

Re-registration as toxicologist (ERT) in The Netherlands – objective, transparent and quantifiable

By *Martijn van Velthoven, MSc, ERT, chair of the NVT Registration Committee*

Re-registration as European Registered Toxicologist (ERT) in The Netherlands can only be done via the online registration tool 'PE Online' as of 1 January 2024. Until that date, re-registration via the re-registration form (available online at NVT) will also be accepted.



On behalf of the Registration Committee, I would like to thank the TCDD editorial board for this opportunity to explain the changes related to re-registration using the PE Online system. Before going into more details, I would like to express my gratitude to Dr. Paul Scheepers and Dr. Josje Arts, my predecessors in the Registration Committee who dedicated a lot of efforts, thoughts and time to develop the online registration system, including development of explanatory documentation and guidance.

It should be emphasized that the re-registration requirements as described here are nothing new. However, by using this new approach that is being implemented, the harmonized professional requirements that have to be met to remain registered as a EUROTOX Registered Toxicologist will become more objective, transparent and quantifiable.¹ The Registration Committee of the NVT is working on a more elaborate guidance on how to re-register via PE Online.

The requirements to qualify for the 5-year re-registration as a EUROTOX Registered Toxicologist (via the NVT national registration) contain the following elements:

One should have been actively working as (eco) toxicologist in the last 5 years:

To assess this, the applicant should provide the following information:

- The number of hours actively working as (eco)toxicologist, which should be at least 16 h per week (or an equivalent number of days per year);
- A description of his/her (eco)toxicological working activities (recommendation: 300-400 words).

The Registration Committee of the NVT advises applicants to be as specific as possible in the description of their toxicological working activities. This enables the Registration Committee to review what activities related to (eco) toxicology have been carried out during the past five years, including an estimate of the number of hours per week spent on these activities.

Example: *'working on health risks of hazardous chemicals at 30%'* will need to be specified regarding what activities have been done.

Specification of activities is also of importance in case one contributes to working groups, scientific panels, scientific reports, etc. in order to judge the toxicological content of that work.

This implies that someone originally trained as (eco) toxicologist, but currently full-time working as manager of a group of (eco)toxicologists, cannot be considered as an active (eco)toxicologist anymore and does not qualify for ERT re-registration any longer!

One should show that sufficient Continued Education has been followed in the past 5 years ('receiving activities'):

With regard to Continued Education (CE), also known as Continued Professional Development (CPD) an applicant for re-registration should indicate what activities have been done in the field of (eco)toxicology during the past 5 years.

General courses on personal and/or professional development not related to (eco)toxicology (e.g. a project management course, leadership training) are not considered as continuing education for the ERT re-registration purpose!

One should show that one has sufficiently contributed to the field of toxicology in the past 5 years ('sending activities'):

With regard to Active Contribution, an applicant for re-registration should indicate what activities have been →

done to actively contribute to the field of toxicology (such as presentations, (co)authoring publications, acting as reviewer, being an expert during a court case, contribution to a PET course, being a member of one of the NVT committees, etc.). These activities should be related to the field of (eco)toxicology during the past 5 years.

The credit point system for the Continued Education and Contribution to the field of toxicology

In the past couple of years, the Registration Committee noted that there was a large discrepancy in the applications for re-registration:

- some applicants provide a very detailed description of continued education and contributions to the field of toxicology (including all additional documentation to justify these requirements for review by the Registration Committee members); whereas
- other applicants made a very concise 1-page summary (e.g. referring to their working environment for active contributions and summarizing continued education as: 'reading scientific articles' and 'attending all NVT annual meetings').

Therefore, the Registration Committee decided that a system needed to be developed that facilitates an objective review of the applications for ERT registration renewal. Such a system should allow a more transparent way of evaluating whether applicants fulfill the requirements with regard to continued education and contributions to the field of toxicology.

For this a credit system was developed: activities considered to be active contributions to the field of toxicology ('sending') or continued education ('receiving') should

be listed and are eligible for credit points (where 1 credit point reflect 4 working hours (i.e. half of working day)). On average, each year 10 credits need to be obtained (50 credits for the 5-year period), of which 4 credits need to be obtained for continuing education and 4 credits on contribution to the field of toxicology. The additional 2 credits can be obtained for either 'receiving' or 'sending' activities or both. Credits can be transferred from one year to the other within each 5-year period (thus e.g. a total of 8 credits in 2021 and a total of 12 credits in 2022). It is, however, not permitted to transfer credits used for a previous registration period to the next 5-year period.

In the table below the minimum credit point requirements for re-registration are presented.

Period	Receiving	Sending	Receiving or Sending	Total
Per year	4	4	2	10
Full 5-year registration period	20	20	10	50

This credit system was already presented during the EUROTOX 2018 in Brussels, Belgium² and published³. These details have been implemented in the PE Online system to facilitate the application of re-registrants.

The expectations of the Registration Committee

Continuing education ('receiving' activities)

For professional development as (eco)toxicologist, an applicant for re-registration should indicate what activities have been done related to continuous education in the field of (eco)toxicology during the past 5 years.

The Registration Committee encourages applicants to follow training courses on (eco)toxicological topics outside their current field of expertise to broaden their view on (eco)toxicology and to take notice of recent developments.

For (eco)toxicology-related receiving activities one could think of attending courses, conferences, workshops, trainings, NVT (subsection) meetings, etc. For each 'receiving' activity you need to provide evidence: e.g. program of the course or workshop in combination with a certificate of attendance and/or proof of payment.

