

# Declaration of interests

*(Please note that high quality of scientific expertise is by nature based on prior experience and that therefore having an interest does not necessarily mean having a conflict of interest)*

Name : **Konrad Grob**

Title: **DR.**

Profession : **Chemist**

## Current EFSA Involvements

- Member - CEP Panel Experts (2018-2024)
- Member - WG/P/CEP/2018/01 - WG Food Contact Materials
- Member - WG/P/CEP/2018/04 - WG on evaluation of substances used to reduce microbial contamination from products of animal origin
- Member - WG/P/CEP/2018/06 - WG Recycling Plastic
- Member - WG/P/CEP/2021/01 - WG on Extraction solvents
- Member - WG/P/CONTAM/2020/03 - CONTAM WG on MOH in food

## Interests

### I. Financial investments

No interests

### II. Managerial role

No interests

### III. Member of a scientific advisory entity

Period: **01/05/2020 - now**

Organisation: **Council of Europe**

Impact on annual earnings: **0%**

**Subject matter:** Working group on Technical Guide on Compliance Documentation that supplements Resolution CM/Res(2020)9. This working group elaborates a guidance on the compliance work expected from producers to comply with the safety requirements laid down in the Resolution and the Guiding Principals. It is intended to support the producers as well as enforcement in specifying the points to be addressed in the compliance documentation (the check list/data summary, CDS, being the core) and the declaration of compliance that is derived from the documentation. Switzerland has the chair and I am a

member of the group. As typical for the Council of Europe, this working group is composed of delegates of member states of the CoE as well as of industry. There is no payment involved.

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Period: **01/03/2008 - 01/03/2022**

Organisation: **Bundesinstitut für Risikobewertung (BfR), Germany**

Impact on annual earnings: **0%**

*Subject matter:* Member of the Bedarfsgegenständekommission (BeKo; food contact materials) with sub-groups:

- paper and board, which deals (among other subjects) with recycled paperboard and the migration of mineral oil;
- petitions on inclusion of substances into the BfR recommendations;
- analytical methods. This activity comprises 6-7 days per year. The BeKo advises the BfR. Summarized results are published on the internet, including minority statements if a member requires it. Final decisions, however, are taken by the BfR. Subjects are the BfR recommendations, evaluation of substances, evaluations of petitions from industry, advise on on-going research work, standardization of methods and discussion of on-going regulatory work by other German government institutions.

## IV. Employment

Period: **01/07/1974 - 01/07/2019**

Organisation: **Official Food Control Authority of the Canton of Zürich (KLZH)**

Impact on annual earnings: **0%**

*Subject matter:* In August 2014, I partially retired, but kept a 25 % job as consultant/expert for the group focused on chemical analysis based on chromatography that was largely applied to migration from food contact materials; in July 2019, I completely retired, which meant that I stopped all activities in on-going projects. The legislative mandate of enforcement authorities is to implement existing rules. Contacts with business operators range from accusation in case of non-compliance up to joint search for compliant solutions. In cases of non-compliant products, measures reach from informal communication up to confiscation and recall. It was not my job to implement measures. No toxicological evaluation was performed. Enforcement authorities generally have to comply with rules preventing conflicts of interest, e.g. they are not supposed to offer services to industry, as this could prejudice control. However, in cases of non-compliance, costs for the analysis and administration have to be paid by the business operator of concern. The same applies to search for solutions to achieve compliance. Occasionally samples were analyzed against payment if no service laboratory was offering the given analysis (business operators must have the possibility to check for compliance) or for arbitration in cases of disagreement. The determination of mineral oil hydrocarbons in recycled board or food was an example. The task of enforcement authorities is not making money, but to protect consumers. Money is earned by the authority (state of Zurich). The Kantonales Labor Zürich is the national reference laboratory (NRL) for FCMs. With regard to avoiding conflicts of interest, the particularly strict rules applicable to NRLs must be respected. Standard work of enforcement authorities is the control of samples against specific legislation, such as legal limits. However, FCMs differ from most other fields in as far as there is no specific legislation for most types of materials, i.e. general requirements must be enforced. Recycled paperboard was an example. It was of concern, since most uses were in serious non-compliance with the general legal requirement on safety. This put enforcement in a difficult situation. It was not possible to take measures, as the non-compliance was almost normal. Moreover, enforcement not only means rejection of products, but also specification of what can at least

