not be handled through his or her participation as Hearing Expert.
4. No waivers shall be granted to Experts with a current Industry Employment or with a current Financial Investment in an entity impacted by EFSA's outputs.
5. Waivers are recorded in the minutes of the meeting(s) and in the ensuing scientific output.

²⁵ mb221006-a5 – Implementing Rule of the Management Board of the European Food Safety Authority laying down the rules on the selection, appointment and operations of the Scientific Committee, Scientific Panels and of their Working Groups adopted by the Management Board on 6 October 2022.

²⁶ Decision of the Executive Director of the European Food Safety Authority concerning Pesticides Risk Assessment Peer Review, No 14461368 of 18 September 2015.



6. If a waiver is granted, the concerned Expert is invited to take part in the discussions and in the drafting phase of the scientific output. Experts to whom a waiver has been granted are not eligible for chairmanship, vice-chairmanship and may not be appointed as rapporteur.

8. Common rules

Article 22. Advisory Committee

1. At any point, EFSA may consult or refer a matter to an internal Committee with the responsibility of reviewing and advising on assurance and independence related matters.
2. The Committee shall meet at least twice a year and shall be in charge of:
 - a. validating the findings of compliance performed pursuant to Article 19 of this decision;
 - b. advising on key operational decisions regarding the implementation of the independence related regulatory framework.

Article 23. Training

1. EFSA shall ensure that all staff members implementing this decision, and the Concerned individuals receive induction training on how to comply with this decision. In particular, EFSA shall ensure that all responsible officers, identified by the relevant working instructions as responsible for the screening of DoIs are properly trained on the content of EFSA policy on independence, of this decision and of all the relevant working instructions.
2. For this purpose, EFSA shall implement training for all responsible officers and members of its Scientific Committee and Scientific Panels, document and keep track of attendance, and keep on hand at all times an advisor to answer questions or clarify doubts from the Concerned individuals about how the rules should be implemented. EFSA shall also make available working instructions and supporting materials to Working Group members and participants to peer review meetings.

Article 24. Transparency

1. In accordance with EFSA's policy on independence, EFSA shall make publicly available on its institutional website *inter alia*:
 - a. ADoIs of: (i) members of EFSA's Management Board; (ii) members of EFSA's Advisory Forum; (iii) members of Operational Management Team composed as indicated on EFSA's website; (iv) members of its Scientific Committee or Scientific Panels, Working Groups, participants in peer review meetings, including when appointed by, or representing, Member States' authorities, or members of its networks; (v) Hearing Experts; (vi) natural persons taking part in EFSA's grant awarding procedures in accordance with Article 15(1).
 - b. The Consolidated Annual Report, which shall include information about independence-related activities of EFSA (including number of DoIs screened, CoIs prevented, breaches of the rules confirmed, the relevant measures applied under Article 20 and the outcome of the compliance and veracity checks performed as per Article 19);



- c. MoUs signed by EFSA with PIs;
- d. The list of PIs;
- e. A register of activities undertaken by former members of EFSA's Management Board for two years after their term of office has ended.
- f. The specification, in the meeting minutes of the relevant EFSA's scientific group and in the respective scientific output, of the review by the EFSA's scientific group(s) of the outsourced work.

