



The International Life Sciences Institute (ILSI), a corporate lobby group

European Parliament report on EFSA budget rightfully judges links to ILSI as conflicts of interest

Corporate Europe Observatory – May 2012

Introduction

The turmoil surrounding conflicts of interest at the European Food Safety Authority (EFSA) has increasingly put the spotlight on the role played by the International Life Sciences Institute (ILSI). Even though few people may have heard of ILSI, it has been a regular player in Brussels since it opened a European office in 1986. ILSI was founded in the United States in 1978, and it now also has offices in Asia and South-America as well as Europe.

Until recently, ILSI used to describe itself as “a key partner for European industry” whose aim is to “build science in regulatory areas”.¹ ILSI says that, by bringing scientists from academia, government and industry together, it creates “neutral fora” (typically workshops and conferences) where the experts can “jointly provide the best available fact-based, objective science on key public health issues”.² However, a recent report³ by Corporate Europe Observatory (CEO) and Earth Open Source (EOS) has shown that ILSI’s activities often act as a vehicle to promote business-friendly ‘scientific’ concepts and methodologies to be introduced into new food and health policies.

ILSI Europe is primarily funded by its member corporations including BASF, Coca-Cola, Danone, Kraft, McDonald’s, Monsanto, Nestlé, Syngenta, Ajinomoto (the world’s leading producer of aspartame), and Unilever.⁴ A small part of its income also comes from EU-funded research projects. And indeed, ILSI’s areas of work have to be approved by its corporate members, and are usually closely related to the EU agenda.

Not surprisingly, here is where EFSA comes in. From EFSA’s inception in 2002, there have been strong links between the food safety agency and ILSI. Many EFSA panel experts, members of the scientific committee and the management board are actively involved in ILSI’s work.

ILSI is seen as an industry lobby group by campaigners in the US and Europe, and EFSA has clearly been a prime lobbying target for ILSI Europe. But ILSI itself strongly denies that qualification and has not registered in the European Parliament and Commission's lobby register.

In a brochure celebrating ILSI Europe's 25th anniversary in 2011, ILSI president Gerhard Eisenbrand said that the organisation "*operates under strict rules of conduct regarding openness, transparency, disclosure of interests and prohibition of lobbying*" in order to overcome any suspicion regarding its scientific objectivity.⁵

This controversy surrounding the political role played by ILSI is particularly pertinent given that:

- ◆ EFSA has just presented its new rules on independence and is about to renew the membership of eight out of ten expert panels;
- ◆ the European Parliament in a recent report has defined panel members having links with ILSI explicitly as conflicts of interest;
- ◆ the European Court of Auditors is soon to publish its report on conflicts of interest at EFSA and other EU agencies;
- ◆ the European Commission will this year start to review EFSA's founding regulation, that is also meant to govern its independence.

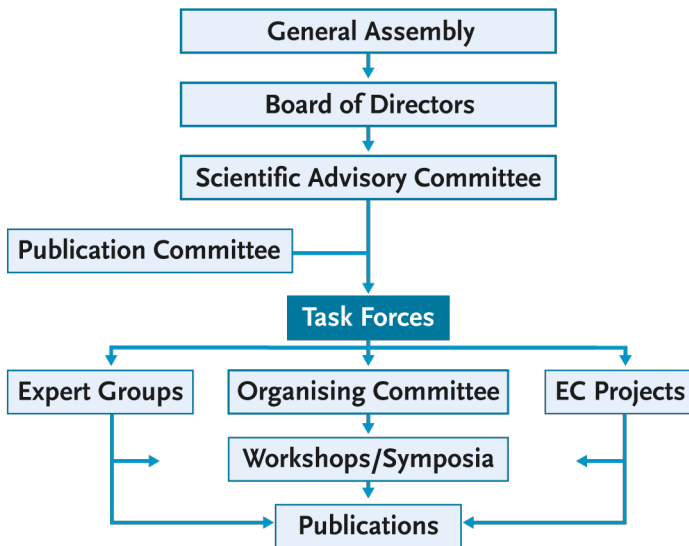
This briefing provides further explanation as to why ILSI should be regarded as an industry lobby group; why EFSA and other EU-related experts should refrain from having ties with this group; and why ILSI should register in the EU lobbying transparency register.

