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To the President-elect of the European Commission, Mr Jean-Claude Juncker

Dear Mr Juncker,

In an open letter on 22 July, nine health and environment organisations called into question the role of Chief Scientific Adviser (CSA) to the President of the European Commission, stressing that the post is "fundamentally problematic as it concentrates too much influence in one person, and undermines in-depth scientific research and assessments carried out by or for the Commission directorates in the course of policy elaboration".

The intention of that letter was to stimulate a debate about how scientific policy advice should be structured, and the risks that continuing the CSA position poses to scientific policy advice in general. The NGO signatories have since been accused of trying to undermine the integrity and independence of scientific advice received by the Commission. In fact, it is precisely this integrity and independence that we are seeking to uphold. Far from being anti-science, our message is that there should be more objective and diverse expertise available to policy-makers than any single adviser could reasonably be expected to provide.

We note that the Commission already has a set of processes and institutions providing scientific policy advice. The general problem is not a lack of scientific evidence, but the inconsistency with which the European Commission responds to the evidence presented even by its own services. President Barroso's experiment of establishing a CSA position has not made a difference in this respect. It even undermined expert research undertaken by European agencies and independent scientists.

Re-appointing a CSA is not the way for the Commission to ensure that scientific evidence informs its policy-making; rather it creates additional problems. Vested interests have long realised that the more you concentrate scientific advice into the hands of one person, the easier it is to control. Politicians value an apparently authoritative voice for garnering support for particular policies. In the UK, for example, several CSAs have come under fire for issuing apparently partial advice too closely aligned to specific commercial and political interests. The influence of corporate lobbyists is made even easier by the fact that the CSA of the European Commission has no obligation to publish the advice given to the President.

The current CSA has stated that her advice should remain "not transparent" and immune from public scrutiny (1), and this is of concern to us. We fully support the principle that scientific advice should be independent, objective and transparent. Having a single CSA for the whole of EU policy-making makes it difficult to uphold this principle.

It might not be a coincidence that only three countries in the EU had established the CSA post as a full-time government office, the UK, Ireland and Czech Republic. Two of them have recently abandoned this model and only the UK still holds on to it (2). The large majority of EU Member States apply other systems to provide independent, objective and transparent scientific advice to policy-makers.

Scientific scrutiny in policy-making is essential. The question is how to ensure that the best representation of wide-ranging scientific advice is available to you and your colleagues. The CSA position does not and cannot fulfil this purpose. This is not because of a lack of resources but because of the fundamental flaws of the role itself. We would welcome a debate on how to put science at the heart of European politics.

Yours sincerely,

Magda Stoczkiewicz, Director, Friends of the Earth Europe

Hans Muilerman, Pesticide Action Network

Anne Stauffer, Deputy Director, Health & Environment Alliance (HEAL)

David Azoulay, Centre for International Environmental Law (CIEL)

Dr Doug Parr, Greenpeace

Nina Holland, Corporate Europe Observatory (CEO)

Dr Christoph Then, Testbiotech, Germany

Jamie Page, Cancer Prevention and Education Society, UK

Claire Robinson, GM Watch and Earth Open Source, UK

Dr André Cicolella, Réseau Environnement Santé, France

Christophe Morvan, Fondation Sciences Citoyennes, France

Patti Rundall, Baby Milk Action/IBFAN, UK

Dr Will Dinan, Director & Secretary, Spinwatch, UK

Patricia Cameron, Bund für Umwelt und Naturschutz Deutschland, Germany

Leonore Gewessler, Director, Global 2000, Austria

Martin Galea de Giovanni, Chairperson, Friends of the Earth Malta

Bernard Ivcic, President, Zelena Akcija/Friends of the Earth, Croatia

Nanna Clifforth NoAH/Friends of the Earth, Denmark

Dr Michael Warhurst, Executive Director, CHEM Trust, UK

Max Bank, Lobbycontrol.de, Germany

Marga Jacobs, Chairperson, Leefmilieu, The Netherlands

Maryse Arendt, Director, Initiativ Liewensufank, Luxembourg

François Veillerette, Director, Générations Futures, France

Sascha Gabizon, Executive Director, Women in Europe for a Common Future (WECF), Germany/Netherlands/France Helen Lynn, Alliance for Cancer Prevention, UK

Dr Lone Mikkelsen, The Danish Ecological Council, Denmark

Sarah Cardona, Action for Breast Cancer Foundation, Malta

Notes:

- (1) http://www.euractiv.com/sections/science-policymaking/glover-eu-chief-scientist-should-stay-shadows-307768, Euractiv, 6 August 2014.
- (2) Cf. the entries on national governance structures in the European Commission Platform on Research and Innovation policies and systems

 http://erawatch.irc.ec.europa.eu/erawatch/opencms/information/country_pages/

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