

Main points of the criticism of the DCSD ruling (points in brackets refer to paragraphs in the Ministry's assessment)

A number of points include serious criticism of the DCSD:

- The DCSD has not substantiated its ruling. Dr Lomborg has not been told exactly where he has, allegedly, made mistakes. This is a case of *"significant neglect in case processing by the DCSD"*. *"Here the Ministry must point out that the DCSD has not documented where the respondent (BL) has allegedly been biased in his choice of data and in his argumentation, and that the ruling is completely void of argumentation for why the DCSD find that the complainants are right in their criticisms of BL's working methods."*(point 6.1.)
- The DCSD's division into objective and subjective dishonesty in its ruling on Dr Lomborg's book *"could present a misleading picture of the actual conclusion"*. This has been the case to a great extent. The actual conclusion is that *"there is no scientific dishonesty"*. This is not the picture presented to the public by the DCSD ruling. (point 5.1.3.)
- In its ruling, the DCSD emphasises that scientific work should go through "peer review". Nevertheless, the DCSD omits to examine whether this has happened in the case of Dr Lomborg's book. The Ministry describes this as *"dissatisfactory"*. Dr Lomborg's book was accepted at the Cambridge University Press *"after a thorough peer review by four recognised scientists"*. (point 6.5.)
- The DCSD's choice of language *"does not meet the linguistic standards of good administrative practice"*. The Ministry writes that *"the DCSD should be able to refer to the content of a criticism without using condescending or emotional language."* (point 6.7.)
- The DCSD decided to bring Dr Lomborg's case before three scientific committees instead of the usual one committee. The procedure for this decision was not correct. It is emphasised that *"the ruling must be carried out by the one committee, whose working area is in accordance with that of the respondent"*, and the respondent can not be judged *"according to another norm, than the one which is valid for the subject area of the respondent concerned"*. (point 5.1.4.)
- The people who have complained about Dr Lomborg have been incorrectly treated as "parties" to the case. This means that they have been heard to an extent they have not been entitled to. This could have meant, *"that the DCSD has imputed too much emphasis on the evaluation of the complainants and this can have resulted in an extension of the time period needed to process the case"*. (point 6.2.)
- The Ministry overrules the four criteria, which are stated by the DCSD as the reasoning for treating the complaint and concludes, that the DCSD has not *"documented that the work of the respondent falls within the field covered by the competencies of DCSD."*(point 6.4)
- Criticism of the fact that the chairman of the sub-committee in the case of Dr Lomborg came from the health sciences and not from the social sciences, which is Dr Lomborg's field. (point 6.6.1.)
- It was *"clearly wrong"* that Dr Lomborg was not heard before public disclosure of the DCSD ruling. (points 6.6.2. and 6.8.)
- The DCSD has not taken a position on whether the complaint regarding Dr Lomborg's reader's letters in the press should have been dismissed. This *"was a mistake"*. (point 6.3.)
- In its ruling, the DCSD cannot take a position on whether Dr Lomborg's book is contrary to good scientific practice. (point 5.1.2.)
- Since Dr Lomborg's book was published outside Denmark, it is doubtful if the DCSD has the competence to try the case. The DCSD ought to have checked this. (point 5.1.5.)
- The DCSD did not check whether Dr Lomborg's book fell within the field covered by the DCSD's competence, ie. if the book was a scientific work rather than a debate book. (point 6.4.)