



LEGAL AND ASSURANCE SERVICES

Annual Report on the implementation of EFSA's policy on independence

Reporting period: 1 January – 31 December 2018

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1. Background

Regulation (EC) No 178/2002¹ laying down the general principles and requirements of food law, establishing the European Food Safety Authority, prescribes that EFSA shall be a point of reference for risk assessment in the food chain through its scientific outputs and its independence. Independence and high standards of professional conduct are crucial to EFSA's work, for it is essential that interested parties and the public at large trust the process leading to the adoption of its scientific outputs.

Against this background, as acknowledged in the EFSA Strategy 2020, EFSA's motto of delivering "Trusted science for safe food" requires adherence to robust ethics and integrity standards². An impartial scientific process populated with objectively developed datasets and managed by scientists devoid of conflicts of interest is of fundamental importance to achieve EFSA's objective of being truly accountable to EU citizens and its institutional partners.

Adequate management of Conflicts of Interest (CoI) is of key importance for EFSA. In June 2017, EFSA adopted a new policy on independence followed by an implementing decision on the management of competing interests applicable to all members of EFSA's Scientific Committee, Scientific Panels, Working Groups, participants in peer-review meetings, network members, members of EFSA's governance bodies, hearing experts, observers, participants to procurement and grant awarding procedures as well as staff of EU institutions, bodies or other agencies taking an active role in EFSA's meetings³.

In its Policy on Independence document, EFSA committed to making publicly available an annual report on independence-related activities, thereby increasing the transparency of related processes.⁴ This annual report is the first on independence-related matters and aims at providing a clear picture of the investments made by the Authority to meet the expectations of EU citizens and its institutional partners.

2018 was an important year for EFSA in terms of independence. The policy commitment of enacting two-year cooling off periods requested by the European Parliament was enforced for the first time during the 2018 scientific panel selection process; a brand-new internal regulatory framework was put in place, ranging from implementing rules to Standard Operating Procedures (SOP); the technological solution supporting Declarations of Interests (DoIs) screening and processing was revised, and work started on a new regulatory framework applicable to EFSA staff.

2. Regulatory developments

Independence is one of EFSA's core values, together with openness, scientific excellence, innovation and cooperation. For this reason, in line with the idea of a lean evolution, the

¹ 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 031 , 01/02/2002, 2-24 as last amended.

² EFSA, EFSA Strategy 2020. Trusted science for safe food. Protecting consumers' health with independent scientific advice on the food chain, available online at https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/strategy2020.pdf.

³ EFSA, Decision of the Executive Director of EFSA on Competing Interest Management, EFSA/LA/DEC/19568050/2018, available online at <http://www.efsa.europa.eu/en/corporate/pub/independencepolicy17>.

⁴ EFSA's policy on independence. How the European Food Safety Authority assures the impartiality of professionals contributing to its operations, mb170621-a2, available online at <http://www.efsa.europa.eu/en/corporate/pub/policyonindependence>.

Authority adopts a continuous improvement approach characterised by the “Plan-Do-Check-Act” cycle⁵.

In the reference period, EFSA developed and put in place the internal regulatory framework necessary for the implementation of its 2017 policy on independence. This included the “Decision of the Executive Director on Competing Interest Management” of 20 October 2017⁶, which was first applied in the context of the 2018 panel renewal procedure, and which was subsequently amended on 29 June 2018, with the amended version entering into force on 1 July 2018. The new Decision on Competing Interest Management introduces the following novelties:

- Two-year “cooling-off” periods from any EFSA scientific activity for experts employed by industry or NGOs.
- Two-year “cooling-off” periods for a wide range of other professional interests, if they overlap with the type of work the expert will carry out for EFSA
- Requirements for experts to declare the financial impact of their interests on their total earnings.
- Sliding scale of restrictions depending on an expert’s financial declaration, up to a two year “cooling-off” period from any EFSA scientific activity.
- Publication of a register of activities of Management Board members after they finish their term of office.
- Publication of the list of EFSA’s partner organisations, such as national and international authorities, universities or research institutes.
- Publication of the declarations of interest of EFSA’s Heads of units.
- Requirements for pesticide experts from national authorities in the Member States to be subject to the same transparency measures and DoI screening rules as experts on EFSA’s scientific panels.
- Strengthened enforcement measures for breaches of the independence rules, up to a ban on working with EFSA for 10 years.

