

Commissioner John Dalli  
European Commission  
B-1049 Brussels  
Belgium

Basel, June 8, 2012

Dear Mr. Commissioner,

I am writing to you with respect to an urgent matter involving Syngenta and one of our products, and believe your direct involvement is necessary to uphold the principle of science-based decision making in the EU regulatory process.

As you might know, last Friday the French Minister of Agriculture announced his intention to withdraw the registration of our product, the seed treatment Cruiser OSR®, which contains the active substance thiamethoxam. Given that this decision was taken in the absence of any validated science whatsoever, it was, in our view, a dark day for both French and European agriculture.

By coincidence, it was less than two weeks ago that I sat alongside EU Council President Van Rompuy, European Commission President Barroso and French President Hollande at the G-8 meeting in Camp David as a guest of US President Barack Obama. I was at the Saturday lunch to discuss the contribution that the private sector, including Research and Development companies like ours, can make toward global food security, particularly for Africa, where we have just now committed to spend \$500 million over the coming decade. The G-8 members were urged to support progressive principles, including robust regulatory frameworks, to best enable food security.

Indeed these recommendations were completely aligned with the many supportive comments that you also made when we last met with other agricultural technology leaders in your Brussels office last August 29<sup>th</sup>, wherein I recall you underscored the importance of backing the scientific integrity of the regulatory institutions such as EFSA. I hope you can appreciate the extraordinary perpendicularity of this orientation to the situation we now face.

Neonicotinoid seed treatment for oilseed rape, (which includes Cruiser OSR®), has been used safely for over 10 years on approximately seven million hectares across the EU without any bee incidents and avoiding yield losses which can be up to 30%. The loss of this technology will cost farmers and consumers up to €1 billion and undermine the production of safe and affordable food.

The proposal to suspend Cruiser OSR® is based on a single, experimental study which incorporated a purposefully high and unrealistic dose rate to deliver a pre-ordained outcome. We believe the sole aim of this study was to create doubt about this product despite much data developed over many verifiable, field-based studies which completely refute it.

You will know that the ANSES written report agrees with this conclusion and, moreover, EFSA itself has warned against drawing conclusions from a single study which would have to be replicated in different, practical field circumstances and with other dose rates. Even the French statements themselves do not refute this contention.

I recognize that some Member States, driven by a small group of activists and hobby bee-keepers, are lobbying you to suspend Cruiser OSR® and indeed the entire class of neonicotinoids. I urge you, in the strongest possible terms, to resist this pressure. To do otherwise, would completely undermine the integrity, credibility, and robustness of the EU regulatory process. This would set a disastrous precedent with impact on agriculture and the whole environment for research, development, and innovation in the EU.

As my colleagues already confirmed to you, we are absolutely committed to sustainable agriculture and the essential role played by pollinating insects like bees. We have done more than most to scientifically understand bee health in the context of productive agriculture and have already put in place tractable and verifiable solutions which are today making a substantial difference.

Bans are easy to put in place but harder to lift. A ban on Cruiser OSR® and other neonicotinoids would be without any credible scientific basis and do absolutely nothing to improve bee health.

I shall be pleased to discuss this matter with you directly if it would be helpful to further clarify what more we might do to effect a coherent approach between the EU and Member States on product registrations, which continue to move unpredictably between the scientific and political spheres.

Yours sincerely,

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