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EUROPEAN COMMISSION DIRECTORATE-GENERAL FOR EMPLOYMENT, SOCIAL AFFAIRS AND INCLUSION Employment Health and Safety

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Thursday, June 3, 2021

Feedback from the European Association of Hospital Pharmacists (EAHP) and the European Society of Oncology Pharmacy (ESOP) concerning the Study supporting the assessment of different options concerning the protection of workers from exposure to hazardous medicinal products, including cytotoxic medicinal products

Dear Mrs Charlotte Grevfors Ernoult,

We are writing to you again today to reaffirm our great interest in a protective framework for health workers in all parts of the supply chain and to encourage you to take more comprehensive steps against exposure to hazardous medicinal products.

You have known the concerns of the European Association of Hospital Pharmacists (EAHP) and the European Society of Oncology Pharmacy (ESOP) since the personal conversation that we had years ago with you and representatives of both our associations in Luxembourg. You are also aware of our common interest in finding uniform ways for all employees in the cancer treatment chain. We are now shocked to see that none of our concrete proposals, which also led to resolutions in the European Parliament, have been considered in the report for the 'Study supporting the assessment of different options concerning the protection of workers from exposure to hazardous medicinal products, including cytotoxic medicinal products' that was commissioned by you. There is no basis in the fact that, despite multiple indications from the ranks of the independent experts, a sustainable study of the stress conditions has still not been carried out.

We have done very carefully everything in our ability to follow the European Parliament's mandate to shed light on the question of possible contamination with cancer-causing drugs. It is not only due to the adverse conditions under the COVID-19 pandemic that no more indepth investigation and discussion were possible and feasible to gather satisfactory findings. But also the survey set up which gave interested companies a great deal of intervention rights¹ and the fact that the report was not made available for review to the experts that contributed before its publication lead to a very unsatisfactory outcome.

In one of our previous communications, we had explicitly asked for an integrated investigation that had four components:

- 1. Determination of possible aerosols,
- 2. possible surface contamination,
- 3. possible blood changes and
- 4. possible cytostatic concentrations in the urine.

The report that you have published does not only omit to consider these very relevant suggestions, but it also culminates in a note that you want to protect employees with plastic devices that suggest safety (CSTD). All independent studies however have shown that this assumption is incorrect.

We are deeply disappointed that by endorsing and publishing this study the organs of the European Commission allow themselves to be influenced by the interests of industry against their better judgment, to the detriment of the budgets of the health ministries of its member countries.

We hereby request you to put the report under lock and key immediately and to take part in an expert discussion with MEPs that looks further at the issue of the protection of workers from exposure to hazardous medicinal products.

We would also like to encourage you to further analyse the reality of exposure to hazardous medicinal products in a comprehensible manner for all parties involved with a fundamental investigation.

With kind regards,

Klaus Meier ESOP President Petr Horák EAHP President

¹ We had been calling for the disclosure of conflicts of interests, including monetary payments, for all involved parties in the study which had not been taken into account by the consortium responsible for carrying out the study.