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20 December 2012

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POST

Rt. Hon Owen Paterson MP
Secretary of State
Department for Environment Food & Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

Dear Secretary of State

Publication EFSA review of neonicotinoid seed treatments

As you will no doubt be aware, the European Food Safety Agency will shortly publish its review of the alleged risk to bee health of neonicotinoid seed treatments. Although we do not believe that the Agency will conclude that this important technology is unsafe they are likely to have adopted an extremely precautionary and highly theoretical approach. This will no doubt leave space for different interpretations but I trust that the Government will evaluate EFSA's report in a pragmatic way.

In doing so, I would urge you to consider the fact that these seed treatments, including our own Thiamethoxam, (TMX) have been used safely across millions of hectares of European crops for over 10 years. They are one of the most innovative forms of crop protection technology due to their extremely low dose of active ingredient, long lasting effect, and the fact they reduce the number of sprays required during the growing season. Used properly there has never been a single verified case of damage to bee populations.

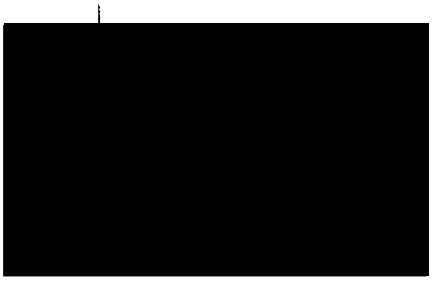
This is clearly demonstrated by data from Syngenta's own in-field trials and the extensive monitoring program put in place to support the use of Thiamethoxam on maize over the past 4 years in France. For your information, this monitoring data is available to all Member States on the CIRCA team space[1].
The value of neonicotinoid seed treatment technology is underlined by a forthcoming study from Humboldt University and a-connect which we understand will be published early in 2013. This shows that without the technology serious socio-economic and environmental damage could be inflicted. This includes the fact that:

- British crops like winter wheat, oilseed rape and sugar beet might become unsustainable due to yield reductions of up to 40% and the significant, if not complete, erosion of grower margins;
- Up to £14bn of economic value could be lost over the next 5 years across Europe;
- 50,000 jobs might be lost in agriculture, particularly in Eastern Europe, with up to 1 million jobs impacted by reduced income; and
- 3.3m hectares of additional land may have to be brought under cultivation outside of Europe at a cost of 600 million tons of CO^2 emissions to make up for the lost EU agriculture productivity.

[1] CIRCA is the teamspace for Member States to post regulatory documents and this means the report is visible to all.

It is also worth remembering that the European Commission gave EFSA just a few months to complete the review of neonicotinoid seed treatments. Many Member States argued that this was an extremely challenging deadline and were unable to assist with the review. In addition, the mandate provided by the Commission appeared to push the Agency toward a very conservative and highly theoretical assessment of the risk posed by neonicotinoid seed treatment technology to bees.

Any new data gaps or risks identified are only likely to have emerged because of this very conservative and highly theoretical approach. Nevertheless, Syngenta is fully prepared to discuss the EFSA report with you, and your authorities, and to contribute to the development of a pragmatic response from the Government. Such a discussion should take place in early January ahead of the EU Standing Committee meeting, when the EFSA review will be on the agenda.

Syngenta strongly believes that sustainable food production and – indirectly our business – depend on thriving bee populations but we also need safe, innovative pesticides like neonicotinoid seed treatments. I will contact your office in the New Year to arrange an opportunity to discuss the response to the EFSA review.

Yours sincerely