

President Jean-Claude Juncker
European Commission
Rue de la Loi 200
Bruxelles 1040

Brussels, 20 March 2015

RE: European Commission Chief Scientific Adviser Position
CC: First Vice-President Frans Timmermans

Dear President Juncker,

The American Chamber of Commerce to the EU (AmCham EU) is encouraged by your commitment to producing high-quality regulation and reducing unnecessary administrative burdens in order to keep Europe on track to restoring growth and jobs. The confirmation in the Commission's 2015 Work Programme that the Commission's regulatory toolbox will be further improved through adjustments to the evaluation, impact assessment and stakeholder consultation process was also most welcome.

AmCham EU firmly believes that objective, independent and rigorous science-based decision-making has wide-ranging benefits for European policy-making. We were therefore disappointed to learn that the role of the Commission's Chief Scientific Adviser may be discontinued. It is critical that Commission policy making be appropriately informed and supported by the type of neutral and objective input that a Chief Scientific Adviser (CSA) can provide. Decisions based on robust evidence enhance the legitimacy, impartiality and public trust of EU legislation, while also contributing to the regulatory consistency that attracts investment into Europe.

The role of the Chief Scientific Advisor also shows the importance the Commission attaches to its better regulation agenda and would send a clear signal to investors and business that Europe is a sound location for investment, based on solid, proportionate and evidence-based regulation. Creating an environment where regulatory processes are seamless and regulatory approval happens in a predictable and timely manner also stimulates innovation. Given the central role of science in driving innovation and fuelling investment, we fear that the abolition of the CSA role would send entirely the wrong signal; a Chief Scientific Adviser could play an important role in spearheading science communication, making clear that science and innovation are key to sustainable economic growth and employment.

Discontinuing the role of CSA would be particularly unfortunate as policy-makers are increasingly faced with regulatory decisions on more complex, technical questions than ever before, in the areas of climate change, energy, environment, food and healthcare policy, to name but a few. It would be especially helpful if the CSA had a formal role in the Commission Impact Assessment process in order to ensure the full implications of policy options are explored.

We welcome your appointment of Commissioner Moedas to review potential options to ensure that all Commission decisions are based on sound scientific evidence and are hopeful that the CSA will be made a permanent part of the Commission's institutional structure.

The American Chamber of Commerce to the EU (AmCham EU) is actively engaged in developing and proposing policies that will help get Europe back on track to economic growth and job creation. As representatives of American companies who invest in Europe and employ millions of Europeans (amounting to an aggregate of €2 trillion and employing 4.3 million people in Europe), we are committed to the European economy and have developed strong, constructive working relationships with the Commission and the other EU institutions. We are committed to creating a strong, united and competitive Europe operating in an open global environment.

We remain at your disposal to discuss these issues in more detail.

Yours sincerely,



Karl Cox
Chair
American Chamber of Commerce to the EU