Contribution to the field of toxicology ('sending' activities)

An applicant for re-registration should also indicate what activities have been done to actively contribute to the field of toxicology ('sending' activities). These activities should be related to the field of (eco)toxicology and include a.o. presentations, (co)authoring publications, acting as reviewer, being an expert during a court case, contribution to a PET course, being a member of one of the NVT committees, etc.

Also, for each 'sending' activity evidence is needed. This can consist of proof of e.g. a program/ agenda of the meeting with the name of the presenter, an abstract of the publication of which one is (co)author, or an acknowledgement for a reviewing activity for a scientific journal.

Many common toxicology-related journals are included (and can be selected) in the online system. In case a publication is issued in a journal that is not listed in the online system, the link to the website of the journal should be provided by the applicant.

Portfolio assignment of credit points ('sending' or 'receiving')

Although the Registration Committee has tried to cover as many sending and receiving activities as possible, not all activities for which credit points can be obtained will have been listed. Such remaining activities can be described in the portfolio section. →

Also, the portfolio assignment can be used to include a (long) list of publications, which may be more convenient than adding each publication as a single entry.

These (eco)toxicology-related activities need to be well described and supported by evidence.

Some (non-limited) examples are:

- Toxicological advice
- Membership of a toxicology-based committee/working group/expert group/task force in industry organizations (e.g. VNCI, AISE, Cosmetics Europe, CEFIC, CEPE, etc.
- Attendance of a committee/working group of national or international organizations such as ECHA, EFSA, Gezondheidsraad, IARC, OECD, etc.
- (Co-)author of a textbook (or chapter) for (education in) toxicology
- Toxicological reports prepared as Study Director (these should be summarized in a list with titles, for example as follows: Report of a 90-day oral toxicity study with Substance X in rats, according to OECD guideline ...).

Please also note that applicants may claim confidentiality. However, in order to apply for credits, it is expected that the applicant will provide the required information in a general way to ensure the Registration Committee members can evaluate what has been done without having to use confidential details (such as name of substance).

For each of these activities in the portfolio assignment, the applicant can propose the number of credit points (as long as it can be justified by the applicant to be in line with the 4 working hours per credit point).

Please note the portfolio assignment is meant for obtaining

the last missing credits to arrive at the minimum because preparation of reports of (eco)toxicity studies, attendance of certain committees, or providing (eco)toxicological advice may be part of daily work activities. It is therefore required that the majority of the credits is earned at sending and receiving as indicated in the Tables in the Annex.

Assessing re-registration by the Registration Committee

Credits allocated by the applicant will be checked by the Registration Committee. For each dossier, two members will review independently before discussing their findings in the Registration Committee meeting.

Please note that the Registration Committee members assigned to your dossier will also have to approve the activities eligible for credit points. This evaluation will be based on supporting documents as indicated above. These supporting documents should be uploaded in the PE Online system.

To avoid delays in your re-registration, please make sure that your dossier is kept up to date on a regular basis. This will avoid that you miss out on credit points necessary for your re-registration and it will allow the Registration Committee to keep a 'running review' of your dossier and to update your dossier 'dashboard' in PE Online. This dashboard shows the progress of your dossier and will make it easier for the applicant to see what activities to focus on before the 5-year period has passed.

COVID-19 considerations (based on the EUROTOX Executive Committee letter from December 2020)

The COVID-19 pandemic has severely affected normal Continued Education opportunities with the cancellation or postponement of many congresses and meetings combined

with local measures and travel restrictions. On the other hand, many organizations have quickly moved to provide alternatives such as virtual meetings, webinars and other online offers, providing ample possibilities for continuing education.

The EUROTOX Executive Committee and the Registration Subcommittee are mindful of the challenges that this poses to all toxicology professionals and have offered some guidance to the National Registers. First and foremost, Continued Education remains the cornerstone of maintaining professional competence for ERTs. However, for the year 2020, the requirement for CE will be handled flexibly and according to national and individual circumstances. The educational hours spent participating in online offers should count in full, provided that there is a clear link to toxicology.

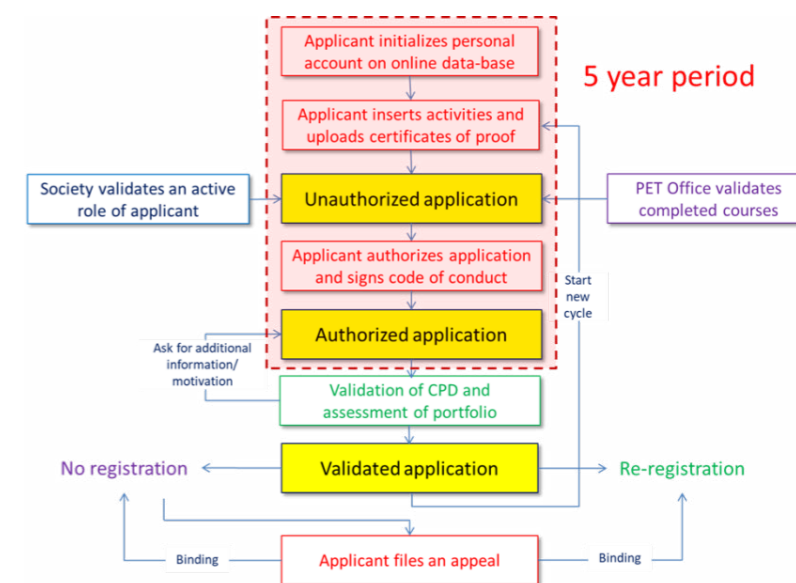


Figure 2. Flow diagram of the re-registration process. Different colors indicate the various roles: applicant (red), Society (blue), PET-Office (purple), RT (green).