

## Open Letter



**HUMANE SOCIETY  
INTERNATIONAL**  
EUROPE



European Society of Toxicology In Vitro



European Society for  
Alternatives to Animal Testing



27 October 2021

To: Mr Virginijus Sinkevičius, Commissioner for the Environment, Oceans and Fisheries  
Mr Thierry Breton, Commissioner for the Internal Market  
ECHA Management Board

Re: Selection of a new Executive Director of the European Chemicals Agency (ECHA) provides an opportunity for the EU to lead in the field of chemicals management and implementation of innovative science

As the European Commission seeks to recruit a new Executive Director to lead the European Chemicals Agency (ECHA), it should consider qualifications and selection criteria that will identify a candidate who not only meets the minimum requirements of the REACH regulation, but who will also be a champion for a green, sustainable and innovative future that leads on the application of non-animal methodologies.

ECHA plays a vital role in the implementation of the EU's chemicals and associated legislation – with overarching mandates to “ensure a high level of protection of human health and the environment, including the promotion of alternative methods for assessment of hazards of substances, as well as the free circulation of substances on the internal market, while enhancing competitiveness and innovation”.<sup>1</sup> The above quoted “alternative” methods for risk assessment are also called New Approach Methodologies (NAMs), especially by ECHA. They include any method or approach that avoids or minimizes the use of animals, and they are often considered to provide more human-relevant information than the data from animal experiments. Although promotion of NAMs is one of three overarching mandates governing ECHA's actions, there are no criteria included in the vacancy notice to ensure that the future Executive Director has the required competencies and motivation.

In an ever-changing social, political and technological landscape, it is vital that ECHA's new leadership embraces that the agency's core mandates of safety, innovation and replacement of animal testing are not mutually exclusive, but deeply interdependent, and require a holistic approach to fully achieve an EU toxic-free environment. In order to appoint the visionary leadership that ECHA needs, and make sure that due attention is paid to the promotion of NAMs when selecting suitable candidates for this post, the following criteria should also be met:

- With the EU embarking on its ambitious Green Deal and Chemical Strategy for Sustainability, it is more important than ever that the new Executive Director be a visionary with proven expertise in driving predictive non-animal safety assessment to implement innovative non-animal NAMs that meet the needs of the future.
- The Executive Director of ECHA should be independent from EU Institutions and have a respected international profile, a collaborator who can work within and between the agency and stakeholders, including other agencies, the regulated community and NGOs, to facilitate solutions to fulfil the legal obligations to protect humans and the environment and ensure that animal testing is indeed a last resort only.
- ECHA's new leadership should have a vision to advance the use of NAMs, following the example of the European Food Safety Authority (EFSA)'s “roadmap for action ... to define a multiannual strategy for increasing the use of NAMs in EFSA human health risk assessment to minimise the need for animal-based verification studies, so that by 2027 the large majority of EFSA requests for additional data are based on NAMs.”

<sup>1</sup> Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

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Correspondence: Troy Seidle, PhD  
Humane Society International/Europe  
Brussels, Belgium  
(tseidle@hsi.org)

Despite previous calls from Humane Society International and major industry stakeholders, criteria to ensure that the mandate on the promotion of NAMs is considered a core requisite were not taken into consideration and are once again missing from the vacancy notice. We therefore respectfully submit these considerations, to be taken into account in the selection process and by the Commission's pre-selection panel when short-listing candidates with the desired profile for the post, and by the ECHA Management Board in making a final appointment, so that this oversight can be corrected.

Sincerely,

**Troy Seidle**

Vice President, Research & Toxicology  
Humane Society International

**Thomas Hartung**

Chair for Evidence-based Toxicology  
Director CAAT  
Johns Hopkins Bloomberg School of Public Health, USA  
Co-director CAAT-Europe  
University of Konstanz, Germany

**Winfried Neuhaus**

President EUSAAT

**Costanza Rovida**

President of *ecopa*

**Helena Kandarova**

President of ESTIV  
Chair of the Slovak National Platform for 3Rs

**Marcel Leist**

Chair of *in vitro* toxicology and biomedicine  
Co-director of CAAT-Europe  
University of Konstanz, Germany

**Horst Spielmann**

Secretary General EUSAAT  
Freie Universität Berlin