1. ILSI's work decided by industry

ILSI has a Board of Directors and a Scientific Advisory Committee that each have an equal number of industry and non-industry members, something the organisation says safeguards its objectivity⁶. However, the choice of topics and development of the actual work lies with the ILSI task forces which are almost entirely composed of industry representatives. Task forces can invite one or two non-industry experts, if deemed necessary. For instance, the ILSI task force on obesity is made up of eight industry representatives from companies including Nestlé, Danone, Coca-Cola, Kraft and Südzucker,⁷ and one outside academic.⁸

Task forces undertake activities such as conferences, workshops, and publish reports. New task forces can be established with the agreement of the Board of Directors and the Scientific Advisory Committee, and are conditional on the approval of at least five member companies.⁹ This means that ILSI's industry members fully control which topics ILSI works on. Expert groups are then often formed to do the actual work, with "*at least*" half of the members of each said to be from academia or government. These groups have to follow the terms of reference as set out by the task force.

Industry members of expert groups are not reimbursed for their ILSI activities. But non-industry expert group members are offered reimbursements to cover the costs of attending meetings, are paid 300 euro per day if they chair, report or speak at a workshop, and receive an honorarium of up to 1,000 euro if they co-author an ILSI publication.¹⁰



Source: ILSI brochure: ILSI Europe, 25 years towards public health, 2011

2. Calling a spade a spade - and ILSI a lobby group

As said, ILSI explicitly denies that it is a lobby group. The organisation has issued a special statement on lobbying that says: *“Because ILSI receives a majority of its operating and research funding from the private sector, it is often assumed it is a lobbying organization. This is not true. ILSI does not lobby. ILSI’s Code of Ethics and Organization Standards expressly prohibit lobbying on behalf of an individual company or group of companies. Also, while ILSI advocates the use of science in making decisions that affect the health and well being of the public and the environment, it does not make policy recommendations or lobby for specific policy decisions.”*¹¹

At the same time however, the ILSI Code of Ethics states: *“Advocacy of any kind is strictly limited to the use of evidence-based science as an aid in decision-making”*.¹² ILSI therefore admits to carrying out advocacy, a very broad term generally referring to influencing public policy and decision-making. Advocacy can include activities ranging from media campaigns to publishing scientific articles and traditional lobbying. ILSI has chosen to narrow the definition of ‘lobbying’ to activities only involving direct contact with decision-makers in order to avoid being labelled that way.

In the discussion on lobbying, the EU institutions usually refer to “interest representation”, which is a more neutral but also a broader term than “lobbying”. It is defined by the European Commission as *“activities carried out with the objective of influencing the policy formulation and decision-making processes of the European institutions”*.¹³

In June 2011 the European Parliament and Commission launched a joint “transparency register”, aiming to provide information *“on those who seek to influence European policy”*.¹⁴ European Commission vice-president Maroš Šefčovič said at the time: *“All organisations, whether trade and professional associations, NGOs, think tanks or others who have nothing to hide will be in the register and will provide the public and the institutions with information about their work. All those who are not in the register will have to be asked why they can’t be transparent - and they will see their daily work made more difficult by not being registered [...]”*.¹⁵

Whatever the specific wording, the essence is whether the goal of an organisation is to influence public policy and decision making. And this includes groups such as ILSI that, instead of knocking on government doors on a daily basis, invite government experts to their own industry-funded events, publish papers which they make available to policy-makers and regulatory bodies such as EFSA, and which regularly submit comments to public consultations on new policies. The costs of running an organisation like ILSI are borne by ILSI’s corporate members. They would not pay if there were no benefits for them – and as we have seen, they generally decide the topics ILSI works on.

