

Position statement by the Swiss Centre for Applied Ecotoxicology (Ecotox Centre) on the evaluation report

01.04.2021

We would first like to thank the Advisory Group and its leader, Dr. Bettina Hitzfeld, Federal Office for the Environment (FOEN), as well as the team of Econcept AG, Zurich, for the efficient execution of the evaluation. We thank the FOEN for funding this evaluation. Our comments on the contents of the evaluation report and, in particular, the recommendations are as follows:

1. General Comments:

We are pleased that the evaluation concludes that the core mandate of the Ecotox Centre is appropriate and useful for the long term. We would like to emphasize that the evaluation concludes that the Centre continues to establish itself as a centre of excellence and that it continues to enjoy national and international recognition for its high quality services. It should also be noted, that its presence in the German and French-speaking parts of Switzerland is perceived as valuable. Finally, it is clear that the base funding of the Ecotox Centre is still too low to ensure the realization of its very broad portfolio of tasks. Thus, this poses a risk and limitation to sustainably maintain the skills and networks necessary for retaining the high quality of its expertise through the planning of more permanent positions.

While we agree with the majority of the conclusions reached, we were surprised by some of the results of the survey presented in the evaluation report. It must be pointed out that the interviewees who contributed to the survey did not have equal levels of knowledge on the Ecotox Centre's functioning and services. In addition, the majority of the interviewees were members of the Advisory Group. This approach may have influenced the balance of opinion from the testimonies and therefore the recommendations made in the evaluation report.

2. Comments on findings and recommendations:

Staff structure and funding in relation to the broad portfolio:

We agree with the conclusions of the evaluation, that the high number of temporary positions is a risk for sustainably maintaining the skills and networks needed for retaining the high quality of expertise in the long term. We would therefore like to do everything possible to retain the existing expertise by creating permanent positions. We equally think that creating permanent positions will help to develop our expertise on solid foundations. We also support the suggestions about a timely decision on the way forward regarding the Director's position of the Ecotox Centre.

The Ecotox Centre addresses a wide range of topics with a high level of expertise in applied ecotoxicology. The unique expertise that we continue to build in Switzerland is part of the Centre's mandate to serve the stakeholders. We would like to emphasize that this wide range of topics reflects the demands and needs of cantonal and federal authorities as well as industries, which are to be treated with the same level of priority. In order for the Centre to remain efficient in responding to all requests, it is important to maintain stable human resources and to intensify collaborations. A



repeated loss of expertise is to be avoided. This is particularly so, as we anticipate that such needs for our expertise will expand in future.

We are therefore very much in favor of the recommendations made, i.e. to determine the optimal proportion of permanent and temporary positions, and to examine to what extent the permanent positions could be financed by third-party funds. We would also like to explore to what extent it is possible to acquire an increase in base funding, although in the past such attempts were not fruitful. We would like to remind that similar comments on the budget (too low) and permanent positions (not enough) have been made in the evaluation of 2015. Since then we have actively been in contact with key players in the field (Bafu, BLW, cantons, Agroscope, newly established Soil Competence Centre) to seek funding in areas that are of importance for these institutions. Despite the lack of base funding we have been able to strengthen our expertise in soil and terrestrial ecotoxicology, which was identified as a need, however, a long-term solution will not be found until the issues regarding funding for permanent positions can be resolved.

Independence of the Ecotox Centre – link with Eawag and visibility in the ETH Domain:

As described in the evaluation report, criticism has been expressed about the integration of the Ecotox Centre within Eawag and EPFL. Specifically, the independence of the Ecotox Centre from Eawag has been questioned. These are long-standing concerns that need to be addressed as soon as possible.

We would like to point out that the establishment of the Ecotox Centre in 2008 was mandated by the Federal Council to the ETH Board and delegated to Eawag and EPFL. The Ecotox Centre has no legal entity of its own. It is from an administration point of view part of Eawag, though its budget is managed separately (i.e., as a cost centre). Within Eawag, the Ecotox Centre has the status of a department, and its staff members are employed at Eawag with the corresponding rights and duties. The Ecotox Centre reports to the Eawag directorate and EPFL delegate, Eawag includes the Ecotox Centre in its reports to the ETH board.

Experiencing the support from both institutes, we agree with the statement that the integration of the Ecotox Centre within Eawag and EPFL brings many advantages in terms of scientific exchange and synergies, finances, administrative and IT support, infrastructure, networking and location. We agree that this integration offers the best cost/performance ratio. While the Ecotox Centre pays overhead to both Eawag and EPFL, these advantages are highlighted by the fact that, in Dübendorf, the Centre will soon move to new offices and labs in a new building (funded by Eawag) and that, in Lausanne, the labs will be renovated in 2021 (funded by EPFL). On the other hand, we believe that the visibility of the Ecotox Centre should be strengthened within the ETH Domain. We underline that the seeming lack of independence from Eawag cannot be separated from the fact that the Centre is legally part of Eawag. With regard to EPFL, the question of lack of independence does not arise. Here we would like to emphasize that our scientific independence has never been challenged or compromised by either host institution, and we are confident that this will remain so in the future. In our opinion, the integration of the Centre within the ETH Domain is clearly the best option.