A new version of the SOP on Competing interest Management⁷ came into effect on 13 July 2018, aligning the applicable procedures and workflows to the new decision, and detailing the operational steps to be followed.

Finally, in 2018, EFSA started developing a regulatory framework implementing articles 11 and 11a of the EU Staff Regulations on the prevention of conflicts of interest of EFSA employees and candidates to EFSA vacant positions.⁸ In view of the fact that this forthcoming Decision is implementing the EU Staff Regulations, it must undergo the *ex-ante* agreement by the European Commission set out in Article 110 of the EU Staff

⁵ So called “Deming cycle”, as further reviewed by Imai and Ishikawa, contemplates a continuous improvement process based on four phases: Planning, where issues are identified, hypothesis developed and strategic decisions taken; Doing, where the solutions are tested and implemented on a small scale, and the results measured; Checking, where the results are evaluated and a decision is taken whether the hypothesis and related solution is concerned; and Acting, where the successful solution is implemented: Deming, W.E., 1950. *Elementary Principles of the Statistical Control of Quality*, JUSE; Ishikawa, K., 1985. *What is Total Quality Control? The Japanese Way*. Translated by David, J. Lu. Englewood Cliffs, NJ: Prentice-Hall, Inc, pages 56-61

⁶ Decision of the Executive Director on Competing Interest Management, EFSA/LA/DEC/1857/1869/2017 of 20 October 2017, available online at https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/competing_interest_management_17.pdf.

⁷ SOP on management of competing interests, 13 July 2018, SOP_039_A, available online at https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/SOP-039_A.pdf.

⁸ 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, OJ P 045 14.6.1962, p. 1385.

Regulations. EFSA aims at proposing the new rules for adoption by its Management Board in Q4 2019.

3. *Ex-ante* controls - figures on DoI processing operations

In the reference period, EFSA screened a total of 6 415 Declarations of Interest submitted by its scientific experts, 4 140 of which as Annual Declarations of Interests (ADoIs), and 2 275 as Specific Declarations of Interests (SDoIs).

With the entry into force of the new Decision on Competing Interest Management on 1 July 2018, SDoIs are not needed anymore due to the fact that based on the new screening criteria as well as enforcement of cooling off periods, no interest conflicting with specific items on the agenda is expected to pass the ADoI screening.⁹ This is due to the fact that the identification of a conflict of interest now leads directly to the exclusion of the concerned expert from membership of the relevant scientific group. The only exception to this will be publications and intellectual property rights, for which specific conflicts will continue to be prevented by oral declarations of interests (ODOIs).

In the course of 2018, EFSA also processed 23 ADoIs submitted by current members of its Management Board and made publicly available four ADoIs as part of the registry of activities of former Management Board members.¹⁰

Under the new rules, DoIs have to be submitted also by all tenderers and participants to grant awarding procedures regarding the outsourcing of scientific tasks or projects. In the reference year, this resulted in thirteen calls being launched for which DoIs were requested, which led to the screening of 20 "institutional DoI" as well as of 50 "individual DoIs". None of the conflicts of interest identified were in the context of these screening processes.

Finally, the Authority also processed 380 ADoIs of its staff members, as well as 45 DoIs of candidates being pre-selected for engagement as contract agents, temporary agents, seconded national experts, or national experts in professional training. As far as the screening of DoIs of staff members is concerned, no conflicts of interest were identified, while for candidates, ordinary mitigating measures were adopted in a number of cases to ensure that no perception of conflicts of interest could be caused by certain past interests held by candidates selected for EFSA statutory staff, seconded national experts and national experts in professional training vacant positions.

These ordinary mitigating measures consist in the exclusion for the concerned individual from taking part in processes and projects regarding their previous employer in the private sector, such as those regarding the evaluation of application dossiers submitted to EFSA's attention by applicants, participation in the evaluation of tenders by previous employers, or the review of the candidate's own work.¹¹

3.1. Competing Interests prevented by sector

In the reference period, in the context of *ex ante* controls performed on the DoIs submitted by its experts, EFSA identified and prevented 36 conflicts of interest at ADoI level, and none at SDoI level. This systematically resulted in the exclusion of the expert either from

⁹ Except for intellectual property rights or publications of relative impact for the mandate of the scientific group.

