



Dr. Thilo Bode
Foodwatch Deutschland

via action@foodwatch.org

Dear Mr. Bode,

We appreciate your letter on the topic of pesticide regulations and questions as to why regulations differ from country to country. This is a critical topic that deserves more public attention. As a company that has made significant investments to ensure public safety, we thank you for shining light on it and we welcome the opportunity to showcase the work we have done in this area.

In your letter, foodwatch International is connecting more than 200,000 deaths to pesticide application. It looks like your figures are based on studies into intentional suicides in the 1980s, not accidental poisoning. We have not found any reliable contemporary evidence or data to substantiate your claim¹. We agree the common goal is that nobody suffers from applications of crop-protection products. Therefore, let's not burden the discussion about best ways to improve safety with unsubstantiated accusations.

Our goal is to help ensure that farmers can provide affordable, nutritious, safe and sustainable food from the field to the plate in communities around the world, including in emerging and developing countries.² To accomplish this goal, farming communities often face many challenges, including extreme weather, weeds, insects and plant disease. Crop protection is an essential tool that helps farmers overcome these challenges to produce enough food on existing farmland, which can

//////////

July 24, 2019

Liam Condon

Member of the Board of
Management of Bayer AG and
President Crop Science

Bayer AG
Alfred-Nobel-Str. 50
40789 Monheim am Rhein
Germany


www.bayer.com

Board of Management:
Werner Baumann, Chairman
Liam Condon
Wolfgang Nickl
Stefan Oelrich
Heike Schipper

Chairman of the
Supervisory Board:
Werner Wenning

Registered Office:
Leverkusen
Local Court of Cologne
HRB 48248

¹ <https://twitter.com/MartinMay678/status/1251158460911124484>

² <https://media.bayer.com/baynews/baynews.nsf/id/Bayer-committed-to-shaping-a-more-sustainable-food-system>



Page 2 of 7

reduce pressure on surrounding lands – and on the biodiversity those lands support.

Commitment to Global Solutions for Diverse Conditions

European regulations, which focus only on products for crops relevant in Europe, do not cover all globally occurring crop protection needs.

For example, in Africa the swollen shoot virus is a serious constraint to cocoa farmers' livelihoods.³ Central America and every country that plants bananas are fighting against the TR4,⁴ caused by the soil borne fungus *Fusarium oxysporum* f. sp. *Cubense*. In China and Mexico, citrus greening⁵ is destroying orange trees, and in Brazil farmers have to manage the fungus of Asian Soybean Rust.⁶ In tropical Asia, one recent study estimated that between 120 and 200 million tons of rice are lost yearly to insects, diseases.⁷

All these infectious diseases do not exist or are not relevant in Europe, but they require specific tools for farmers around the world. Without the relevant agronomic and environmental crop management solutions that help avoid damage to their crops, between 40 to 90 percent of their harvest could be destroyed. Would you propose that farmers in these regions should not have access to the tools to produce healthy crops simply because there is no need for them in Europe? Similarly, there are many products registered in Europe that are not registered elsewhere. Should your same logic apply to European farmers?

We believe demanding that only products that are registered in Europe be allowed to be used outside of Europe (or vice versa) would be irresponsible and detrimental to the global food supply and livelihoods of millions of farmers all over the world.

³ <https://www.worldcocoafoundation.org/blog/new-frontiers-in-the-fight-against-deadly-cocoa-disease/>

⁴ <http://www.fao.org/world-banana-forum/fusariumtr4/en/>

⁵ <https://www.aphis.usda.gov/aphis/ourfocus/planthealth/plant-pest-and-disease-programs/pests-and-diseases/citrus/citrus-greening/>

⁶ https://www.aphis.usda.gov/aphis/ourfocus/planthealth/plant-pest-and-disease-programs/pests-and-diseases/plant-disease/sa_soy_bean_rust/ct_soybean_rust

⁷ Savary, S., et al. 2000. Rice pest constraints in tropical Asia: quantification of yield losses due to rice pests in a range of production situations. *Pl. Disease*. 84[3]:357-369.



Page 3 of 7

Commitment to Safety

Despite the need to ensure diverse farm needs around the globe are met, we still apply globally consistent safety standards to our products, even when it means exceeding local regulations. In 2012, we made an industry-leading decision to stop selling products with high acute toxicity to humans (World Health Organization acute class 1 products). Since 2016, we have committed to sell only products with active ingredients that have a registration for use in at least one OECD country, or for new active ingredients with a complete (OECD) safety data package. Accordingly, our portfolio has undergone a significant evolution, and older active ingredients were consequently replaced by innovative solutions which meet the above criteria. If you are interested, we would be happy to discuss this in more detail with you.

We recognize the importance of safe application practices for the protection of farmers and their communities and acknowledge the continuous improvement and innovation in this area. We follow the highest standard of the Food and Agriculture Organization (FAO)⁸ on labeling references for our products and use these to advocate for label improvements. We place products in markets only when the required personal protective equipment has proven suitable and available in those countries.

We also foster the professional application of pesticides. In Africa, we support the CropLife Africa Middle East concept of Spray Service Providers (SSPs) who are trained and certified for applying crop protection products safely and advancing good agriculture practices. The SSP concept was successfully introduced in 14 African countries so far with more than 12,000 SSPs.⁹ Additionally, we continue to innovate with application technology. In Asia, for example, where smallholder farmers have historically relied on backpack sprayers, we collaborate with drone technology providers¹⁰ to ensure more precise pesticide application.

⁸ FAO Guidelines on Good Labeling Practices and the GHS.