Not surprisingly, ILSI has not signed up to the EU transparency register. Similarly, corporate-funded think tanks such as Friends of Europe have claimed in the past that they should not have to register as according to them, they were not lobby groups as they did not represent any specific interests but instead but provided debating platforms. But according to Commissioner Siim Kallas, responsible for setting up the transparency register, think tanks were *“explicitly and deliberately included in the target group”*. Given the politically strategic nature and timing of the debates, this position was hard to challenge for Friends of Europe, and they eventually gave in and registered in September 2011.

3. ILSI’s influence on policy-making

US groups have been aware of the nature of ILSI’s activities for several years. From its inception in 1978 until 1991, ILSI was headed in the US by Alex Malaspina, who was simultaneously the vice president of Coca-Cola. He was able to position ILSI as an NGO *“in official relations”* with the World Health Organisation (WHO) and with consultative status at the Food and Agriculture Organisation of the United Nations (FAO). However, the WHO Tobacco Free Initiative reported on ILSI’s funding from the tobacco industry in 2001, showing that this led to efforts to thwart tobacco control policies.¹⁶

In 2005 the Natural Resources Defence Council, Physicians for Social Responsibility, the Breast Cancer Fund, International Federation of Journalists, Environmental Working Group, United

Steelworkers of America, and other groups wrote a letter to the WHO, objecting to ILSI's role in setting standards for food and water.¹⁷ The letter said that *"The WHO and other public health agencies risk their scientific credibility and may be compromising public health by partnering with ILSI"* and that ILSI *"has a demonstrated history of putting the interests of its exclusively corporate membership ahead of science and health concerns"*. In 2006 the WHO decided that ILSI could no longer take part in WHO activities setting safety standards for food and water, because of its funding sources.

A 2011 report by Earth Open Source concluded that ILSI's *"neutral fora"* in fact promoted industry-friendly scientific ways of evaluating the safety of a product to government experts. The report found that ILSI's proposals on risk assessment followed a trend of making safety testing procedures less rigorous and cheaper for industry - at the expense of public health and the environment.

While ILSI claims it does not send recommendations or opinions to EU institutions or officials, they often give *"scientific input"* in public consultations. In response to EFSA's public consultation on its policy on independence, ILSI recommended a change in the text on public-private partnerships to portray them more positively: *"Public-private partnerships are an established feature of research in the EU and worldwide. They greatly stimulate innovation (e.g. OECD 2004) and thereby human progress. [...]"*¹⁸ This ILSI recommendation, accepted by EFSA in somewhat different wording, cannot be regarded as 'scientific input' given its political nature, reflecting industry's wish to use these partnerships to facilitate the corporate capture of EU research funds.¹⁹

ILSI has also attempted to preempt discussions on regulation to combat obesity by sowing doubt that obesity is necessarily linked to calorie intake, promoting the view that more physical exercise is the solution. The ILSI obesity task force as mentioned above is made up of representatives from a number of companies that make huge profits by selling vast quantities of high-calorie products, such as Coca-Cola and Mars.

As early as 2000, an ILSI report²⁰ stated that scientific data gave *"no definite conclusions concerning the contribution of food intake per se to the increasing prevalence of obesity"*. The report claimed that *"obesity may be better correlated with indicators of physical activity than with energy intakes"*. In 2011, while admitting that obesity is a major concern for public health, the ILSI task force wrote *"the underlying causes including the role of certain foods in the diet and other lifestyle factors are still subject to considerable debate."* According to the task force, this was due, in part, *"to the lack of scientific data but also to the political nature of the issue."* The question then could be posed as to why ILSI as a 'neutral platform for public health' has not managed to promote research to be done to create more certainty about the relationship between obesity and consuming high calorie food products like Mars bars.

In 2010, ILSI, like most business lobbies in Brussels, hired a PR agency for communications, in this case for the development of an ILSI newsletter. ILSI chose Aspect Consulting²¹ an agency which previously managed the Georgian government's media relations with the West during the war between the Russian and Georgian governments²².