¹⁰ The disclosure of activities of former Board members for two years after termination of their mandate is a voluntary transparency measure proactively adopted by the Management Board in EFSA's policy on independence.

¹¹ For a definition of this concept, see SOP 039 on management of competing interests, available on EFSA's website at https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/SOP-039_A.pdf.

membership or from participation in the discussion at the relevant meeting of the scientific group.

The breakdown by sector of the conflicts prevented is provided in Table 1.

Table 1: Competing interests prevented by sector

Sector	Number of conflicts of interest prevented
Animal Health and Welfare	7
Biological Hazards	1
Contaminants	2
Feed	2
Food Additives and Flavourings	1
Food Contact Materials, Enzymes and Processing Aids	3
Genetically Modified Organisms	2
Nutrition	4
Plant Health	4
Plant Protection Products and their Residues	4
Pesticides	4
Scientific Committee	2
Total	36

4. Ex post controls: compliance and veracity checks

4.1. Background and aggregated results

Pursuant to its Decision of the Executive Director on Competing Interest Management, twice a year EFSA performs a check of the compliance and veracity of a sample of DoIs submitted by experts who participated in meetings of the Scientific Committee, scientific panels, working groups (WGs), peer review or for outsourcing procedures.

For each reporting period, 15 DoIs screening processes are randomly selected, and relevant ADoIs, SDoIs and ODoIs are checked for compliance with the regulatory framework in force at the time the act was adopted and for the veracity of the information contained. Experts participating as Chairs or members in scientific meetings are included in the list for random selection. Experts participating as hearing experts or observers, as well as experts participating in meetings of the Management Board, (scientific) networks, Advisory Forum or Focal Points, those participating in scientific preparatory or follow-up meeting and in scientific conferences and/or workshops on EFSA’s behalf are excluded as they do not hold responsibilities in adopting EFSA’s scientific outputs.

Overall, in 2018 these checks identified 17 findings, one of which was a relevant non-compliance, which will trigger a review of the relevant scientific output by EFSA’s Legal and Assurance Services.

4.2. Findings of compliance and veracity check of 2018

The compliance checks of 2018 demonstrated that, for 26 out of 30 experts checked, EFSA's DoI Rules had been followed correctly. Three minor findings and one non-compliance were identified:

- The SDoI of an expert was missing. A non-conformity report was filed for the non-compliance by the relevant Unit. No further action was adopted since SDoIs have been phased out as of 1 July 2018 and no potential for a conflict of interest was identified.
- The minutes of a meeting were found not to contain reference to the screening of the ODoIs, although it had been performed. A non-conformity report was filed for the past non-compliance by the relevant Unit, and the meeting minutes were republished with a reference to ODoIs. No further action was deemed necessary.
- In another SDoI, the same item was listed twice on the agenda, while another item was missing altogether, thereby potentially impacting on the experts' ability to submit meaningful SDoIs and ODoIs. Since each item on the agenda was correctly linked to the correct mandate publicly available on EFSA's risk assessment workflow (RAW), in view of the fact that at the beginning of the scientific meeting at stake the expert did not declare any ODoI, no further action was deemed necessary.
- Since the validation decision is not automatically notified in full to the operational unit, a conflict of interest of a specific nature identified at ADoI level had not been addressed at SDoI and ODoI level, which resulted in the failure to exclude the expert from the meeting in question. For this case, a non-conformity report was filed by the relevant Unit. Furthermore, EFSA's assurance service will review the scientific output in question to clarify the extent of the expert's contribution. To avoid the occurrence of the same non-conformity in the future, further efforts will be made to raise staff awareness on the requirements set out in EFSA's policy on independence, and to enhance the DoI tool to automatise the notifications of identified conflicts of interest.