⁹ <https://croplifeafrica.org/our-work/crop-protection/stewardship/spray-service-provider/>

¹⁰ <https://media.bayer.com/baynews/baynews.nsf/id/Bayer-XAG-collaborate-bring-digital-farming-technology-smallholder-farmers-Southeast-Asia-Pakistan>



Page 4 of 7

In compliance with the Food and Agriculture Organization of the United Nations' (FAO) Code of Conduct,¹¹ Bayer trained more than 1 million farmers around the world in 2019, focusing on training activities in countries where there are no statutory application protection requirements or certification for users regarding the safe handling of crop protection products. Bayer also organizes safety training for its own employees and contract workers from outside companies, in particular for sales team employees.

Bayer is operating an international supply network that adheres to a globally consistent set of high standards. Therefore, we firmly believe that the manufacturing of crop protection products in Europe that do not have a registration in the European Union is justified if meeting the criteria explained above and the receiving country has approved the product for its local conditions.

Commitment to Transparency

Regulatory systems for approval of crop protection products around the world aim to protect human health and the environment with thorough risk assessments and approvals that include measures to ensure safe use by farmers under policies from regulatory authorities.

In our internal safety evaluations, we continuously incorporate the latest scientific knowledge and apply criteria that reflect the different agronomic realities and farming systems. The underlying programs of authorities for regulating pesticides are well recognized. These include regulatory authorities of the following OECD entities:¹² US, Australia, Canada, EU, Japan, South Korea, New Zealand, UK.

Transparency and trust are important to everyone who works at Bayer. In 2019 we announced our public sustainability commitments² and in 2017, our scientists led the way in providing better access to safety-related information on our products through our Transparency Initiative,¹³ which makes safety-related Crop Science studies accessible online for anyone to see. The design, performance and reporting of the studies follow internationally agreed upon guidance, and they are conducted according

¹¹ < <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/pests/code/en/> >

¹² <https://www.oecd.org/about/members-and-partners/>

¹³ <https://www.cropscience-transparency.bayer.com/en>



Page 5 of 7

to international scientific standards, known as Good Laboratory Practice (GLP), that ensure data quality, integrity and traceability.

Commitment to Sustainability

Bayer's work in sustainable agriculture is founded in a commitment to achieve a balance between production and protection – in short, how do we feed a growing population without starving the planet? Farmers need help, and we are convinced that an innovative, safe and diverse set of tools can help them meet the need to produce enough food sustainably, despite pests, weeds and drought.¹⁴

Last year we engaged in discussions with authorities, farmers, scientists, shareholders and other civil society members to discuss how planetary boundaries are being exceeded and where agriculture can have a global impact as part of the solution. The result is a series of commitments including:¹⁵

- ☐ We will reduce the environmental impact of crop protection by 30 percent by 2030. We aim to achieve this by developing new technologies that enable farmers to scale down crop protection product volumes and enable more precise application.
- ☐ In partnership with farmers and our customers, Bayer will work toward reducing by 30 percent greenhouse gas emissions produced by key crops such as soy and corn in the main regions we serve by 2030. In addition, we are committed to becoming carbon neutral in our own operations by 2030.
- ☐ We want to support more than 100 million smallholder farmers in low- and middle-income countries by improving access to agronomic knowledge, products and services.

¹⁴ <https://croplife.org/wp-content/uploads/2018/11/Phillips-McDougall-Evolution-of-the-Crop-Protection-Industry-since-1960-FINAL.pdf>

¹⁵ https://www.bayer.com/en/our-commitments-on-transparency-sustainability-and-engagement.aspx?utm_source=vanurl&utm_medium=redirect&utm_campaign=tsecoms19&utm_content=omen



Page 6 of 7

- ☐ We will only commercialize products that meet the comprehensive safety and regulatory standards of a majority of reference authorities where registration is intended.

Commitment to Collaboration

Creating a more resilient and sustainable food system requires a concerted, collaborative and global effort. No one company, organization or government can do it alone. At the most basic level, we need to help farmers with tools suited to the unique challenges they face at the local level. That can only be done with diverse and commitment voices around the table.

Bayer continues to work collaboratively with farmers, food chains, NGOs and governments to deliver innovative solutions to make our food supply safe and reliable, so that consumers can have access to the nutrition they need.

Some recent examples include Bayer partnering with the Inter-American Institute for Cooperation on Agriculture and the NGO Solidaridad, as well as with other influential organizations, producer associations, members of academia and the private sector to help save the banana, a critical staple crop in many regions, from commercial extinction. We are also working with international stakeholders and development organizations to provide solutions to the current locust infestation in Africa and the Middle East.

In addition to working directly with diverse stakeholders to develop our sustainability commitments, we are inviting global experts and stakeholders to participate in a Bayer Sustainability Council to help shape further alignment between sustainability and business objectives. We are happy to provide regular updates on the progress of our measures in these areas.

Bayer's scientists and employees contribute to better lives for generations of families and local communities. Bayer is – and will remain – a place for people who want to set high standards and pursue innovative, more sustainable solutions for agriculture.

Just as we do not back away from the planet's most pressing issues, we will not shy away from questions, concerns and opportunities to



Page 7 of 7

collaborate on innovative solutions. With this in mind, we invite your organization to share with us your ideas to tackle the interrelated challenges of getting food from the field to the table; producing enough affordable, nutritious and safe food to feed everyone regardless of where they live; strengthening resilient food systems and advancing sustainable agriculture while respecting planetary boundaries in emerging and developed countries around the world.

We look forward to a continued dialogue on these important issues.

Sincerely,