We therefore welcome the recommendation of organizing a roundtable discussion involving the management of the Ecotox Centre, representatives of Eawag, EPFL and the Advisory Group, and the ETH Board. We believe that this will help clarify the questions of the independence of the Ecotox Centre.



Dübendorf and Lausanne locations:

The fact that the Ecotox Centre is based in both the German and French-speaking parts of Switzerland has advantages in terms of facilitating exchanges with stakeholders throughout the country. However, it was pointed out that the internal links between the two sites could be strengthened and that more emphasis should be placed on linguistic diversity. Furthermore, it was proposed to institutionalize the exchange between both sites to some extent by launching appropriate forums, and to use appropriate IT tools to assist exchanges between locations and to counteract language barriers.

We do not understand where these recommendations came from. We suspect that they are based on a lack of knowledge regarding the internal functioning of the Ecotox Center. For more than 10 years, we have used videoconferencing - at least once a week – which brings together the whole team. We also hold regular face-to-face meetings between the two groups (e.g. organization of retreats, workshops or trainings). Since the end of 2019, we further intensified collaboration between sites by creating internal cross-cutting working groups. The complexity of the topics we have to address often requires cross-cutting knowledge, thus calling on different expertise represented within the Centre and at both its locations. The objectives of each cross-cutting group are 1) to intensify the exchange of ideas between the different experts of the Ecotox Centre on common ecotoxicological topics, 2) to stimulate the development of cross-cutting internal collaborative projects, 3) to increase the sharing of information between research groups and within the groups themselves to facilitate consulting and training. Along the same line, we also organize weekly on-line coffee breaks. While lab work is depended on the facilities at each site, most risk assessment related issues are not and there is an exchange of experience and personnel. We are convinced that it is precisely because of the intensive exchange between the two sites, that numerous internal projects have been launched and close collaborations have been built.

We do not experience internal issues with language barriers. Our exchanges are generally conducted in English which the whole team masters exceptionally well.

Composition and Tasks of the Advisory Group:

We agree that the task and role of the Advisory Group needs to be clarified to make better use of the knowledge available in this group regarding the needs of authorities, industry and society for the future development of the Centre. The role of the Advisory Group has been defined to be twofold. First, it should advise the Ecotox Centre and provide feedback on the strategy of the Ecotox Centre, thus allowing the Centre to incorporate the stakeholders' needs in its activities. Second, it is responsible for the periodical evaluation of the Ecotox Centre. In the present evaluation report, it is proposed, that the Advisory Group be used more as a content-related strategic instrument for the development of the Ecotox Centre. We are concerned that this would then become another Strategic Steering Committee with the right to decide on the strategic directions of the Centre as existed in the past (see the last evaluation and the adaptations of the business plan). This would be counterproductive, as the majority of the members of the Advisory Group are not experts in the field of ecotoxicology but represent stakeholders. A formal involvement of stakeholders in the decision on the Ecotox Centre strategy might exacerbate the perception that the Ecotox Centre is not independent.

We believe that the role of the Advisory Group should continue to be focused on informing the Centre about the current and future needs of the stakeholders. On the other hand, the Advisory Group should also take into account the innovative developments from the Ecotox Centre that might be useful to them. As a reminder, the Centre represents an important bridge between research and practice in the field of ecotoxicology. Its expertise is a real asset which should help inspire stakeholders in their own



development in this field. This can only be done through clear two-way communication between the Centre and its stakeholders intended to further evolve and improve the collaboration. To achieve that, we do not believe that the composition and size of the Advisory Group should be changed, but rather that the Advisory Group and the Centre should both be proactive in their exchange. We equally believe that each member of the Advisory Group should help to promote the Ecotox Centre within their own network. This would increase the visibility of the Ecotox Centre at the national and even international level and facilitate cooperation between the different parties.

Strengthening of collaborations, synergies and our communication/visibility:

It is obvious that, given the limited resources and staff the Ecotox Centre must maintain its cooperations with universities of applied science, authorities and industries and to optimize output. We agree with the various recommendations made. Concerning the recommendation to increase collaboration with SCAHT, we would like to state that the Ecotox Centre and SCAHT are already engaged in regular exchanges. We will continue and intensify such collaborations and benefit from synergies. In the same manner, we will continue our communication efforts towards stakeholders and the general public. We have already considered different options to increase the visibility of the Ecotox Centre and to proactively inform stakeholders about projects (e.g. open access webinars, Infotag specific to the Ecotox Center).

We would also like to point out that we already have a well-developed network of collaboration allowing the realization of a broad spectrum of projects. This includes projects with industries or private companies. For example, we are supported by a consortium of car tire producers to assess impacts of tire particles in the environment. We were also granted a project by a consortium of European Petroleum Refiners to conduct an external review of effect-based methods for refinery effluents. Furthermore, we assist in the transfer of technologies to private companies. Of course, it is in our interest to expand and strengthen our network, and the members of the Advisory Group could play an important role in this (see comment in the section “*Composition and Tasks of the Advisory Group*”). Likewise, strengthening of networks would benefit from increased funding (see “*Staff structure and funding in relation to the broad portfolio*”).