

14 July 2017

Vytenis Andriukaitis
Commissioner for Health and Food Safety
European Commission
Rue de la Loi 200
1049 Brussels

Meeting follow-up: Current challenges in the regulatory framework for crop protection products and the impact on innovative solutions for farmers in the European Union

Dear Commissioner Andriukaitis,

We would like to express our thanks to you and your team for taking the time to meet with us and for allowing us the opportunity to provide our perspective on a range of current and future issues. We very much welcomed the frank discussion and hope that this will become a regular dialogue. As you rightly pointed out during the meeting, communication among all stakeholders is key to fostering understanding of how to best support agriculture, the environment and communities. Only through meaningful dialogue, cooperation and collaboration between all interested parties, including NGOs, farmers, industry and politicians / regulators, can we achieve mutual agreement towards pragmatic solutions.

As you may recall, our key concern is the increasingly conservative, politically-driven, hazard-based control system in Europe. Like you, we wish to see Member States meeting their responsibilities and a return to a science-based approach that allows you as the risk manager to make evidence based decisions. As responsible businesses, we welcome good regulation that protects people and the environment, but also drives innovation and growth. We share your commitment to these goals.

We wish to re-emphasize, for the sake of absolute clarity, the following topics discussed during our meeting:

- Guidance used to inform regulatory decisions must be workable and achievable. And guidance that is to be used in the regulatory process must be endorsed by the Member States prior to any use.
- We urge you not to seek further restrictions on neonicotinoid pesticides, especially if proposals continue to be based on the unapproved and unworkable draft bee risk guidance document. We continue to believe that these products can be used safely, without unacceptable risk to bee populations. As the main author of the recent CEH study wrote *"Don't give up on neonicotinoids. Neonicotinoids do have a vital role to play in food production. As they can target particular insects they can be used in low dosages, reducing the need for broad spectrum insecticide sprays. They are also useful in controlling pests which have already developed some resistance to other pesticides."*¹ Seed treatment has a wide range of benefits, not least removing multiple tractor spray runs through fields, thus reducing greenhouse gas emissions and reducing soil compaction with risk of soil erosion and impact on biodiversity. Effective and implementable mitigation measures such as dust deflectors, pollinator strips or appropriate follow-on crops are available to further reduce the environmental exposure. We strongly believe that neonicotinoids can be safely and beneficially used.
- Hazard-based cut-offs should not be used by the EU to introduce trade barriers or satisfy political objectives. It's important that we all work to counter emotive messaging used by some groups and explain that hazard does not equate to risk. Food in the EU is amongst the safest in the world and, as demonstrated by the EFSA annual reports, pesticide residues are virtually always within the conservative safety limits that we have in Europe.

¹ Woodcock, in 'The Conversation' [Click here](#)

- We recognize your approach to the adoption of criteria for endocrine disruptors and appreciate the challenges that you face. Whilst we regret that potency is not part of the consideration, we again urge you to bring forward the second part of the package as soon as is possible in order to ensure that negligible risk is a factor in assessment.
- And as you move through the REFIT exercise for 1107/2009, we ask that you consider the immediate improvements that may be made in the current system to make it timelier, consistent and predictable; as well as look to secure long term improvements that will help the transparency and effectiveness of the regulation. For instance, we welcome moves towards data transparency as long as these are applied sensibly and afford appropriate confidentiality for data sets and information that are commercially sensitive. We also urge you to look to global best practices, such as the American and Canadian data call-in systems that help to ensure that risk assessors and managers have the very best information at their disposal.

Our commitment to you remains clear. We heard your messages and will act upon them. We're especially keen to collaborate and to publically demonstrate our approach to business. Both of our companies operate with the highest standards of stewardship, safety and proper practice and will continue to do so. We aim to continue to innovate in order to help solve some of the major societal challenges the world faces with a focus on feeding a growing world population in a more environmentally sustainable manner. Our mission is to ensure that farmers can work the land without fear for their own well-being and provide communities with safe, nutritious food at reasonable prices.

Our teams will be in touch with yours to further discuss specific points, but please don't hesitate to contact us directly if we can be of assistance.

Yours sincerely,



Erik Fyrwald
Chief Executive Officer
Syngenta



Liam Condon
Member of the Board of Management of Bayer AG
and President of the CropScience Division