4. The EFSA-ILSI connection

Active collaboration with ILSI seems to be endemic among EFSA's panel experts, scientific committee members and management board members. They have joined ILSI task forces and working groups, authored influential ILSI reports on risk assessment, chair sessions at ILSI conferences, or are members of ILSI's board of directors.

- ◆ *Board of directors: Bánáti and Kováč*

In 2010 EFSA's management board acknowledged that involvement with ILSI could lead to conflicts of interest. When the chair of EFSA's management board Diana Bánáti stepped down from her role at ILSI, the board said that she had *"resigned from positions which may create a potential conflict of interests with EFSA activities."* EFSA added that the chair of the management board should not have a role in an organisation *"representing interests of the food chain, other than public interests"*.²³

However, EFSA apparently finds it acceptable for other management board members to hold leading positions in ILSI. When Milan Kováč declared his membership of ILSI's board of directors in March 2011, no queries were mentioned in the minutes about conflicts of interest. Following media scrutiny, he left the ILSI board in July 2011.

- ◆ *Expert panels: food additives, pesticides, GMOs and packaging materials*

A June 2011 Corporate Europe Observatory report on conflicts of interest among members of EFSA's food additives panel (ANS) found that six out of the 20 members had active collaborations with ILSI, including the vice-chair (now the chair) Ivonne Rietjens. Four of the six failed to declare these ILSI interests to EFSA. Under EFSA rules, failure to disclose *"advice or services in a particular field falling within EFSA's remit"*,²⁴ even if unpaid, can lead to the expert's dismissal – but in these cases did not.

A 2011 report by Earth Open Source exposed how two recent members and one current member of EFSA's pesticide (PPR) panel – Angelo Moretto, Alan Boobis and Theodorus Brock – also had close ties to ILSI.²⁵

Another 2011 report²⁶ by Corporate Europe Observatory showed that five members of the GMO panel active in 2009 (which approved the Amflora potato) had past or current ties to ILSI: Harry Kuiper (chair), Gijs Kleter, Hans Christer Andersson, Jeremy Sweet, and Jean-Michel Wal. Collaborations ranged from authoring key ILSI reports to being a member of an ILSI working group. Twelve members of the 21-strong panel were found to have links to industry.

Similarly, four members of the food packaging panel (the CEF panel) were involved in ILSI activities on food packaging. Roland Franz is a member of the scientific committee of ILSI's International Symposium on Food Packaging due to be held in Berlin later this year²⁷, and Laurence Castle co-authored an ILSI study on *"Estimating consumer exposure to chemicals migrating from packaging materials"*.²⁸

- ◆ *EFSA's Scientific Committee and EFSA's Working Group on TTC*

Another 2011 report²⁹, this time by Pesticide Action Network (PAN) Europe, revealed that of the 13 members on the EFSA working group on the “threshold of toxicological concern” (TTC), an industry-driven approach to allow exposure to levels of chemicals without toxicological testing, eight had formal connections to ILSI. TTC has been promoted and developed by ILSI for over a decade.

These collaborations have not been without impact. For example, ILSI is accused of:

- ◆ Influencing EFSA's recommendations for the risk assessment of pesticides, including watering down the so-called ‘data requirements’ (tests industry has to do in support of its applications for approval). (See Annex 1)
- ◆ Weakening EFSA's guidelines for the risk assessment of GM crops. (See Annex 2)
- ◆ Promoting the TTC concept. EFSA decided to give an opinion on TTC on its own initiative (not in response to a request by a public authority) and the initial opinion was favourable. (See Annex 3). Another issue of concern is the collaboration between EFSA and ILSI on the Margin of Exposure (MOE) concept. (See Annex 4).

