How to avoid conflicts of interest in public health policy-making

Hints and tips for the mindful MEP Office

Things to bear in mind:

1. Actors who have commercial stakes in conflict with public health have a vested interest in undermining, influencing or delaying health legislation affecting them.

2. Beware that such actors may misrepresent science, scientific consensus and public opinion to further their own positions.

3. Remember that lobbying can take place in both formal and informal settings, especially in the small Brussels bubble.

4. Value your own time – don’t engage with actors whose input isn’t relevant or trustworthy.

What to do:

✓ Verify information with institutions, experts or NGOs who are independent from conflicting commercial interests. Not all NGOs or institutions have the financial muscle to work as proactively as commercial actors.

✓ Check who is funding research institutes or organisations you meet. Are there any underlying agendas?

✓ Check who is funding the events, MEP groups or study trips you are invited to. What could be their motives?

✓ Check consultancies before meeting them for potential conflicts of interest in their client base. This can be done by looking them up in the Transparency Register. You also have the right to ask them directly.

✓ Always look critically at the content and wording of amendment suggestions from actors who have commercial interests in conflict with public health.

✓ Remember that accepting gifts over €150 is in breach of the European Parliament’s code of conduct. To be on the safe side, don’t any accept gifts for you or your office.

✓ Consider making public who you are meeting, why and what you took away from the meeting. If any of this makes you uncomfortable, rethink engaging with this actor.

Conflicts of interest in public health policy-making occur when an actor is unreliable because of a clash between their commercial interest and what is best for public health. Tobacco and alcohol companies are clear-cut examples, but these situations can arise in most areas depending on the content and aim of a legislative proposal.

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1 The initiative to create this document was taken by the Swedish organisation IOGT-NTO. It follows the principle of article 5.3 in the WHO Framework Convention on Tobacco Control that actors with a commercial or vested interest in conflict with public health should not take part in guiding health policy. The document has been developed together with a group of Brussels-based NGOs in a consultative process involving MEP offices, researchers and legal experts.