temporarily be considered compliant. This presupposes criteria, including methods for the control of the compliance with these criteria. This has been elaborated with some support from industry (see Occasional Consultancy). No work for industry has been performed on plastics. Plastic recycling, substances transported as previous cargoes on ships for transporting edible fats and oils, residues of extraction solvents in food, enzymes and food processing, such as microbial decontamination of animal products or preservation by high pressure, have not been subjects dealt with. There was no activity on beeswax during the last 30 years. This holds for the KLZH as well as for me personally.

## V. Occasional consultancy

Period: **01/03/2022 - 31/12/2022**

Organisation: **Department of Pharmaceutical Sciences, University of Basel, Basel, Switzerland; Swiss Centre for Applied Human Toxicology (SCAHT), University of Basel, Basel, Switzerland**

Impact on annual earnings: **0%**

*Subject matter:* I'm an advisor for the project "Evaluating the health risk assessment evidence base for food contact material oligomers in polyethylene terephthalate" sponsored by the Swiss Federal Food Safety and Veterinary Office (FSVO) lasting one year. The key researcher is Verena N. Schreier.

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Period: **01/01/2014 - 01/07/2019**

Organisation: **Schweizerisches Verpackungsinstitut (SVI)**

Impact on annual earnings: **0%**

*Subject matter:* In 2010, the Kantonales Labor Zürich (KLZH) started evaluating commercial solutions for the safe use of recycled paperboard. The task was to enable the enforcement of the general legal safety requirement for which no legal specifications existed. A way was needed to have industry supplying information, samples and money. To avoid collaboration with particular business operators, the Schweizerisches Verpackungsinstitut (SVI; an association of the Swiss packaging industry) formed an ad hoc group combining packaging and food industry. Work is on-going, but with my retirement in 2019 I'm no longer involved. Payment to the KLZH was through the SVI. The total sum up to 2019 was below CHF 50,000, which was less than half of the costs and less than 0.1 % of the budget of the KLZH. One of the SVI-supported project I was involved in was completed in early 2020, but without my participation after retirement. However, in 2020 I got involved again in finalizing the report and the publication, without being paid for it. I plan to write a review on the subject, but this will be independent of the project and SVI. All this work cannot be classified as typical consulting of industry, as it was organized from the beginning to avoid conflicts of interest with industry. As mentioned above, it intends to specify the legal safety requirements for industry and to support enforcement authorities in implementing general legal safety requirement.