Article 25. Protection of personal data

1. EFSA processes all DoIs pursuant to Regulation (EU) No 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC²⁷.
2. The purpose of the data processing is to safeguard the independence of EFSA and its various bodies.
3. The legal basis for DoI processing is provided in:
 - a. Articles 22, 28, 36, 37 and 38 of Regulation (EC) No 178/2002;
 - b. For DoIs of contractors and participants in grant awarding procedures, Articles 2(56) and 143 of Regulation (EU Euratom) No 2024/2509.
4. The EFSA's Executive Director is the controller for handling of the DoIs.
5. The recipients of the DoIs are the persons and bodies identified in this decision, without prejudice to the publicity requirement specifically regarding ADoIs laid down in Article 38(1) litt. (e) of Regulation (EC) No 178/2002. Furthermore, DoIs may be transferred to bodies in charge of monitoring or inspection in conformity with EU Law, including the European Court of Auditors, the Internal Audit Service, the European Anti-Fraud Office, the European Ombudsman and the European Data Protection Supervisor.
6. The conservation period for DoIs per category of data subjects is 10 years from the date of submission of the relevant DoI.
7. Concerned individuals have the right to access their DoI and to update or correct it at any time. To meet this requirement, the DoI IT tool, available upon username/password authentication, is permanently accessible to Concerned individuals. If EFSA is aware of information that is not consistent with the declared interest, or of the failure to submit a DoI, the Concerned individual shall be contacted with the purpose of updating the DoI with the missing information. If an internal breach of the rules procedure is opened, the Concerned individuals shall be notified without delay.
8. Concerned individuals are also entitled to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>.

²⁷ OJ L 295, 21.11.2018, p. 39–98.



Article 26. Entry into force

1. The present decision shall enter into force on 27 March 2025, thereby repealing and replacing Decision EFSA/LA/DEC/19568050/2018 and shall be applicable as of 28 March 2025.
2. The Executive Director shall review this decision by 1 December 2027, and at least every two years thereafter. As part of each review, the Executive Director shall determine whether any adjustment to this decision is appropriate. The Executive Director shall communicate to the Management Board the rationale and results of such review, and the justification for any such adjustment.

Done in Parma on 28 March 2025

SIGNED

Bernhard Url
Acting Executive Director

Annexes:

- Annex 1: General principles and Screening Criteria for Experts' ADoIs and ODoIs.
- Annex 2: Screening Criteria of the DoIs submitted by contractors.
- Annex 3: Template of Declaration of Interest form to be used by concerned individuals.



ANNEX 1

General Principles and Screening Criteria for Experts' ADoIs and ODoIs.

ASSESSMENT APPROACH

Unconditional restrictions Interests are considered incompatible with the involvement in any EFSA scientific activity (not applicable to interests held by Close Family Members)	Qualified restrictions Interests are screened by EFSA by considering whether they are compatible with the tasks to be assigned to the Expert, with regard to the mandate of the relevant group/panel
<ul style="list-style-type: none"> ■ Current financial investments in "Industry" concerned with EFSA's outputs ■ Industry employment as described in Article 2(2)(IV) of this decision 	<ul style="list-style-type: none"> ■ Managerial Roles ■ Membership of scientific advisory entities ■ Employment in organisations other than food/feed industries ■ Occasional Consultancy ■ Research funding ■ Intellectual property rights ■ Other membership or affiliations ■ Other relevant interests



REVIEW OF SCIENTIFIC WORK

		ADoI Scientific Committee, Panels, Working Groups and peer review meetings		ODoI Scientific Committee, Panels, Working Groups and peer review meetings	
		Eligibility Chair & Vice- chair	Eligibility Member	Participation in meeting when review of Expert's work is not in agenda	Participation in meeting when review of expert's work is in agenda
Assessment, rating or review of Expert's own work	which constitutes a part of the publications, opinions, paper, study, test or protocol which the mandate requires to review	YES	YES	YES	NO
	which is the only one to be reviewed or constitute the main subject of the mandate	NO	NO	NO	NO



EXPERTS' DOI SCREENING CRITERIA

Declared interest		Time since declared interest ended (in years)	ADoI Scientific Committee, Panels, Working Groups and peer review meetings		ODoIS Scientific Committee, Panels, Working Groups and peer review meetings	
			Eligibility Chair & Vice-chair	Eligibility Member	Participation, when interest not overlapping with agenda item(s)	Participation, when interest overlapping with agenda item(s)
FINANCIAL INVESTMENTS in food or feed Industry		Current interest	NO	NO	NO	NO
		Past from 0 to 2 years	YES	YES	YES	YES
		Past from 2 to 5 years	YES	YES	YES	YES
MANAGERIAL ROLE MEMBERSHIP of a SCIENTIFIC ADVISORY ENTITY, OCCASIONAL CONSULTANCY with entities other than PI	Not overlapping with mandate of the scientific group	Current interest	YES	YES	YES	NO
		Past from 0 to 2 years	YES	YES	YES	YES
		Past from 2 to 5 years	YES	YES	YES	YES
	Overlapping with mandate of the scientific group	Current interest	NO	NO	NO	NO
		Past from 0 to 2 years ²⁸	NO	NO	NO	NO