The 2018 veracity checks revealed that the ADoIs of 21 experts out of 30 were complete, while for six experts the ADoIs revealed the following omissions, that upon declaration were evaluated as not leading to a conflict of interest:

- a collaborative research and plant health capacity building undertaking of an academic institution in a third country as well as membership in an international learned society.
- Membership in an expert committee evaluating the same substance discussed at EFSA. Upon clarification by the expert, EFSA concluded that the interest was already reflected in the DoI of the expert under another interest category.
- A research funding.
- The evaluation of research projects for two public institutions. In light of the clarifications provided by the expert, EFSA concluded that the missing activities were outside EFSA's remit, and therefore there was no need to declare them.
- Membership in the Board of a learned society.
- Membership in a peer-review committee evaluating certain research applications for a public institution. Upon clarification by the expert, EFSA concluded that the missing activity was older than five years prior to the submission of the DoI, and therefore there was no need to declare it.
- Eight research activities falling within EFSA's remit by the same expert.
- Membership in a scientific committee and two learned societies. Upon clarification by the expert, EFSA concluded that the involvement in these scientific organisations either terminated more than five years prior to DoI submission or that the activity

was limited to simple membership and that therefore there was no need to declare them in the ADoI.

- Membership in a research organisation.

In addition to the customary checks performed on DoI screening processes concerning EFSA's scientific experts, the second compliance and veracity check exercise of 2018 was run for the first time also on DoI screening processes performed by EFSA in the context of its scientific grant and procurement schemes.

In terms of the outcome of the compliance checks, three out of four institutional DoIs and 8 out of 12 individual DoIs checked in the context of procurement and grant procedures, were found to be fully compliant. Minor findings not leading to conflicts of interest were identified as follows:

- a team member of a grant beneficiary failed to declare past employment terminated in the five years preceding the day of submission of the DoI, the impact of his employment on annual earnings as well as whether he was empowered to take risk management decisions. Following up the outcome of the check, the team member submitted an updated individual DoI which was re-evaluated, and no conflict of interest was identified.
- the indication of whether for the declared research projects the funding received from the private sector exceeds 25% was found to be missing in the individual DoIs of three team members. Following up the outcome of the check, the team members updated their individual DoIs, which were re-evaluated and no conflict of interests was identified.
- For all DoIs checked, the DoI assessment by the Evaluation Committee prior to the screening by the Authorising Officer was found to be missing. This did not impact on the DoI screening outcome, which was secured by the authorising officer. EFSA staff supporting outsourcing operations will be subject to targeted training on this specific aspect as preventive measure.

In terms of veracity, it was found that 7 out of the 8 individual DoIs checked were complete, while the following omission, not leading to a conflict of interest, was identified with respect to the DoI of a grant beneficiary:

- Omission of 6 research activities falling within EFSA's remit. The grant beneficiary submitted an updated ADoI including the missing activities. The updated ADoI was re-evaluated accordingly and no conflict of interest was identified.

5. Ex post controls: audit of the Internal Audit Service on Human resources management and ethics

In May 2018, the European Commission's Internal Audit Service performed an internal audit on 'human resources management and ethics' at EFSA. This audit topic was included in the Strategic Internal Audit Plan for 2018–2020 following a risk assessment exercise where the IAS identified a number of processes in relation to risks.

The scope of the audit performed in May 2018 included an assessment of the way conflicts of interests of EFSA staff are prevented or managed by the Authority. The audit fieldwork was performed in 2018 and the final IAS internal audit report is expected in early 2019.

6. Assurance Working Group on Independence/Committee on Conflicts of Interest

Pursuant to Article 22 of the Decision on Competing Interest Management, EFSA's Legal and Assurance Services are advised by the Assurance Working Group on Independence. Prior to the entry into force of the Decision on Competing Interest Management in July 2018, a similar role was performed by the Committee on Conflicts of Interest. The AWGI reports to EFSA's Assurance Council, which in turn informs the Audit Committee of EFSA's Management Board.

Five AWGI/CCI meetings took place in 2018 focusing mainly on the implementation of the new CIM rules and resulting in the issuing of nine opinions.

7. Activities undertaken by former EFSA staff members

7.1. Background

In accordance with Article 16 of EU Staff Regulations¹², an official, temporary agent or contract agent intending to engage in an occupational activity, whether gainful or not, shall inform EFSA within two years of leaving the service. If the activity is related to the work carried out by the official, temporary agent or contract agent during the last three years of service and could lead to a conflict with the legitimate interests of the institution, the authority empowered to conclude contracts may, having regard to the interests of the service, either forbid him/her from undertaking it or give its approval subject to any conditions it thinks fit. The authority empowered to conclude contracts shall, after consulting the Joint Committee, notify its decision within 30 working days of being so informed. If no such notification has been made by the end of that period, this shall be deemed to constitute implicit acceptance.

