

Neil Thornton
Director, Food and Environmental Risk
Department for Environment Food & Rural Affairs
Nobel House
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London
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August 2, 2013

Neonicotinoid insecticides and pollinators

Dear Neil,

Thank you for your letter of July 25, 2013 on neonicotinoid insecticides and pollinators and your request to discuss our plans for further work in the context of the revised regulatory requirements and the EU's 2015 review.

Syngenta is absolutely committed to improving the health of pollinators which are essential to our own business as well as to the sustainability of agriculture and society. It is for this reason that we developed and rolled out Operation Pollinator across Europe over the past 10 years (www.operationpollinator.com). In doing so, we have worked with farmers and growers to put back pollen and nectar rich margins alongside fields thereby addressing one of the most important factors involved in the decline in pollinator health – the loss of habitat and nutrition.

You will therefore understand our disappointment in the European Commission's decision to ban the neonicotinoid insecticides, including thiamethoxam. We are now committed to doing everything we can to secure the future of our product in the EU, including responding to the new regulatory requirements for the proposed 2015 review.

In this respect, we have already established a program of study work in the United Kingdom and also in Germany. For your information, the German authorities appear to making every effort to have the ban on the use of neonicotinoid insecticides on oilseed rape lifted as soon as possible.

My colleagues and I would therefore welcome the opportunity to discuss this work program with you to ensure it makes a significant contribution to the robust science base to which you refer in your letter.

However, you should be aware that the recently published EFSA Bee Risk Assessment Guidance Document does not provide the clear practical guidance that we need for our study work for the 2015 review. Indeed without such clear guidance we all run the risk of new data being rejected in the same way that the existing evidence was discounted during last year's review of the neonicotinoid pesticides by EFSA.

I would therefore urge you to review the latest guidance from EFSA which, in our view, poses an extremely serious threat to the approval of not just the neonicotinoids, but all insecticides and many fungicides and herbicides. I trust you will agree that the approach taken by EFSA

is extremely conservative, impractical and completely disproportionate to the risk posed by pesticides to bees. If implemented as currently drafted it will certainly have a bearing on any study work being planned for neonicotinoid pesticides like thiamethoxam.

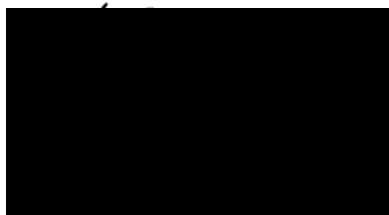
I would therefore encourage the UK to raise any concerns it may hold with the European Commission on the EFSA bee risk guidance document. There is still an opportunity in the early autumn to re-calibrate the approach into something more proportionate and practical but it will require another concerted effort from Member States. Otherwise, I firmly believe the economic and environmental sustainability of agriculture in Europe is likely to be seriously undermined.

In the meantime, I would urge the UK to connect with Germany and make a combined request of the Commission to quickly set out the 'rules' for the current study work program and to clearly establish the process and timescales for the 2015 review.

I am sure you will agree that there is much for us to discuss around these topics and look forward to meeting. I would be happy for you to involve Bayer and the Crop Protection Association but suggest that we do not allow diary coordination to prevent us meeting at the earliest opportunity.

My assistant, [REDACTED], will be in touch with your office to agree on a date.

Sincerely,

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