

## ECHA DECLARATION OF INTEREST

There is a conflict of interest where the impartiality and objectivity of a decision, opinion or recommendation of the Agency and/or its bodies, is or might in the public perception be compromised by an interest held by, or entrusted to, an individual working for the Agency.

Please note that having an interest does not necessarily mean having a conflict of interest. In particular, high quality of (scientific) expertise is by nature based on prior experience. Declaring an interest does therefore not automatically disqualify you or limit your participation in the activities of the European Chemicals Agency.

On the other hand it should be emphasised that this declaration of interest form does not contain an exhaustive list of potential interests and that all other elements that might jeopardise your independence when working with the Agency should thus also be indicated. Your answers will then be reviewed and dealt with in accordance with the ECHA Procedure for Prevention and Management of potential Conflicts of Interest.

### Declaration of Commitment

I hereby declare that I shall make all reasonable efforts to fulfil my duties related to the work of the European Chemicals Agency.

### Declaration of Interests

First Name: Tiina

Last name: Santonen

Position in ECHA: Member of RAC

hereby declares to have the following interests:

## I. Employment, consultancy, legal representation or advice

Within the past 5 years, were you employed or have you had any other professional relationship with a commercial entity<sup>1</sup> or other organisation<sup>2</sup> with an interest in the regulatory field of activity of ECHA?

No

Yes, and more in particular:

Function/Activity	Time period (from...until month/year)	Name of organisation or commercial entity	Description
Employment as a senior research scientist (until 2006) and thereafter (from 1.1.2006 until end of 2015) as a team leader (Chemical Safety Team). From 1.1.2016 I have been working as a Senior Specialist and from 1 <sup>st</sup> of March 2018 as Chief Specialist.	6/2001 – until now	Finnish Institute of Occupational Health	The Finnish Institute of Occupational Health (FIOH) is an independent institution under public law operating in the field of administration of the Finnish Ministry of Social Affairs and Health. FIOH is a research, development and specialist organization in the field of occupational health and safety. In the field of chemical safety, FIOH provides training and industrial hygienic services to Finnish workplaces. It also trains Finnish occupational physicians and has a specialist unit for the diagnosis of occupational diseases. FIOH has provided consultancy to industry related to the chemical safety assessment of substances (some metal compounds and alloys) under REACH. I was personally involved in some of these contracts until 2013.

<sup>1</sup> This includes any commercial business, consultancy, research institution or other enterprise whose funding is significantly derived from commercial sources. It also includes independent own commercial businesses, law offices, consultancies or similar.

<sup>2</sup> An 'organisation' includes governmental, international or non-profit organisations, as well as interest groups.

## II. Membership of Governing Body, Scientific Advisory Body or equivalent structure

*Within the past 5 years, have you participated in the internal decision-making of a commercial entity or other organisation with an interest in the regulatory field of activity of ECHA (e.g. board membership, directorship) or have you participated in the works of a Scientific Advisory Body with voting rights on the outputs of that entity?*

No

Yes, and more in particular:

Function/Activity	Time period (from...until month/year)	Name of organisation or commercial entity	Description

### III. Other membership or affiliation

*Within the past 5 years, have you had any membership or affiliation other than the above that can be perceived as creating a potential conflict of interest?*

- No  
 Yes, and more in particular:

Function/Activity	Time period (from...until month/year)	Name of organisation or commercial entity	Description
Member of SCOEL	from 2010 until now	EU Scientific Committee on Occupational Exposure Limits	Involved in the preparation of SCOEL recommendations on OELs

### IV. Research funding

*Within the past 5 years, have you or the research entity to which you belong received any support from a commercial entity or other organisation with an interest in the regulatory field of activity of ECHA, including grants, rents, sponsorships, fellowships, non-monetary support?*

- No  
 Yes, and more in particular:

Function/Activity	Time period (from...until month/year)	Name of organisation or commercial entity	Description
Publicly -funded /co-funded research in the field of occupational health and safety	on-going activity		FIOH is a research institute, which has several research projects ongoing in the field of occupational health and safety. These projects are usually publicly funded (national funding or EU funding) but may include co-funding from private companies participating in the study usually as study subjects. This co-funding from companies is in many cases a prerequisite for public funding. During the past 5 years I have been involved in some

			publicly funded/co-funded industrial hygienic research projects. Currently I'm involved in publicly funded projects related to biomonitoring and chemicals in circular economy (national or EU R&D funding).
--	--	--	--