In the case of former senior officials as defined in implementing measures of the EU Staff Regulations, the authority empowered to conclude contract shall, in principle, prohibit them, during the 12 months after leaving the service, from engaging in lobbying or advocacy *vis-à-vis* staff of their former institution for their business, clients or employers on matters for which they were responsible during the last three years in the service. Each institution shall publish annually information on its implementation, including a list of the cases assessed, in compliance with Regulation (EC) 2018/1725 of the European Parliament and of the Council¹³.

7.2. Overview

In the reference period, no former senior officials or agents left EFSA nor informed the Authority of their intention to engage in outside activities. Furthermore, 7 staff members left EFSA in 2018, 6 of whom opted for the public sector, and 1 of whom for the private sector (see Table 2).

¹² Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013 amending the Staff Regulations of Officials of the European Union and the Conditions of Employment of Other Servants of the European Union.

¹³ Regulation (EU) 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/EC.

Table 2 – Overview of dossiers submitted under Article 16 of the Staff Regulations.

Reference year	Total number of cases	Of which to the private sector	Of which overlapping with EFSA’s tasks	Restrictions applied
2018	6	1*	0	0

*Research organisation.

For completeness, it should be noted also that a former EFSA staff member who left EFSA in 2017 started 2 activities with the public sector in 2018. Moreover, 2 former staff members, who had also left EFSA in 2017, in 2018 started activities with industry in areas overlapping with the EFSA remit. In both instances these activities were approved by EFSA with restrictions. These consisted in the prohibition to act as contact point *vis-à-vis* EFSA; to engage in lobbying and advocacy *vis-à-vis* EFSA staff or experts; or to exploit their relationships with former colleagues to obtain professional advantages or information.

8. Awareness raising and training

EFSA attaches great importance to the need of establishing a corporate culture aware of the importance of ethics and integrity matters, and the fact that the Authority comes across as a workplace intolerant of situations conducive to conflicts of interest.

Against this background, in 2018, several physical and e-training sessions were delivered to EFSA staff, members of the Management Board and experts, in order to raise awareness about the changes brought about by the new Decision on Competing Interest Management (see Table 3).

Table 3 – Training activities

Training activities	
Online e-training tool for experts	1
Sessions for DoI assessors	2
Session for EFSA procurement team in the Finance unit	1
Ethics and integrity session for all staff	1

9. IT developments

In 2018, EFSA modernised the component of its IT solution permitting the automated processing of DoIs of staff members, members of its Management Board and experts, thereby ensuring the sustainability of the DoI tool operated by EFSA and improving its availability and efficacy. The tool currently operated by the Authority relies on a proprietary interface combined with a commercial off-the-shelf software.

In the reference year, EFSA also started exploring the so called “complete solution” that is planned to replace the legacy part of the current IT solution in line with the criteria set out in the EFSA IT strategy. This substantiated in the trigger of a “proof of concept” regarding one of the solutions identified as suitable to address EFSA’s needs.

2018 also saw the delivery of a report from the University of Parma's Department of Engineering that analysed the possibility of using artificial intelligence to screen DoIs processed by EFSA. The report explored approaches based on deep learning and a novel hybrid method using a combination of if/else-like statements, rules and machine learning. The improvements achieved in the evolution of the different systems designed highlight the necessity of adding external knowledge and context awareness to the information content included in the DoIs. Moreover, a drastic increment in the amount of data available would impact positively on the reliability and overall performance of the proposed system. The report concludes that at this stage, however, the automatic classification of DoIs using machine learning remains a challenging issue.

10. Transparency

Building on already highly transparent standards, in 2018 EFSA moved further ahead in making independence-related processes more accessible to citizens and interested parties.

As part of the implementation plan of EFSA's Policy on Independence adopted by its Management Board in June 2017, in Q4 2018 EFSA made publicly available on its website the list of "public institutions".¹⁴ This list is instrumental to the screening of the DoIs submitted by the concerned individuals in accordance with EFSA's Policy on independence and its Decision on Competing Interest Management. In general terms, the inclusion of an entity in this list certifies that the institutional activities performed by its employees in the public interest do not create a risk of conflict with EFSA's interest.