EFSA has also granted ILSI credibility as a “scientific” organisation by organising joint events, paying experts to attend ILSI events and by being officially represented on ILSI working groups. In 2005, for example, EFSA and the World Health Organisation (WHO) organised a conference in Brussels “with the support of the International Life Sciences Institute” on the risk assessment of substances that can both damage DNA and cause cancer. EFSA has also paid experts to take part in ILSI activities. Food packaging panel expert Mona-Lise Binderup states in her declaration of interests that she was “paid by EFSA” to participate in an ILSI event “as a representative of EFSA's working group on nanotechnology”.³⁰

5. MEPs and EFSA: links to ILSI mean a conflict of interests

In March 2012, the European Parliament budget committee adopted a report on EFSA's budget and for the first time made explicit statements on the lobbying role of ILSI. Rapporteur Monica Macovei successfully argued for postponing EFSA's budget approval, demanding that EFSA “consider as a conflict of interest the current or recent past participation of its Management Board, panel and working group members or staff in ILSI activities such as task forces, scientific committees or chairs for conferences”.³¹

The report also “recalls that the current Chair of the Management Board failed, in 2010, to declare her membership of the Board of Directors of ILSI; notes that ILSI is financed by firms in the food, chemical and pharmaceutical sectors”.

This means that if EFSA's experts do not break their existing ties with ILSI in the near future, EFSA's budget could be blocked.

New rules introduced by EFSA in March 2012 will also make ILSI's life more difficult from now on. It seems that under these rules, EFSA staff and experts' activities with ILSI will be considered 'ad hoc consultancy'³². Ad hoc consultancy will no longer be allowed either in the past and present for chairs and vice chairs of panels, and will only be allowed in the past for ordinary panel members.³³

This is an important improvement on the previous situation, however it would have been even better if recent ILSI activities would also be banned for ordinary panel members. Also, it remains to be seen how the rules will play out in practice.

ILSI complained about this at EFSA's stakeholder forum meeting in March 2012, arguing that they should rather be seen as activities in a scientific advisory body.³⁴

6. Conclusion

ILSI's attempts to maintain its image as being a 'neutral platform' for experts to meet are unlikely to work any longer. ILSI may have recently changed its self-description from "*key partner for European industry*" to "*key partner for science in public health*" on its website,³⁵ it seems to be too late for this spin to still fool anyone.

ILSI Europe is an industry-driven organisation that aims to influence the EU decision-making process by trying to create questionable 'scientific consensus' on issues that are important to their food and biotech industry members. Whether one calls what ILSI aims to do 'interest representation', 'advocacy' or 'lobbying', ILSI must register on the EU's lobbying transparency register, identifying clearly what policy issues it aims to influence, how much money it receives for that and from whom.

EU institutions and agencies should refrain from having ties to ILSI. ILSI's impact on EU decision making should be investigated and properly acted on. That ILSI's capture of the regulatory science agenda related to EFSA's work is now recognised by the European Parliament budget committee and by EFSA itself is a great step forward for EU citizens.

Annex 1 - How ILSI influenced EFSA's recommendations for the risk assessment of pesticides: the mouse carcinogenicity study

In a recent report,³⁶ Earth Open Source explained how one scientific opinion from EFSA's Panel on Plant Protection Products and their Residues (PPR panel) in 2007 was influenced by an ILSI HESI task force:

The PPR Panel suggests that industry could jettison the 1-year dog study and the mouse carcinogenicity study that form part of the data requirements for pesticides assessment under current law. EFSA says the mouse carcinogenicity study "does not provide any additional contribution to risk assessment" on top of the same study done on a second rodent species, usually the rat.

The PPR Panel cites as its authority for this argument a 2006 paper by ILSI HESI task force leader and then Syngenta employee, John E. Doe. Moretto and Boobis are co-authors of this paper. Doe, like Moretto and Boobis, is involved in the ILSI HESI RISK21 project, as the industry representative of one of the teams working on risk assessment. He is paired with Doug Wolf of the US EPA. EFSA does not mention ILSI's industry backing in its favourable citation.

Alan Boobis was vice-chair of the EFSA PPR Panel 2006–2009. Moretto was a member of that Panel too but resigned after failing to declare an interest with a consultancy. Both held strong ties with ILSI. Boobis was chair of the Board of Trustees and of the Executive Committee of ILSI HESI (until 2010), and a Trustee of ILSI and ILSI Europe. He has been a member of the board of directors at ILSI Europe since 2010.