## V. Investments

*Do you have current investments in a commercial entity with an interest in the regulatory field of activity of ECHA, including holding of stocks and shares, stock options, equity, bonds, partnership interest in the capital of such undertaking, one of its subsidiaries or a company in the capital of which it has a holding and which amounts to more than 10,000 EUR per commercial entity or entitling you to a voting right of 5% or more in such commercial entity?<sup>3</sup>*

- No  
 Yes, and more in particular:

Investment	Name of organisation or commercial entity

## VI. Intellectual Property

*Do you have any intellectual property rights (e.g. patent, trademark, copyright or proprietary know-how) in the regulatory field of activity of ECHA that might create a potential conflict of interest?*

- No  
 Yes, and more in particular:

Intellectual Property	Name of organisation or commercial entity	Description

---

<sup>3</sup> You may exclude financial interests held through an investment fund, pension fund and/or interests in non-nominal unit trusts or similar arrangements, provided that these investments are broadly diversified and you have no influence on their financial management.

## VII. Public statements and positions

*Within the past 5 years, have you provided any expert opinion or testimony in the regulatory field of activity of ECHA for a commercial entity or other organisation as part of a regulatory, legislative or judicial process? Have you held an office or other position, paid or unpaid, where you represented interests or defended an opinion in the regulatory field of activity of ECHA?*

- No  
 Yes, and more in particular:

Function/Activity	Time period (from...until month/year)	Name of organisation or commercial entity	Description

## VIII. Other relevant information

*Are there any other elements that could be seen as jeopardising your independence when working for the Agency?*

- No  
 Yes, and more in particular:

I was among the scientist who undersigned the open Letter to Anne Glover on draft regulation of endocrine active chemicals which was published also as an editorial in several toxicology journals in 2013 and which expressed the concern on the ignorance of principles of pharmacology and toxicology and advise from EU own Scientific Committees in the drafting regulation on EDCs, see, <https://www.sciencedirect.com/science/article/pii/S0278691513004572?via%3Dihub> . Although I undersigned this as an independent scientist, it has been perceived as defending industry position.

## IX. Interests held by close family members<sup>4</sup>

Do any of your close family members hold any current interests in the regulatory field of activity of the Agency (as specified above in the sections I.-VIII.)?

- No  
 Yes, and more in particular:

Function/Activity	Name of organisation or commercial entity	Description

- I wish to have any reference to interests held by close family members removed if this declaration is to be made public on the ECHA website.<sup>5</sup>

I hereby declare that I have read both the ECHA Procedure on Prevention and Management of potential Conflicts of Interest and the related ECHA Guidance document and that the above Declaration of Interest is at my best knowledge complete. I understand that for all members of the ECHA bodies, the Executive Director and the other ECHA management staff (Directors and Heads of Unit), as well as for the chairpersons of the ECHA Committees this declaration will be published on the ECHA website.

Please note that the European Chemicals Agency will ensure on its part that your personal data hereby submitted is processed as required by [Regulation \(EC\) No 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data](#). The data is necessary for the purpose of implementing the Agency's Procedure for Prevention and Management of potential Conflicts of Interest and will be retained for a time period of 7 years. You have the right to access and rectify that data. Under certain conditions, a right to erasure, restriction, objection and/or data portability also applies. To exercise these rights, please contact the relevant secretariat. You can contact the Agency's [Data Protection Officer](#) for any questions or complaints with regard to the processing of your personal data. In case you do not receive a satisfactory outcome, you can have recourse to the [European Data Protection Supervisor](#).

Date: 28.1.2019

---

<sup>4</sup> For this purpose, 'close family members' are considered to be the persons forming a household with the person making this declaration (spouse, partner, and/or dependent children). For privacy reasons neither the relationship nor the name is to be included. Only current interests held by close family members are of relevance and not past interests.

<sup>5</sup> As full transparency is one of the general principles of this Procedure, this option should only be used in case the consent of the individual concerned has not been obtained, when he/she has objected to the disclosure on compelling legitimate grounds or if there is reason to believe that the legitimate interests of the individual involved might be prejudiced by the disclosure (see also Regulation (EC) No 45/2001 on the protection of personal data).