The list is regularly updated by EFSA with new entries based on the DoIs it receives, and the inclusion of an entity presupposes compliance with the criteria set out in Article 2(1) point m of the Decision on Competing Interest Management. In 2018, 514 organisations have been classified by EFSA.

Another measure adopted by EFSA to implement its recent Policy on Independence consisted in the publication, in Q4 2018, of the Declarations of Interests of the members of its operational management team, comprising EFSA's Heads of departments as well as Heads of Unit.¹⁵

In the reference period, EFSA also finalised a report addressing feasibility issues related to the publication of individual decisions taken by the Authority's Legal and Assurance Services in the context of the screening of DoIs submitted by EFSA's experts.

In accordance with EFSA's policy on independence, the findings of the study are expected to be presented to the Management Board in Q1 2019, resulting in a decision on whether these decisions should be made publicly available.

11. Engagement

In 2018, EFSA kept participating to the interagency task force managed by the European Commission's DG SANTE, comprising also representatives of the European Chemicals Agency, European Medicines Agency, Community Plant Variety Office and European Centre for Disease Prevention and Control. This forum is instrumental in optimising the use of

¹⁴ The list is publicly available on EFSA's website at this address: <https://www.efsa.europa.eu/en/howwework/independentscience>.

¹⁵ The DoIs of the Heads of units and of the Heads of departments are publicly available at this address: <https://www.efsa.europa.eu/en/people/operationalmanagement>.

resources deployed by these actors to prevent competing interests; as well as benchmarking and identifying best practices.

Moreover, EFSA engaged with an ad hoc working group of its Advisory Forum tasked with the development of a document to be undersigned by EFSA and the Advisory Forum to acknowledge relevant applicable principles on independence.¹⁶

In the reporting period, EFSA also provided constant support to internal and external stakeholders for the interpretation of the applicable regulatory framework and its operational implementation, by providing the requested support in 551 instances. In 2018, EFSA also engaged 31 times with members of the European Parliament, citizens, media professionals and external parties inquiring about EFSA's independence policy and competing interest management practices by providing the requested clarifications or support.

12. Conclusions

In the reference year, EFSA has devoted its investments in this sector to the implementation of its policy on independence. To deliver the activities described in the previous paragraphs, EFSA invested a total of 3.15 full-time equivalents and EUR 367 500.

A comparable level of investment is expected to continue in 2019 with ongoing work on competing interest management for staff members, cooperation with Member States' authorities, investigation of a complete IT solution as well as transparency.

Furthermore, margins for improvement identified in terms of implementation and compliance in the context of the *ex-ante* and *ex-post* controls are to be addressed in a manner adequate to the risk they represent.

Out of 6 910 DoIs screened by EFSA in the context of the *ex-ante* controls, 36 cases of conflicts of interest were identified and prevented. The *ex post* controls resulted in 17 findings, only one of which consisted in a non-compliance requiring the adoption of remedial measures. (see table 4)

The qualitative analysis of the detailed findings of these operations supports the efficacy of the regulatory system currently in place and improvements in the awareness-raising and IT sectors. Since the full impact deriving from the implementation of the 2017 policy on independence is expected to unfold as of 2019, further improvements in the overall level of compliance will be identifiable over the next two years.

¹⁶ This initiative aims to address point 3.3 of the Policy on Independence and Article 12(2) of the Decision on Competing Interest Management.

Table 4: Overview of 2018 facts and figures on independence

Ex Ante Control									Ex Post Control		Awareness-raising	Resources	
No of DoIs screened	No of meeting agenda items scrutinised	No of conflicts of interest prevented	No of waivers granted	No of Hearing experts	DoIs screened for tenderers and participants in grant-awarding procedures	No of Staff ADOIs screened	No of staff members leaving EFSA	No of organisations classified	No of compliance and veracity check	Breach of trust procedures	No of training activities	M€	FTEs
4 140 ADOIs 2 275 SDOIs	15 116	36: ADOIs 0: SDOIs	16	308	20: Institutional DoIs 50: Individual DoIs 0: conflict of interest prevented	380: statutory staff 0: conflict of interest prevented	Total: 6 Private sector: 1* Restrictions: 0	514	16 non-compliances not leading to a conflict of interest	0	1: online e-training tool for experts 2: sessions for DoI assessors 1: session for EFSA procurement team in the Finance unit 1: Ethics and Integrity session to all staff	0.4	3.15

* Research organisation