

Mr Geert Dancet
Executive Director
European Chemicals Agency (ECHA)

8 March 2017

Dear Mr Dancet,

Thank you for your prompt reply to [our letter](#) of 6 March. Unfortunately, [your response](#) of 7 March heightens rather than alleviates our concern that ECHA has failed to apply its own rules on conflicts of interest.

In particular, I would like to highlight four areas that your letter fails to address.

1. ECHA's conflicts of interest policy covers both interests that could interfere with ECHA's overall work and interests that could interfere with ECHA's work on a specific dossier, such as glyphosate. **Your letter explains how you manage specific conflicts of interest, but fails to address our concerns about conflicts of interest that can affect ECHA's overall work.**
2. ECHA's policy considers interests "that existed during the last 5 years preceding the assessment" as giving rise to potential conflicts of interest. Your statement that the RAC Chair "made a clean break with his previous employer" is far from reassuring. Allowing experts to move freely between the private sector and public authorities, so long as employment periods do not overlap, is the definition of revolving doors. **A transition from the private to the public sector cannot be considered a "clean break" without an appropriate cooling off period.**
3. ECHA's conflicts of interest policy considers consultancy services to be "private interests" that could interfere with ECHA's own mission. TNO, Triskelion B.V., the Nofer Institute of Occupational Medicine and the Finnish Institute of Occupational Health all provide such services. In particular, Triskelion B.V., the RAC Chair's former employer, is a company specialised in risk assessment services for the chemical industry. It focuses on the EU's chemicals legislation (REACH), and companies such as BASF have praised Triskelion B.V. for its support and professionalism, according to Chemical Watch's [Global Service Providers Guide](#). **Conflicts of interest related to industry consultancy cannot simply be declared. They must be ruled out.**
4. ECHA's conflicts of interest policy requires that experts declare the "provision of an expert opinion or testimony in the regulatory field of activity of ECHA for a commercial entity or other organisation, as part of a regulatory, legislative or judicial process". The definition of scientific criteria for endocrine disruptors is the subject of an ongoing regulatory process. If an expert opinion in relation to this process can be omitted from the declaration of interests, the requirement to disclose such interests may as well be scrapped. **These rules only make sense if they are enforced.**

I would also like to reiterate our concern about ECHA's fundamental dependence on unpublished scientific evidence provided by industry. Whether or not this is "normal practice", we believe that it calls into question the independence of scientific assessments conducted by European agencies.

I look forward to your response on these points.

Yours sincerely,

[signed]

Jorgo Riss
Director, Greenpeace European Unit