²⁸ By way of derogation from Article 7(5), past activities classified as employment, managerial roles, scientific advisory roles, consultancy with, or Research Funding exceeding 25% from, non-PIs held by participants in peer review meetings are compatible with membership of these meeting(s) if the expert has an ongoing employment with a PI. The same derogation from Article 7(5) shall apply to interests held



Declared interest		Time since declared interest ended (in years)	ADoI Scientific Committee, Panels, Working Groups and peer review meetings	ODoIS Scientific Committee, Panels, Working Groups and peer review meetings		
			Eligibility Chair & Vice-chair	Eligibility Member	Participation, when interest not overlapping with agenda item(s)	Participation, when interest overlapping with agenda item(s)
		Past from 2 to 5 years	YES	YES	YES	YES
EMPLOYMENT with food or feed Industry or other lobbying organisations directly or indirectly concerned by EFSA's scientific outputs		Current interest	NO	NO	NO	NO
		Past from 0 to 2 years ²⁸	NO	NO	NO	NO
		Past from 2 to 5 years	NO	YES	YES	YES
EMPLOYMENT with entities other than food/feed Industry and PI	Not overlapping with mandate of the scientific group	Current interest	YES	YES	YES	NO
		Past from 0 to 2 years	YES	YES	YES	YES
		Past from 2 to 5 years	YES	YES	YES	YES

by Close Family Members of participants in peer review meetings. Article 7(5) shall instead apply to participants in peer review meetings holding interests related to dossiers submitted by legal or natural persons with whom they, or their Close Family Members: a. were employed; b. held managerial or scientific advisory positions or; c. to whom they tendered advice, in the two years prior to DoI submission.



Declared interest			Time since declared interest ended (in years)	ADoI Scientific Committee, Panels, Working Groups and peer review meetings		ODoIS Scientific Committee, Panels, Working Groups and peer review meetings	
				Eligibility Chair & Vice-chair	Eligibility Member	Participation, when interest not overlapping with agenda item(s)	Participation, when interest overlapping with agenda item(s)
	Overlapping with mandate of the scientific group		Current interest	NO	NO	NO	NO
			Past from 0 to 2 years ²⁸	NO	NO	NO	NO
			Past from 2 to 5 years	NO	YES	YES	YES
MANAGERIAL ROLE, SCIENTIFIC, MEMBERSHIP of a SCIENTIFIC ADVISORY ENTITY, OCCASIONAL CONSULTANCY, EMPLOYMENT with PI	Public interest duty (no Risk Management tasks)		Current interest	YES	YES	YES	YES
			Past from 0 to 2 years	YES	YES	YES	YES
			Past from 2 to 5 years	YES	YES	YES	YES
	Public interest duty	Not overlapping	Current interest	YES	YES	YES	NO



