

Guidelines for the Swedish Environmental Protection Agency for identifying conflict of interest in handling research grants

As a state agency the Swedish Environmental Protection Agency (Swedish EPA) shall observe objectivity and impartiality. This equality of all before the law is governed by the constitutional objectivity principle regulated in the Administrative Procedure Act (Förvaltningslagen, SFS 2017:900) 5 § and 1 chapter 9 § of the Instrument of Government. The rules of the Swedish EPA of conflict of interests (disqualifications) in handling the Swedish EPA research grant aim at guaranteeing the impact of the principle to ensure that the Swedish EPA comply with these provisions when handling matters. With conflict of interests we here refer to any circumstances which may upset confidence in impartiality for participants in the handling of research applications.

1. To handle conflict of interests within the review process of the research grants

Appointed reviewers, elected review panel members and chairs as well as research officers report conflict of interest in Prisma. A person who is aware of a circumstance that could be assumed to cause him or her to have a disqualifying conflict of interests is obliged to report this. When in doubt, please ask the responsible research officer at the Swedish EPA. Any other participants in the handling of the application report a conflict of interests to the head of the Research Unit at the Swedish EPA and this is documented in the call's diary.

- Everyone participating in the handling of matters of research grants is obliged to report conflicts of interest to applicants, participating scientists and other participants.
- Research applications should in an early stage be available to reviewers, panel members and chairs in the review panel, prompting them to report possible conflicts of interest.
- When reviewers are appointed and when applications are distributed for review between panel members conflicts of interest should be avoided.
- Participants in the review panel and participants in the Council for environmental research cannot be applicants or co-applicants to the Environmental research grant. Participants in the Scientific committee for

wildlife cannot be applicants or co-applicants to research grants from the Wildlife Fond.

2. Assessment of conflicts of interest

The Swedish EPA considers it a conflict of interest:

- When an economic or other dependency circumstance exists. For example, situations where an applicant or participating researcher has an assignment to evaluate the competence, application, department or subject of the person taking part in the handling of the matter.
- When an ongoing or recently terminated close collaboration exists, such as a teacher-student relationship or a joint research project.
- When there is a relationship between a doctoral student and a supervisor regardless of the time since the collaboration.
- When there is evident friendship, enmity, difference of opinion, or a close relationship.
- When there is a manager-employee relationship.
- When the person taking part in the handling in another context has handled an issue the matter relates to, for example as a representative of another public agency or organisation.
- When co-authorship of books or articles have occurred during the last five years. A joint article or a joint chapter in an edited book may be enough to establish co-authorship. Co-authorship that occurred more than five years ago can also constitute a disqualifying conflict of interest. The determining factor will be whether it was the result of close collaboration. This should be assessed from case to case.
- When a person taking part in the handling of a matter belongs to the same institution (particularly small and medium-sized ones) or a similar financially independent entity as an applicant or participant.
- When the nature of a person's involvement in the matter compromise the basis for impartial assessment.

The administrative procedure act 2017:900 on conflict of interest

§ 16:

An individual who becomes privy to administration of a matter on behalf of the authority in a manner that may affect the decision has a conflict of interest if

1. the individual or closely-related person is a party to the matter or otherwise may be affected by the outcome to a significant extent
2. the individual or a closely-related person is or has been a deputy or representative of a party to the matter or of someone else who may be affected by the outcome to a significant extent
3. the individual has participated in final administration of a matter at another authority and has thereby taken a position on questions that the authority is to hear in its capacity as a higher body
4. there are extraordinary grounds for questioning the individual's impartiality in the matter

The authority is to disregard conflict of interest if the issue of impartiality clearly lacks importance.

§ 17:

An individual with a conflict of interest may not participate in administration of the matter or be in attendance when any aspect of the matter is adjudicated. The individual may nevertheless perform tasks that would occasion undue delay if left to anyone else.

§ 18:

An individual who is aware of circumstances that may occasion a conflict of interest is to immediately notify the authority.

The authority is to examine any possible conflict of interest as expeditiously as possible.

The subject of the inquiry is to participate in the examination only if required for the authority to have a quorum and if no replacement can be found without occasioning undue delay.