

CECCM comments on the Review of the Scientific Committees

CECCM welcomes the review of the Scientific Committees and efforts made to improve their functioning and service provision on risk assessment. In carrying out the review CECCM member companies propose the Commission take into account the following considerations.

Possible adaptation to the mandates of the Scientific Committees

The proposals to revise the mandates of the three Scientific Committees are not completely clear in the consultation document. Whilst a precise reformulation and supporting reasoning is provided for SCHER, both the SCCP and SCENHIR lack detailed reformulation. CECCM would have liked to see reformulations for each of the Committees to further aid our consideration of the issues.

The consultation document references the need to reinforce the mandate of SCENHIR to enable it to provide more scientific support for public health policy. Taking this into consideration CECCM member companies believe it to be of increasing importance to make clear the role of the Committees, particularly SCENHIR, in risk assessment as opposed to risk management.

In support of this CECCM recommends the Commission put in place a risk assessment policy to provide a clear distinction between risk assessment and risk management and articulate a defined role of the Scientific Committees in risk assessment. CECCM member companies believe that such a policy would help to facilitate the work of the Committees and aid the drafting of 'working mandates' for opinions and the delivery of focused risk assessments. The policy should be supported by risk assessment guidelines to ensure each opinion is formed according to referenced standards and takes into account all the steps needed to produce a robust risk assessment opinion. CECCM welcomes the suggestion that the Inter-committee Co-ordination Group could develop procedural or methodological guidelines.

Improvements in the structure and composition of the Committees

CECCM member companies welcome all of the suggestions outlined in the consultation document on improving the structure and composition of the Committees.

A positive further step would be to give consideration to the idea of identifying bias in addition to looking at independence which would help facilitate access to and put an emphasis on relevant expertise. Tests could be designed to identify potential biases of prospective experts and it should be possible to develop ways in which to limit the impact of biases. This would facilitate access to a greater pool of relevant expertise and enable contributions from those experts who may not meet rigid independence criteria but nonetheless have significant expertise to offer on a specific subject. At the same time the process should limit participation of those who regardless of relevant evidence to the contrary are committed to a particular view and demonstrate unwillingness to consider other perspectives.



The time frame of the review of the Scientific Committees probably does not enable this to be taken into full consideration, however CECCM member companies suggest this aspect be taken into further consideration by the Commission and/ or be included for consideration by the Inter-committee Co-ordination Group alongside the existing suggestion in the consultation document that they be tasked with the harmonization of practices in relation to the follow up to declaration on interests.

Improvements in the functioning of the Scientific Committees

CECCM member companies broadly support each of the improvements listed in this section of the consultation paper.

CECCM member companies welcome the proposed formalisation of the Inter-committee Co-ordination Group and are encouraged to see its tasks would include the adoption of procedural or methodological guidelines, and practices on the treatment of confidential data. CECCM member companies hope that the positive steps taken in the past year and the improvements outlined in the consultation document on stakeholder dialogue be equally applied to the Inter-committee Co-ordination Group as they are the three Scientific Committees. The Co-ordination Group should consult with relevant stakeholders including industry when developing and establishing these guidelines and practices.

CECCM supports enlargement of the working procedures to include the use of expert workshops and hope further to our comments provided last year that this can be one of the ways in which industry stakeholders can positively contribute to an open and transparent exchange of views and data.

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