

Mr Jorgo Riss
Director
Greenpeace European Unit asbl/vzw

Subject: Reply to your letter of 8 March

Dear Mr Riss,

Thank you for your letter of 8 March, in which you reiterate your concerns about ECHA's independence and transparency. It is clear from our exchange that we both place great importance on the integrity and independence of scientific opinion- and decision-making in society. However, we clearly disagree on how that can best be achieved.

ECHA's independence policy builds on international best practice, as reflected in guidelines from the Organisation for Economic Co-operation and Development and the European Commission. The common objective of these is to protect the independence of public bodies whilst enabling them to collaborate with the best available experts. The European Court of Auditors audited ECHA's policy and procedures in 2015 and found that we had implemented all their recommendations from the 2012 special report on conflicts of interest. We are clearly in line with international best practice.

ECHA is an organisation built on science and we need excellent experts in all disciplines. Most of our staff and Committee members have a background in the public sector or academia. However, that does not mean that we rule out working with people who have relevant experience in the private sector or stakeholder organisations. Practical experience from the chemical industry or consultancy is valuable for a public regulatory organisation. But a clean break with the previous employer is a pre-condition for employment, as is the management of potential conflicts of interest on specific substances colleagues may have worked on in their previous job. ECHA also has strict rules for all staff leaving the Agency, and can impose conditions for up to two years after departure. Departing committee members also continue to be bound by confidentiality.

I also note your disagreement with our interpretation of an "expert opinion". Our guidance could perhaps be clearer on this point and I intend to review and clarify it.

I would like to reiterate that transparency is one of this Agency's core values. We make great efforts to ensure that we operate as openly as possible. We also have a legal duty to protect intellectual property and confidential business information. The EU legislation requires us to work with unpublished studies undertaken or commissioned by industry.

I regret that your continued concerns are leading you to the perception that the independence of our scientific opinion-making may be compromised. I propose to discuss this matter with you and your fellow stakeholders at the annual Accredited Stakeholder Workshop in Brussels on 18 October 2017. Should the consensus be that indeed we can improve on this, then I am absolutely ready to do that. The independence of this Agency is of paramount importance to all of us. As before, I am placing this letter on our website.

Yours sincerely,



Geert Dancet
Executive Director