Declared interest			Time since declared interest ended (in years)	ADoI Scientific Committee, Panels, Working Groups and peer review meetings		ODoIS Scientific Committee, Panels, Working Groups and peer review meetings	
				Eligibility Chair & Vice-chair	Eligibility Member	Participation, when interest not overlapping with agenda item(s)	Participation, when interest overlapping with agenda item(s)
	(Risk Management tasks) or Non-public interest duty	with mandate of the scientific group	Past from 0 to 2 years	YES	YES	YES	YES
			Past from 2 to 5 years	YES	YES	YES	YES
		Overlapping with mandate of the scientific group	Current interest	NO	NO	NO	NO
			Past from 0 to 2 years	NO	NO	NO	NO
			Past from 2 to 5 years	YES	YES	YES	YES
RESEARCH FUNDING not linked to the mandate of the scientific group			Current interest	YES	YES	YES	YES
			Past from 0 to 2 years	YES	YES	YES	YES
			Past from 2 to 5 years	YES	YES	YES	YES
RESEARCH FUNDING linked to the mandate of the scientific group	Private funds < or = 25%	Current interest	YES	YES	YES	YES	
		Past from 0 to 2 years	YES	YES	YES	YES	
		Past from 2 to 5 years	YES	YES	YES	YES	
	Private funds > 25%	Current interest	NO	NO	NO	NO	
		Past from 0 to 2 years ²⁸	NO	NO	NO	NO	
		Past from 2 to 5 years	YES	YES	YES	YES	
INTELLECTUAL	which is being	Current interest	NO	YES	YES	NO	



Declared interest		Time since declared interest ended (in years)	ADoI Scientific Committee, Panels, Working Groups and peer review meetings		ODoIS Scientific Committee, Panels, Working Groups and peer review meetings	
			Eligibility Chair & Vice-chair	Eligibility Member	Participation, when interest not overlapping with agenda item(s)	Participation, when interest overlapping with agenda item(s)
PROPERTY RIGHTS linked to the mandate of the scientific group	reviewed as part of a broader scientific mandate or as part of a large body of evidence	Past from 0 to 2 years	YES	YES	YES	YES
		Past from 2 to 5 years	YES	YES	YES	YES
	which is the only or main subject of the mandate	Current interest	NO	NO	NO	NO
		Past from 0 to 2 years	NO	NO	NO	NO
		Past from 2 to 5 years	NO	NO	NO	NO
INTELLECTUAL PROPERTY RIGHTS not linked to the mandate of the scientific group	Current interest	YES	YES	YES	NO	
	Past from 0 to 2 years	YES	YES	YES	YES	
	Past from 2 to 5 years	YES	YES	YES	YES	



Calculation of private research funds (to be performed by the Expert)

Step 1: determination of the Expert's overall research portfolio in €	Research funds directly received and managed by the Expert during the two years preceding the submission of the DoI (Ex: 200,000 Euro) + Research funds benefiting the Expert during the two years preceding the submission of the DoI, and received or managed by his/her organisation of affiliation (Ex: 500,000 Euro) +	Step 2: determination of the amount representing basis for calculation of % of private and public funds	IN THE MANDATE Research funds invested in scientific area(s) pertaining to the mandate of the relevant Scientific Committee/Panel/Working Group/peer review meeting (Ex: 200.000 Euro)	Step 3: determination of the % of research funds from private sector	CONFLICT if > 25%
					Ex: 60.000 Euro of the 200.000 Euro invested in researches pertaining to the mandate of the Scientific Committee/ Panel/Working Group/peer review meeting originate from private sources = 30% NO CONFLICT if = OR < 25% Ex: 40.000 Euro of the 200.000 Euro invested in researches pertaining to the mandate of the Scientific Committee/Panel/Working Group/peer review meeting originate from private sources = 20%



	<p>Research funds directly received and managed by the Expert's Close Family Member during the two years preceding the submission of the DoI (Ex: 50,000 Euro)</p> <p>+</p> <p>Research funds benefiting the Expert's Close Family member during the two year preceding the submission of the DoI, and received or managed by his/her organisation of affiliation (Ex: 250,000 Euro)</p>		<p>OUT OF THE MANDATE</p> <p>Research funds invested in scientific area(s) other than that/those pertaining to the mandate of the relevant Scientific Committee/Panel/Working Group/peer review meeting</p> <p>(Ex: 800.000 Euro)</p>	
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ANNEX 2

