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Canadian Science Advisory Secretariat

Policy on Conflict of Interest in Science Peer Review Processes

1. Policy Title

Policy on conflict of interest in science peer-review processes

2. Effective Date

This policy is effective July 15, 2021.

3. Policy Objective

The objective of this Policy is to communicate how CSAS defines, identifies and manages real, perceived or potential conflicts of interest of all participants (Fisheries and Oceans Canada (DFO) employees and external participants), throughout all stages of the CSAS science peer review process.

4. Policy Statement

Scientific integrity and objectivity are critical elements of all stages of the CSAS science peer review process, including but not limited to, planning, development of scientific documents, science peer review meetings, and in the dissemination of science advice. Unidentified and unmanaged conflicts of interest held by individuals at any stage of the science peer review process could undermine the integrity of the advice and erode public trust. However, it is recognized that individuals with real, perceived or potential conflicts of interest may also possess valuable information and perspectives that can contribute to the peer review process. It is critical, therefore, to identify and manage real, perceived or potential conflicts of interest throughout the CSAS process.

Individuals with a real, perceived or potential conflict of interest may participate in a CSAS science peer review process provided they agree to be objective and remain so when presenting, interpreting, or challenging scientific information and analyses, and when contributing to the development and dissemination of science advice.

This policy should be considered in concert with the *Policy on Participation in Peer Review Meetings* when considering who should participate in CSAS science advisory processes.

5. Context

CSAS peer review processes are consistent with DFO's *Scientific Integrity Policy*, developed in 2019 in conjunction with Canada's Chief Science Advisor, Treasury Board, the Professional Institute of the Public Service of Canada and science-based federal departments. DFO's *Scientific Integrity Policy* "...applies to Fisheries and Oceans Canada employees who design, conduct, communicate, manage, review, provide advice or input into, or

make use of Fisheries and Oceans Canada research, science or related activities. ...DFO employees shall avoid conflicts of interest, and ensure that any real, potential or apparent conflict of interest is explicitly recognized, reported and appropriately managed.”

This CSAS conflict of interest policy directly addresses the importance of objective science, free from political, commercial and client interference. The CSAS conflict of interest policy also adheres to the principles of the Science Advice for Government Effectiveness (SAGE), developed by the Council of Science and Technology Advisors to support the effective use of science advice in making policy and regulatory decisions, and aligns with the requirements of the Values and Ethics Code for Fisheries and Oceans Canada and the Canadian Coast Guard. The establishment of SAGE, the *Scientific Integrity Policy*, the *Values and Ethics Code* and this CSAS Conflict of Interest Policy is consistent with the best practices of international organizations and governments to support science-based decision-making.

6. Definition of a Conflict of Interest

A conflict of interest is defined as an interest by a participant that may affect, or be perceived to affect, the participant’s objectivity and independence in contributing to the peer review process. A real conflict of interest exists at the present time; a perceived conflict of interest could be apparent to an observer, whether or not it exists, and a potential conflict of interest could be foreseen to exist in the future.

Conflicts of interest may arise from, but are not limited to a participant’s:

- Financial interests and investments, including donor contributions;
- Employer affiliation;
- Consulting arrangement(s);
- Current and anticipated grants or contracts;

- Commercial or personal relationships with others who have material interests in related businesses, stakeholder organizations, or the federal public service; and/or
- Policy or political positions relevant to the outcome of the process;

7. Identifying Conflict of Interest

Conflicts of interest meeting one or more elements in the definition above need to be identified, and managed as early as possible in all stages of the science advisory process.

Invited DFO employees must identify to their immediate supervisor and the peer review meeting Chair(s) any real, perceived or potential conflict of interest they may hold before and during their involvement in any stage in the CSAS science peer review process to determine the nature of the conflict and whether the employee can remain objective throughout the science advisory process.

Invited external (non-DFO) invitees must consider whether a real, perceived or potential conflict they may hold can be managed and whether they can remain objective during the CSAS process. Invitees seeking further consideration or clarification regarding a conflict they may have should discuss their circumstances, and options to manage the conflict, with the Chair(s) in advance of the peer review meeting. CSAS Steering Committees will also consider whether individuals who have formerly participated in CSAS processes, maintained their objectivity throughout the process. Accepting an invitation to a CSAS process (which requires having read this CSAS Conflict of Interest Policy), confirms the invitee's agreement to abide by the Policy and to remain impartial and objective throughout the process.

CSAS recognizes that due to employer relationships, some participants may have an inherent perceived conflict of interest. In these cases, maintaining objectivity requires particular attention on the part of the participant and the chair(s).

8. Managing Conflict of Interest

During peer review meeting introductions and as appropriate throughout the meeting, the Chair(s) will remind participants of the need for transparency and objectivity in order to maintain the integrity of the process.

Should an individual's behaviour repeatedly interfere with the transparency or objectivity of the CSAS process at any stage, the Chair(s), the regional or national CSAS coordinator, and/or Policy Authority, with input from the Steering Committee may at any point in the CSAS process determine if a particular course of action is warranted to address a real, perceived or potential conflict of interest.

Courses of action during the meeting, or subsequently, may include, but are not limited to the following:

- Deeming an individual ineligible to participate in all or part of the CSAS science advisory process;
- Recusing a participant during a particular section(s) of a science peer review meeting; or
- Deeming a participant ineligible to participate in future CSAS peer review processes pertaining to the topic under scientific peer review.

To ensure a consistent national approach to managing conflicts of interest, CSA Office will document cases where conflicts of interest required intervention. This requires Chairs to report all such cases to their Regional and the National CSAS Office

9. Application and Authority

This policy applies to all Fisheries and Oceans Canada staff and all external (non-DFO) participants taking part in any stage of the DFO CSAS scientific peer review process.

The science peer review meeting chair(s) retains the authority to identify and manage conflicts of interest during the peer review meeting.

For Regional peer review processes, the final Authority for application of this policy, including any measures taken and resolving disputes regarding the interpretation and implementation of this Policy, is the Regional Director of Science, who may consult with the Regional or National CSAS Office or ADM Ecosystems and Oceans Science as needed.

For Zonal peer review processes, the final Authority for this application of this policy, including any measures taken and resolving disputes regarding the interpretation and implementation of this Policy, is the Regional Director of Science for the Region leading/coordinating the peer review process, who may consult with the other relevant Regional Directors of Science, the Regional or National CSAS Office or ADM Ecosystems and Oceans Science as needed.

For National peer review processes the final Authority for application of this policy, including any measures taken and resolving disputes regarding the interpretation and implementation of this Policy, is the Executive Director of Science Programs, who may consult with the relevant Ecosystems and Oceans Science Director General or ADM as needed.

Questions on the policy may be addressed by e-mail to:

Executive Director, Science Programs
Ecosystems and Oceans Science
Fisheries and Oceans Canada

10. Last Review Date

January 2021

Date modified:

2021-10-21