As EOS observes, the fact that Boobis lists his ILSI roles in his Declaration of Interest, adding that his involvement "has not involved any substance reviewed by EFSA", has little relevance. ILSI's interests are not confined to any single substance and aim to promote an industry-friendly regulatory environment.

Annex 2 - How ILSI weakened EFSA's guidelines for the risk assessment of GM crops

ILSI itself claims to have influenced EFSA's guidelines on GMOs. The German NGO Testbiotech reported that Monsanto employee and chair of an ILSI task force Kevin Glenn boasted at a workshop in 2006 that ILSI's input had a huge impact on EFSA's guidelines. ILSI repeated this claim in one of its reports.

Testbiotech in their report "European Food Safety Authority: A playing field for the biotech industry"³⁷ wrote:

ILSI claims the EFSA guidelines as a success of its Task Force. Kevin Glenn from Monsanto and chair of the ILSI Task Force, pointed out at a workshop 2006 in Athens, that the ILSI (2004) report had had a huge impact. Both the EFSA guidelines and the negotiations on the international standards contained in the Codex Alimentarius were influenced by the ILSI report.

Testbiotech argued that the problem originates in EFSA's assumption that GM plants are equivalent to non-GM plants. The process of genetic engineering changes plants in unpredictable ways that can lead to health and environmental risks. But the guidance only requires comparison of the levels of a few basic nutrients, such as protein and fat, in the GM plant with the levels in a non-GM plant. As a result, unexpected changes will be missed.

This approach, known as "comparative assessment", was, in fact, developed by industry and ILSI between 2001 and 2003. During this period, Harry Kuiper and Gijs Kleter (both members of the EFSA GMO panel since 2003) were active within the ILSI Task Force that developed this concept. Other members included staff from companies including Cargill, Monsanto, Bayer and Syngenta.

In 2004, EFSA adopted the concept in its GM food and feed guidance. So the same people who developed this concept for industry lobby group ILSI sit on the same EFSA GMO panel that makes the rules on GMO risk assessment.

As Testbiotech quotes from a 2008 ILSI report:

In 2002, a task force of international scientific experts, convened by the ILSI Intl. Food Biotechnology Committee (IFBiC), addressed the topic of the safety and nutritional assessments of foods and feeds that are nutritionally improved through modern biotechnology. In 2004, the task force's work culminated in the publication of a report that included a series of recommendations for the nutritional and safety assessments of such foods and feeds. This document has gained global recognition from organizations such as the European Food Safety Agency and has been cited by Japan and Australia in 2005 in their comments to Codex Alimentarius. The substantial equivalence paradigm, called the comparative safety assessment process in the 2004 ILSI publication, is a basic principle in the document.

Annex 3 - The Threshold of Toxicological Concern (TTC)

One of the most recent examples of how ILSI is supporting, or seemingly crucially advancing controversial policies is the Threshold of Toxicological Concern. This concept has been heavily promoted by industry, notably ILSI. EFSA too for some reason has taken an active interest in this approach and has set up a TTC working group. EFSA has stated that it has already started to use TTC for food flavouring substances, and now wants to identify if TTC can be used for other substances.

But NGOs including Pesticide Action Network (PAN) Europe say that the TTC approach would allow for misleading 'safe levels of exposure' for many chemicals which have not been fully tested for toxicity. Food products nowadays contain a large variety of chemical residues that have never been properly tested.

The Threshold of Toxicological Concern (TTC) approach assumes that for the majority of chemicals, there is a common threshold under which no negative effect can be observed (also termed NOEL), and uses probability mathematical models to calculate that threshold instead of actual tests.³⁸ ILSI has been one of the driving forces behind the advancement of the TTC concept. In 1996, ILSI established a task force on the TTC, which has been active until today.