Screening Criteria of the individual DoIs of contractors

Declared interest			Time since declared interest ended	Participation in the tender or project
Industry Financial Investment		Overlapping with the subject of the project	Current	NO
			Past 0 to 5 years	YES
		Not overlapping with the subject of the project	Current or past 0 to 5 years	YES
Industry Employment		Overlapping with the subject of the project	Current	NO
			Past 0 to 2 years	NO
			Past 2 to 5 years	YES
		Not overlapping with the subject of the project	Current or past 0 to 5 years	YES
EMPLOYMENT with entities other than food/feed industry and PI		Overlapping with the subject of the project	Current	NO
			Past 0 to 2 years	NO
			Past 2 to 5 years	YES
		Not overlapping with the subject of the project	Current or past 0 to 5 years	YES
MANAGERIAL ROLE , MEMBERSHIP of a SCIENTIFIC ADVISORY ENTITY, OCCASIONAL CONSULTANCY with entities other than PI		Overlapping with the subject of the project	Current	NO
			Past 0 to 2 years	NO
			Past 2 to 5 years	YES
		Not overlapping with the subject of the project	Current or past 0 to 5 years	YES
MANAGERIAL ROLE, MEMBERSHIP of a SCIENTIFIC	Risk management functions	Overlapping with the subject of the project	Current	NO
			Past 0 to 2 years	NO



ADVISORY ENTITY, OCCASIONAL CONSULTANCY, EMPLOYMENT with PI			Past 2 to 5 years	YES
		Not overlapping with the subject of the project	Current or past 0 to 5 years	YES
	Risk assessment functions	Overlapping or not overlapping	Current or past 0 to 5 years	YES
RESEARCH FUNDING with private funds < or = 25%	Linked to the subject of the project		Current or past 0 to 5 years	YES
	Not linked to the subject of the project		Current or past 0 to 5 years	YES
RESEARCH FUNDING with private funds >25%	Linked to the subject of the project		Current	NO
			Past 0 to 2 years	NO
			Past 2 to 5 years	YES
	Not linked to the subject of the project		Current or past 0 to 5 years	YES
Intellectual Property Rights	Overlapping with the subject of the project and which is being reviewed as part of a broader project		Current	YES
			Past 0 to 5 years	YES
	Overlapping with the subject of the project and which is the only main subject of the project		Current	NO
			Past 0 to 2 years	NO
			Past 2 to 5 years	NO
	Not overlapping with the subject of the project		Current or past 0 to 5 years	YES



ANNEX 3

Annual Declaration of Interests (ADoI)

Title (Prof, Dr, Mr, Ms, Mrs)	
Name	
Family name	
Profession	
EFSA involvement(s)	

- ☐ Any modification made to the structure and content of the present template will make the document invalid.
- ☐ Please fill in all fields, as appropriate.
- ☐ Please declare any interest overlapping with EFSA's complete set of responsibility that you or your close family members²⁹ currently have or have had in the past five years.

²⁹ "Close Family Member" means: i. a spouse, meant as the person engaged in the marital relationship with the concerned individual; ii. a partner with whom a Concerned individual has contracted a registered partnership, on the basis of the legislation of the relevant legal system; iii. the direct descendants and ascendants who are financially dependent on the Concerned individual.



I. FINANCIAL INVESTMENTS

I. Financial investments	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name and location of the organization on which the investment has been made.
3. Please indicate any investment such as economic stake or share in an entity with an interest directly or indirectly falling within EFSA's remit, including its stocks, equities or bonds, or of one of its subsidiaries or of a company in which it has a holding. Please provide a description of the investment, including whether you have influence over it (e.g. "no control as it is a fund managed by a professional company with no possibility of deciding the fund's strategy"; or "complete control as this corresponds to ordinary shares I can sell or buy at will") and the field activity of the organisation on which the investment is made.



II. MANAGERIAL ROLE

II. Managerial role	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization.
3. Please indicate any participation, paid or unpaid, in the decision-making process (such as management board membership, directorship, etc.) of an entity with an interest falling within EFSA's remit. Please describe your tasks and responsibilities, the remit of the organisation and how its activities relate to the remit of EFSA. Please indicate also whether the organisation carries out risk management activities, whether you are personally empowered to validate or take management actions/decisions and if you serve as a member of a regulatory committee advising on risk management matters.
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication needs to be given also for past interests older than one year prior to the submission of the ADoI.



