

To: Commissioner Máire Geoghegan-Quinn, European Commission
Commissioner Dacian Cioloş, European Commission

Wednesday, November 21, 2012

Sustainable intensive agriculture— EFSA review on neonicotinoid risks to bee health

Dear Commissioner Geoghegan-Quinn,
Dear Commissioner Cioloş

Syngenta believes that insecticides, in particular neonicotinoid based seed treatments, are an essential contributor to sustainable intensive agriculture and do not damage the health of bee populations. They do however significantly reduce the load on the environment when compared to other pesticides as well as delivering significant socio-economic benefits.

Although several Member State Governments, reputable universities and experts across Europe share this view, there are a small number of vocal individuals and groups who continue to suggest the opposite. In recent years these groups have skillfully leveraged media reporting of individual alarmist studies despite the fact that they are typically based on completely unrealistic dose rates and/ or the forced exposure of bees to the insecticides in question.

In response, the Commission promised a comprehensive review of neonicotinoid based pesticides to fully understand their impact on bee populations. Given the importance of bees in agriculture, Syngenta supported this intention. However, the ability to carry out such a review was compromised by the need to publish the findings before the end of 2012. This put enormous pressure on EFSA and resulted in a number of key Member States refusing to support the process within these timescales.

As a consequence, the scope of the review was narrowed to just three of the five commercially available neonicotinoid based pesticides which happen to be the three currently used for seed treatment. This includes Syngenta's Thiamethoxam. The justification offered for this selection is that these three exhibit the higher level of acute toxicity. This criterion immediately makes the review "hazard based". This is exacerbated further by the fact that EFSA appears to be using its new, extremely conservative, and impractical, bee risk assessment guidance document, which is still in draft and not yet approved by the Member States, to inform its review of the neonicotinoid seed treatments.

All of this is desperately disappointing given the intention to conduct a comprehensive review of the risk to bee health.

We are obviously now concerned that an innovative active ingredient like Thiamethoxam may be penalized despite its excellent use characteristics: an extremely low dose; long lasting protection against pests that destroy crops; and used in the safest possible way through seed treatment resulting in fewer insecticide sprays over the course of the growing season. The safety of Thiamethoxam for bees is reinforced by years of extensive monitoring in the field and based on millions of hectares of treated seed use without a single substantiated report of hive destruction.

If neonicotinoid seed treatments like Thiamethoxam are restricted, farmers will have to use insecticides which have a higher environmental load, perversely increasing the risk to bee health.

Independent analysis also suggests that there would be significant damage (perhaps more than €17bn over the next 5 years) to European agriculture and the wider economy.

Productivity in key crops like corn, winter wheat and barley, oilseed rape, sugar beet, and sunflower would fall by up to 40%. Grower margins would be eroded forcing them to scale back or end production of certain crops like OSR and Beet in many parts of Europe. Others would go out of business. Europe's export of wheat and barley would drop whilst net imports of corn and soybean would increase significantly, particularly for animal feed. In addition, Europe's world leading corn seed production industry, which makes a strong contribution to the economies of France, Hungary and Romania, would be seriously damaged and would possibly relocate outside of the EU.

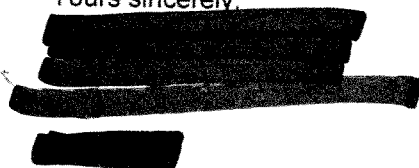
In our view, it is therefore necessary to conduct the comprehensive review that was initially foreseen to avoid the risk of arriving at the wrong conclusions from a rushed process that could have disastrous implications for agriculture and ironically for bee health. It's clear that we need healthy and thriving bee populations. The sustainability of agriculture and – indirectly our business – depends on this. But we also need safe, modern, and innovative pesticides like Thiamethoxam if we are to produce the food we need. Rather than looking at the theoretical hazard we need to look at how bees and pesticides co-exist together in a sustainable agriculture system.

Given our determination to look at farming in a holistic way I would like to assure you that we are open to work with any stakeholder who shares our goal of sustaining a thriving bee population in a sustainable agriculture system where the safest and most innovative pesticides are used.

Nevertheless, I would call on you to ask DG SANCO to extend the timescales and remit given to EFSA to ensure the comprehensive review on pesticides and bee health, which was initially promised, can be carried out. This would ensure that a holistic view emerges and informed decisions can be taken.

For your information, this letter is being sent to Minister of Agriculture across Member States.

Yours sincerely,

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