## VI. Research funding

No interests

## VII. Intellectual property rights

No interests

## VIII. Other memberships or affiliations

No interests

## IX. Other relevant interest

Period: **01/04/2017 - now**

Organisation: **Kantones Labor Zürich**

Impact on annual earnings: **0%**

*Subject matter:* I was a speaker at the following congresses or workshops, always on the basis that my expenses are covered by the organizers, but without further payment. Subjects were related to the work at the Kantones Labor Zürich, mainly to implement better control of the safety of food contact materials. All meetings were open, i.e. without restrictions for the audience. - Fresenius International Conference. Residues of mineral oil and synthetic hydrocarbons in food. 7/8 November 2017. NH Düsseldorf Nord, Düsseldorf, Germany. "Why are mineral oil hydrocarbons a hot issue now? The relevant developments over the last 30 years". - 6th Fresenius Conference on Residues of Food Contact Materials in Food. 21/22 June 2017. Park Inn by Radisson Köln City West. "Improvement of safety assessment of migrates from FCMs – some proposals". - Conference of Istituto Italiano Imballaggio: NIAS and mineral oils in food contact materials: regulatory and analytical affairs. 28/29 March 2018, The Charles Hotel, München, Germany. "Rendering compliance work for FCMs feasible by improved regulatory and private structures". - 7th Fresenius Conference on Residues of Food Contact Materials in Food. 20/21 June 2018. Leonardo Royal Hotel, Köln. "Advances in using recycled paperboard for food contact". - Deutsche Gesellschaft für Fettwissenschaft (DGF). Seminar Mineralölbestandteile in Lebensmitteln und Kosmetika; Toxikologie, Recht und Analytik. 26 March 2019, Hotel Rossi, Berlin. „Eine toxikologische Bewertung der Mineralölkohlenwasserstoffe“. - 12th International Fresenius Conference on Contaminants and Residues in Food, 9/10 April 2019, Park Inn by Radisson Köln City West. "Toxicity of mineral hydrocarbons – how a toxicological evaluation can be misled". - 8th Fresenius Conference on Residues of Food Contact Materials in Food. 13/14 June 2019, Novotel Düsseldorf City West, Düsseldorf/Germany. "Rendering compliance work for FCM feasible by improved regulatory and private structures" and "Concept of the official control of PET recycling – also applicable for other FCM?" - Seminar by Lebensmittelversuchsanstalt Wien, "Mineralölrückstände – Update", 29 Oct. 2019, Hotel Ritz Carlton, Wien. „Aspekte in der Analytik der Mineralölbestimmung“, „Bewertung und Toxikologie“. - 2019 Food Packaging Forum Workshop, "Improving the chemical safety of food contact articles: Accelerating science and innovation", 24 Oct. 2019, Four Points by Sheraton Hotel, Zurich, Switzerland. "European FCM regulation: Opportunity for improvement".

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Period: **01/01/2015 - 01/04/2017**

Organisation: **Kantones Labor Zürich**

Impact on annual earnings: **0%**

*Subject matter:* As part of my job at the Kantones Labor Zürich, I participated on a series of seminars on compliance work for food contact materials in Germany, similar seminars run many times in Switzerland in previous years. Motivation: to improve the situation in Switzerland, the international manufacturers need to be engaged. Organizer: Akademie Fresenius: „Praxistage, Konformitätsarbeit für Lebensmittelverpackungen“. The seminars were open for attendance, the audience mainly from food and

food packaging industry. 26/27 February 2018, Radisson Blue Hotel, Dortmund, Germany / 20/21 February 2019, Park Inn by Radisson Köln City West. My lectures: "Konzept der Konformitätsarbeit über eine komplexe Herstellernetz", "Nachweis der gesundheitlichen Unbedenklichkeit mittels spezifischer Gesetzgebung", „Nachweis der gesundheitlichen Unbedenklichkeit nicht spezifisch geregelter Substanzen (Selbstverantwortung)". I was a speaker at the following congresses or workshops, always on the basis that my expenses are covered by the organizers, but without further payment. Subjects were related to the work at the Kantonales Labor Zürich, mainly to implement better control of the safety of food contact materials. All meetings were open, i.e. without restrictions for the audience. "Sustainable use of recycled board for food packaging: Swiss Packaging Institute (SVI) Guideline for barrier efficiency of internal bags" - Food Packaging Forum (FPF), webinar on mineral oils in food contact materials (FCMs), June 30, 2017, office of FPF, Zürich. "Barrier : clarification of the definition and utilization".

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## User Agreement

I confirm that:

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

- ~~I think I have a conflict of interest with respect to my activity(ies) at EFSA~~

Remarks:

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.

Doi submitted on: 25-03-2022 - 09:04 (UTC)

Signature: SIGNED

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## Note regarding the processing of personal data

EFSA processes all Declarations of Interests (Dols) 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 Dols.

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

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