



Public Research & Regulation Initiative
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Dr. Catherine Geslain-Lanéelle,
Executive Director
EFSA
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30 November 2010

Dear Dr. Geslain-Lanéelle,

I write to you on behalf of the Public Research and Regulation Initiative (PRRI), a world-wide initiative of public sector scientists involved in research and development of biotechnology for the public good.

The goal of PRRI is to bring the voice of public sector scientists to the debate on regulations and guidelines relevant to biotechnology. More specifically, PRRI aims to bring sound science to the table and raise awareness for the impacts of certain regulatory developments on public research. PRRI has received financial support through, *inter alia*, the 6th Framework Programme of the European Commission.

PRRI has provided on several occasions input on EFSA's work in the field of environmental risk assessment for GMOs, in written submissions as well through participation in EFSA meetings.

As PRRI expressed on many occasions, we believe that the EFSA opinions on individual dossiers have been scientifically sound and robust over the years, but that recent changes in the EFSA guidelines increasingly seem to ask for more data without scientific justification. We are concerned that the distinction between what is need to know and what is nice to know is disappearing and that the qualification "sound" before "science" seems to be forgotten.

I was therefore very pleased to listen to your introduction at the Belgian Presidency Round Table on "the Role of Science in Food Policy", on 20 October 2010. Your words reassured me that it is the intention of EFSA to stay on the track of sound science.

PRRI would appreciate an opportunity to discuss our concerns with you and those directly involved in the GMO risk assessment.

In fact, PRRI has a specific reason to request a meeting with you, because PRRI has twice requested EFSA to be part of EFSA's consultations with stakeholders, and in both occasions this was denied.

In July PRRI registered to participate in a meeting that EFSA would hold late September with NGOs to discuss the draft GMO Environmental Risk Assessment Guidelines. On 22 September we received an email from the GMO unit conveying the decision not to allow PRRI to participate in that EFSA meeting with NGOs.



We were surprised by this decision and in particular by the reasons quoted, which were that 1) PRRI is an NGO mainly dealing with research policy, and 2) that PRRI is not a member of the EFSA Stakeholders Consultative Platform.

Both reasons are flawed. First, as EFSA knows, PRRI's activities focus on the interplay between GMO regulations and public research, of which environmental risk assessment is a key component. Second, the argument that PRRI is not a member of the EFSA Stakeholders Consultative Platform is a curious one, because PRRI has applied to be a member of that platform, which was rejected by EFSA.

More specifically, PRRI groups many public researchers who are active in plant biotech research and in environmental risk assessment of GMOs. As a consequence, PRRI has access to very substantial scientific expertise and experience that without doubt surpasses that of many if not all the NGOs EFSA invited on 29 September or any other group for that matter.

The fact that EFSA did hold stakeholder meetings with the private sector and with so-called 'environmental' NGOs, gives the impression that EFSA doesn't acknowledge that public sector scientists are also stakeholders in this debate, and perhaps among the most relevant stakeholders in relation to EFSA's task. The fact that PRRI was not allowed to participate in the EFSA Stakeholders Consultative Platform would confirm this impression.

Returning to your comments about the crucial role of science in EFSA's work, we hope that you will agree that this also means that EFSA holds meetings with organizations such as PRRI, and that EFSA includes organizations as PRRI in the EFSA Stakeholders Consultative Platform.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Marc van Montagu', written over a light blue rectangular background.

Em. Prof. Marc van Montagu

Chairman of the Steering Committee of the
Public Research and Regulation Initiative

Cc:

Dr. Joanna Darmanin, Head of Cabinet DG SANCO (joanna.darmanin@ec.europa.eu).

Dr. Per Bergman, Head of GMO-Unit (Per.BERGMAN@efsa.europa.eu)