A PAN Europe report³⁹ published in December 2011 has found that numerous experts on EFSA's TTC working group have conflicts of interest with the same industry pushing for the TTC approach, notably with ILSI. No less than eight out of the thirteen members of the working group have official connections to ILSI.

Internal emails requested by Pesticide Action Network from EFSA and reported by Le Monde showed that Susan Barlow, chair of the EFSA working group on TTC, had a large say in the selection of the TTC working group members.⁴⁰ Barlow is a private consultant whose clients include ILSI, Pfizer and Pepsico. She is also a member of EFSA's scientific committee.

Annex 4. EFSA and ILSI collaboration on Margin of Exposure (MOE)

Genotoxic substances are substances the EU aims to ensure people are not exposed to, especially because no safe level is known generally. According to Pesticide Action Network, industry has been trying to change this policy for decades and proposes “safe thresholds” and other tools leading to a continued use of the substances. One of such tools is the so-called margin of exposure (MOE), stating that if the margin between exposure and the level where cancers are observed in animal tests is high enough, the concern is low and therefore the use of the substance acceptable. This, according to PAN, is contradiction to EU policy.⁴¹

EFSA has engaged in this debate even though it seems out of their remit, since MOE is an issue of risk management rather than risk assessment. Even more, EFSA and ILSI jointly organised a colloquium on MOE in 2005. At this meeting, attended mostly by industry people and ILSI-linked experts, MOE was endorsed. ILSI-linked people like Schlatter (overall chair), Barlow (overall Rapporteur), Galli, Kroes, Renwick, and Larsen were present at that time, all of them involved in EFSA panels or working groups.⁴²

Recently the scientific committee of EFSA again submitted an opinion on MOE,⁴³ again very approving of the concept. Involved in writing the opinion were again Schlatter and Barlow, while several other names remain undisclosed. Pesticide Action Network’s Hans Muilerman says: “With this opinion, EFSA shows it engages in areas that are outside their remit, and allow their institute to be used for disseminating industry’s agenda.”

- 1 Former description [at least till September 2011] on ILSI website:
<http://www.ilsi.org/Europe/Pages/Membership.aspx>
- 2 ILSI Europe 25 years. ILSI Europe, 2011.
- 3 Conflicts on the Menu, CEO and EOS February 2012
- 4 <http://www.ilsi.org/Europe/Pages/currentmembers.aspx>
- 5 ILSI Europe 25 years. ILSI Europe, 2011.
- 6 ILSI Europe 25 years. ILSI Europe, 2011.
- 7 Südzucker, a German company, is the largest sugar producer in Europe.
- 8 Dr. Alison Eldridge (Chair) – Nestlé, Dr. Stephen French - Co-Chair – Mars, Dr. Karen Cunningham - Coca-Cola Europe, Dr. Alyson Greenhalgh-Ball - Kellogg Europe, Dr. Anne Lluch – Danone, Dr. Hervé Nordmann Ajinomoto Europe, Dr. Sophie Vinoy Kraft Foods Europe, Dr. Susanne Ziesenitz – Südzucker. The member from the academic world is Prof. Wim Saris of Wageningen University.
- 9 Way of working of ILSI Europe experts groups, <http://www.ilsi.org/Europe/Documents/ILSI%20Way%20of%20working%20for%20the%20website.pdf>
- 10 Way of working of ILSI Europe experts groups, <http://www.ilsi.org/Europe/Documents/ILSI%20Way%20of%20working%20for%20the%20website.pdf>
- 11 ILSI special statement on lobbying. <http://www.ilsi.org/Pages/Scientific-Integrity.aspx>
- 12 ILSI special statement on lobbying. <http://www.ilsi.org/Pages/Scientific-Integrity.aspx>
- 13 European Transparency Initiative: A Framework for Relations with Interest Representatives (Register and Code of Conduct), COM (2008) 323, European Commission, 2008, page 3.
http://ec.europa.eu/transparency/docs/323_en.pdf
- 14 EC press release, 23 June 2011, <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/11/773&format=HTML&aged=0&language=en&guiLanguage=en>
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- 17 Heilprin J. WHO to rely less on US research. Associated Press. 28 January 2006.
<http://www.medkb.com/Uwe/Forum.aspx/nutrition/5496/Money-Talks-in-Whispers>
- 18 EFSA, Technical report on Public consultation on Policy on independence, 15 December 2011,
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- 19 EU research funding: for whose benefit?, Corporate Europe Observatory, 5 December 2011,
<http://www.corporateeurope.org/publications/eu-research-funding-whose-benefit> ,
- 20 ILSI Europe, Overweight and obesity in European children and adolescents, 2000,
[http://www.ilsi.org.ar/biblioteca/ILSI_Europa_Monografias/ILSIObes\[1\].pdf](http://www.ilsi.org.ar/biblioteca/ILSI_Europa_Monografias/ILSIObes[1].pdf)
- 21 See Aspect Consulting's portfolio: <http://www.aspectconsulting.eu/en/index.cfm/about-us/portfolio/>
- 22 <http://www.corporateeurope.org/sites/default/files/sites/default/files/files/resource/CEO-Lobbying-for-governments.pdf>
- 23 EFSA. EFSA management board statement. 21 October 2010.
<http://www.efsa.europa.eu/en/press/news/corporate101021.htm>
- 24 EFSA policy on declarations of interests. EFSA. 5 October 2007.
<http://www.efsa.europa.eu/en/keydocs/docs/doipolicy.pdf>
- 25 Robinson C. Europe's pesticide and food safety regulators: Who do they work for? Earth Open Source. April 2011.
- 26 Corporate Europe Observatory. Approving the GM potato: Conflicts of interest, flawed science and fierce lobbying. November 2011.
http://www.corporateeurope.org/sites/default/files/publications/Amflora_COI_report_2011.pdf
- 27 <http://www.ilsi.org/Europe/Pages/PMsympo12scientificcommittee.aspx>
- 28 EFSA. Laurence Castle Declaration of Interest. 21 December 2010.

