



National Institute for Public Health
and the Environment
Ministry of Health, Welfare and Sport

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PAN Europe Chemicals Coordinator

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Our reference

021/2014 M&V MvR/ar

Date 13 February 2014
Subject Reply

Dear mr M,

Last week, we were notified about the press release of PAN Europe in which your report "A poisonous injection" was presented dealing with the issue of combined exposures to pesticides. In your press release and the report, PAN Europe is arguing that many scientist and regulators are 'linked' to industry. In your view, this results in a) a methodology that favors the view of industry and b) a delay in introducing proper risk mitigation measures. We do not share this view. To our regret PAN Europe has chosen to try and substantiate its view by questioning the scientific integrity of several scientist on a personal basis. Among others, we (the undersigned) were attacked personally. We are strongly affected by these accusations and firmly reject the image created by PAN Europe.

First of all, fitting within RIVM's mission in the area of public health protection, we have been advocating the importance of combined exposure in risk assessment for many years. In scientific publications as well as in our activities in the area of regulatory toxicology we have continuously brought this issue to the attention of both the scientific and the policy world. To be more specific, it was during the time of the Dutch EU chair in 2005 that Regulation (EC) No 396/2005 'on maximum residue levels of pesticides in or on food and feed of plant and animal origin' was adopted. As you know, this Regulation explicitly asks for method development to assess combined exposure and risk. To develop these methods is a complex and time-consuming process which has to be carried out in good international cooperation. To suggest that this process was hampered by us is the opposite of the truth.

RIVM has a very good international reputation of designing proper and scientific sound methods for chemical risk assessment. For combined exposures, RIVM has promoted the use of sound methodology which enables the EU and national governments to carry out proper risk assessments on the issue of combined exposures. Our goal has been and will always be the protection of public health where necessary.

As you will very well know, RIVM is a public and independent knowledge institute. Dutch law safeguards our independent position. When working in the international arena we have been very clear about our position, either as RIVM employee (civil servant) or as expert working on a personal title. For example, our declarations of interest (DOI) for EFSA are very transparent on this. In addition, RIVM has under-signed the code of conduct of the Royal Academy of Sciences in the Netherlands (KNAW) for good indepent scientific performance.

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RIVM is acting in a dynamic world and has to consider societal developments. For that reason, we will always be in contact with various stakeholders including policy departments, enforcement agencies, consumer organizations, scientific organizations, NGOs as well as industry. Sharing data and views between all stakeholders is of utmost importance to make progress. For example, in the development of the ACROPOLIS methodology within the international consortium, we have organized multiple stakeholder dialogue sessions inviting also specifically NGOs including PAN Europe. Unfortunately, PAN Europe has only visited one of these meetings. The ACROPOLIS methodology has received a lot of good support including from EU policy makers and consumer organizations.

Therefore we feel that the accusations of PAN Europe specifically directed to our personal scientific integrity are misplaced, false and are based on suggestive arguments only. Furthermore, in our opinion this action does not support the development of proper methods to protect public health at all.

We therefore invite PAN Europe to visit RIVM for an open dialogue on your motives and arguments, and how to promote the protection public health in particular. Of course, we ask PAN Europe to rectify the accusations on our scientific integrity.

Yours sincerely,

Dr. Marcel T.M. van Raaij
Dr. Bernadette C. Ossendorp
Ir. Jacob D. van Klaveren.