III. MEMBER OF A SCIENTIFIC ADVISORY ENTITY

III. Member of a scientific advisory entity	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the entity.
3. Please indicate any participation in the works of a scientific advisory entity with an interest falling directly or indirectly within EFSA's remit and other than those organised by EFSA (such as membership of Scientific Panels, Working Groups, Peer review meetings, Networks, etc.). Please provide a description of the remit of the advisory entity, the subject matter (e.g. substances, products, guidance documents, policies, etc.), your precise role (e.g. Chair, member, etc.), the nature of the advice delivered (e.g. opinion, statement, advice, etc.), the recipient of the advice, and how the subject matter of the advisory entity relates to the remit of EFSA and/or of the relevant EFSA scientific group(s). Please indicate whether the entity carries out risk management activities, whether you are personally empowered to validate or take management actions/decisions or not, or whether you serve as member of a regulatory committee advising on risk management matters.
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication needs to be given also for past interests older than one year prior to the submission of the ADoI.



IV. EMPLOYMENT

IV. Employment	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization.
3. Please indicate any form of regular occupation or business, part-time or full-time, paid or unpaid, including self-employment, and any consultancy activities performed in the context of employment and provided to individual business operators or other private parties and indicate their identities. Please describe the remit of the employing entity or organisation, your precise role, tasks, responsibilities and the nature or area of your work, what the activity is about (e.g. types of substances, products, guidance documents, processes or policies) and how it relates to the remit of EFSA and/or of the relevant EFSA scientific group(s). Please indicate whether the employing entity or organisation carries out risk management activities, whether you are personally empowered to validate or take risk management actions/decisions or not, or whether you serve as member of a regulatory committee advising on risk management matters.
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication has to be given also for past interests older than one year prior to the submission of the ADoI.



V. OCCASIONAL CONSULTANCY

V. Occasional consultancy	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization.
3. Please indicate any consultancy activity occurring rarely so that it does not become a regular occupation, and in which you provide advice or services, paid or unpaid, to companies, trade associations or other bodies with an interest falling directly or indirectly within EFSA's remit. Please provide a description of what the consultancy/advice is about, the topic of the delivered consultancy and the nature of the associated deliverable (e.g. study, report, assessment report, etc.). Please indicate whether the occasional consultancy implies risk management activities, whether you are personally empowered to validate or take risk management actions/decisions or whether you serve as member of a regulatory committee advising on risk management matters.
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication has to be given also for past interests older than one year prior to the submission of the ADoI.



VI. RESEARCH FUNDING

VI. Research funding	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Does the funding received from the private sector during the two years preceding the submission of the ADoI exceeds 25% of the total research budget that is managed by you for the area under concern ⁴ ?
				<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization providing the research funding.
3. Please indicate any funding for research or development work received from any public or private entity either in a personal or professional capacity and falling within EFSA's entire set of responsibilities. It includes grants, rents, reimbursement of expenses, sponsorship and fellowship. Please indicate the topic of the research activity and the nature of the associated output (e.g. study, report, publication, etc.).
4. Please include also research funding received by your employing organisation.



VII. INTELLECTUAL PROPERTY RIGHTS

VII. Intellectual property rights	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization.
3. Please indicate the all works resulting from human intellectual creativity (e.g. patents, trademarks, inventorship, etc.) for which you have been granted rights, irrespective of whether they grant a financial gain, and that fall, directly or indirectly, within EFSA's remit. Please indicate if the intellectual property is still valid or if it expired and provide a description of the topic covered by the granted right (e.g. GMO, pesticides, feed, etc.), your role (e.g. patent holder, contributor etc.) and how the intellectual property right relates to the remit of EFSA and/or of the EFSA relevant scientific group.
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication has to be given also for past interests older than one year prior to the submission of the ADoI.