- <https://ess.efsa.europa.eu/doi/doiweb/panel/CEF/wg/459703>
- 29 A Toxic Mixture - Industry bias found in EFSA working group on risk assessment for toxic chemicals, PAN Europe, December 2011
- 30 EFSA. Declarations of Interest of CEF panels 2011-2014 and 2008-2011.
<https://ess.efsa.europa.eu/doi/doiweb/panel/CEF/wg/459703>
- 31 <http://www.europarl.europa.eu/document/activities/cont/201204/20120404ATT42587/20120404ATT42587EN.pdf>
- 32 Personal observation from member of EFSA Stakeholder Forum at a Forum meeting, March 2012
- 33 See EFSA new independence rules, Annex IV (p. 37 onwards),
<http://www.efsa.europa.eu/en/keydocs/docs/independencerules.pdf>
- 34 Personal observation from member of EFSA Stakeholder Forum at a Forum meeting, March 2012
- 35 <http://www.ilsi.org/Europe/Pages/Membership.aspx>
- 36 <http://www.earthopensource.org/index.php/reports/10-europes-pesticide-and-food-safety-regulators-who-do-they-work-for>
- 37 European Food Safety Authority: a playing field for the biotech industry, 2010,
<http://www.testbiotech.de/en/node/431>
- 38 "Thresholds of Toxicological Concern: A Proposal for Reducing Animal Testing in Risk Assessment. (Part 1)", Health and Environment, January 23 2012, <http://bit.ly/xCQRYX>
- 39 A Toxic Mixture - Industry bias found in EFSA working group on risk assessment for toxic chemicals, PAN Europe, December 2011
- 40 Pesticide Action Network Europe. EFSA had no control over infiltration of toxics working group by industry network, documents reveal. Press release. 23 January 2012. <http://www.pan-europe.info/News/PR/120123.html>
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- 42 EFSA. 2006. EFSA/WHO international conference with support of ILSI Europe on risk assessment of compounds that are both genotoxic and carcinogenic. 16-18 November 2005, Brussels, Belgium.
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