



EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Head of Unit

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Dear Prof. Bridges,

**Subject: Participation in the 2nd meeting Risk Assessment Committee (RAC)
meeting of the European Chemicals Agency (ECHA)**

I thank you for your detailed explanation of 5 December 2012 concerning your participation as an observer/accompanying scientist representing the European Plastic Converters industry association (EuPC) in the discussion on the point of the agenda concerning 'non classified phthalates' during the 23rd meeting of the Risk Assessment Committee (RAC) (27-30 November 2012) of the European Chemicals Agency (ECHA).

I refer to my acknowledgement message to you on 10 December 2012. I apologize that this final note closing the matter has been delayed until now. The reason is that I did not want to send it to you at the same time as your personal message of 31 January 2013 reached me.

As indicated in my letter of 4 December 2012 to you, we have examined the situation in light of your explanation and the provisions of the Scientific Committee Rules of Procedure relating to Independence (Chapter 5, points 18-32) adopted by the Scientific Committees on 18 December 2009, in conformity to Article 12 of Commission Decision 2008/721/EC of 5 September 2008 and have formed the following views on this matter.

On procedural grounds, it seems that there has been a breach of established procedures as set out in Chapter V, points 18-32 and in particular point 21 which stipulates that members of the Scientific Committees are '*...under a continuing duty to declare any activity, situation, circumstance or other fact potentially involving a direct or indirect interest...*'. While it is not explicitly stated that such declarations must be done in advance of any such activity, in today's public and institutional attention to matters of scientific advice and independence of scientists, a legitimate expectation would be for all of us to go on the side of caution and ensure that activities or situations which may be or be perceived as being conflictual are properly communicated in advance to the Commission.

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By email only

On substance, while the purpose of your intervention at the RAC meeting is clear from the explanations you offered and of course your scientific integrity is not being put in question, the issue is being precariously close to constitute a conflict of interest. Hence I commend your proactive decision to step down from the Chairmanship and from the membership of the Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR) Working Group on DEHP in Medical Devices.

I wish to underline our appreciation of the work you personally have carried out over the years. It has enabled to develop science-based European policies which have ensured a high level of health, consumer and environmental protection.

Yours faithfully,

[Signed electronically]

Tapani Piha