VIII. OTHER MEMBERSHIP OR AFFILIATION

VIII. Other membership or affiliation	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization.
3. Please indicate any membership or affiliation with entities with an interest falling within EFSA's remit not falling under the categories defined above and relevant for the purposes of the EFSA decision on Competing Interest Management. This shall include roles and membership in professional associations, learned society, Non-Governmental-Organisations and comparable entities. Please provide a description of your precise role, tasks, responsibilities, the activities of the entity or person with whom the activity is engaged, of its remit, and when possible of its funding, and how the activity relates to the remit of EFSA and/or of the EFSA relevant scientific group.
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication has to be given also for past interests older than one year prior to the submission of the ADoI.



IX. OTHER RELEVANT INTEREST

IX. Other relevant interest	Period ¹ <i>From/To</i> <i>(Month/Year)</i>	Organisation ²	Subject matter ³	Impact on annual earnings ⁴
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%
				<input type="checkbox"/> 0% <input type="checkbox"/> >0% but <5% <input type="checkbox"/> >5% but <25% <input type="checkbox"/> >25%

1. Please specify the relevant period of time each activity took place in month/year.
2. Please indicate name, legal nature and location of the organization.
3. Please indicate any interest not falling under the other eight categories above (such as prizes, gifts, awards and hospitality) and relevant for the purposes of the EFSA decision on Competing Interest Management. Please provide a description of the interest, such as the subject matter of the activity (e.g. GMO, pesticides, feed, etc.), your precise role, tasks, responsibilities, deliverables and, if any, the context in which the activity takes place, the field of activities of the organisation and how these relates to the remit of EFSA and of the EFSA relevant scientific group(s).
4. Please indicate the impact of the activity on your annual earnings, by selecting one of the values provided. This indication has to be given also for past interests older than one year prior to the submission of the ADoI.



Decision of the Executive Director of the European Food Safety Authority on Competing Interest Management

I confirm that:

- ☐ I think **I do not have a conflict of interest** with respect to my activity(ies) at EFSA

OR

- ☐ I think **I have a conflict of interest** with respect to the following EFSA activity _____ and for the following reasons _____

I hereby declare that I have read the EFSA Decision on Competing Interest Management implementing EFSA's Policy on Independence and that the above declaration is truthful and complete.

Date: _____

Signature: _____

If you need more sheets to declare your interests, do not hesitate to use blank ones or to ask for them, but please sign each one of them and attach them to this form.



Note regarding the processing of personal data:

EFSA processes all Declarations of Interests (DoIs) in accordance with Regulation (EU) 2018/1725. DoI processing is necessary in order to safeguard the independence of EFSA and enable the Authority to carry out its mission and comply with its obligations under Regulation (EC) No 178/2002.

The Executive Director of EFSA is the data controller with respect to the handling of DoIs.

Concerned individuals have the right to access, rectify, erase and object to the processing of their ADoI at any time. Nevertheless, for certain categories of individuals (e.g., experts), it may be a mandatory requirement to submit a DoI to EFSA so as to verify the absence of conflicts of interests and thus protect the independence of EFSA. Concerned individuals will be contacted if EFSA becomes aware of information that is not consistent with the declared interest such as on the occasion of compliance monitoring activities outlined in the relevant [Standard Operating Procedure](#).

Certain ADoIs shall be made publicly available in accordance with Article 38(1)(d) of Regulation (EC) No 178/2002. Furthermore, ADoIs may be transferred to bodies in charge of monitoring, auditing or inspection in conformity with EU Law.

The conservation period for ADoIs per category of data subjects is 10 years from the date of submission of the relevant ADoI.

Concerned individuals may direct any queries regarding personal data processing by EFSA to the data protection officer DataProtectionOfficer@efsa.europa.eu. They are entitled to submit a complaint at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>

The legal basis for ADoI processing is provided for in Articles 22, 37 and 38 of Regulation (EC) No 178/2002.