

## Crispin Dowler

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**From:** Alexander Hennig <alexander.hennig@bayer.com> on behalf of Alexander Hennig  
**Sent:** 09 November 2021 13:46  
**To:** cdowler@greenpeace.org  
**Subject:** AW: Neonic exports investigation Opportunity to Comment

Hi Crispin,

Here is our statement on neonicotinoids in general, on bee safety and on the export of plant protection products:

Neonicotinoids are an important tool for farmers since they help to control pests and to safeguard the harvests. While Bayer is accepting the EU decision to discontinue the approval of neonics, we would like to highlight that regulators worldwide have reconfirmed the safe use of these products after diligent review. Moreover, for some pests and diseases, there is still no viable alternative available that could replace neonicotinoids. These products are still needed which is also being demonstrated by the emergency derogations that were granted by the EU member states in 2021. Please note, that Bayer has not applied for these derogations, which were all granted by national authority decisions.

Bayer is committed to safe and sustainable use of its products and neonicotinoids have a long history of safe use if used according to label instructions. They are among the most intensively researched substances in the world. To mitigate potential risks for bees and other pollinators, Bayer put in place several measures. Just to give you some examples: Spray application must be strictly avoided in bee-attractive crops during flowering to avoid exposure for bees. Regarding seed treatment, we introduced the so-called Heubach test, which enables the measurement of dust abrasion of the treated seeds. We implemented innovation in seed coatings to improve adhesion. The result: seed coatings protect operators and beneficial insects from dust with emissions reduced by up to 95%. Two other innovations further reduced the amount of dust potentially released during planting.

You refer to the export of plant protection products that are banned in the EU. Let me give you a bit of context: The mere fact that a plant protection product is not authorized or banned in the EU says nothing about its safety. Many other regulatory agencies around the world also have very reliable, robust, carefully working and sophisticated regulatory systems in place to protect human health and the environment. Their safety ratings reflect the specific agronomic conditions in each country and the local needs of farmers. Examples of the different challenges caused by climatic conditions or crops are the recent locust plague in parts of Africa and Asia or the recent spread of the Fall Armyworm in Africa. We therefore support approval processes that follow high science-based standards. In both new registrations and re-authorization procedures, we weigh up whether a plant protection product is even relevant in a region.

There are clear national regulations as well as international regulations that we all strictly adhere to and sometimes even exceed. Bayer has stopped selling crop protection products that are classified as particularly toxic (Class 1) by the World Health Organization since 2012. Since 2016 Bayer has committed itself to only selling crop protection products whose active ingredients are registered in at least one OECD country. In addition, we are currently implementing the voluntary commitment announced in 2019 to only market crop protection products in developing countries that meet the regulatory requirements of a majority of renowned international approval authorities. These include the USA, Canada, Brazil, the EU, Australia, New Zealand, Japan and China.

Bayer conducts numerous trainings on the safe use of crop protection products in the countries of the global south. In the past few years, Bayer has regularly provided more than a million training courses per year. All approved active ingredients sold by us are safe for humans and the environment if they are used in accordance with the instructions for use. If we receive information that suggests improper use, we will of course follow up on these information locally.

Please understand that we don't comment on any volumes or numbers on sales and exports.

Best regards,  
Alex

**Alexander Hennig**

**Media Relations / Spokesperson, Crop Science Division**

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**Von:** Crispin Dowler <[cdowler@greenpeace.org](mailto:cdowler@greenpeace.org)>  
**Gesendet:** Montag, 8. November 2021 16:32  
**An:** Alexander Hennig <[alexander.hennig@bayer.com](mailto:alexander.hennig@bayer.com)>  
**Betreff:** RE: Neonic exports investigation Opportunity to Comment

Much appreciated, thanks Alex.

Best regards,

Crispin

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**From:** Alexander Hennig <[alexander.hennig@bayer.com](mailto:alexander.hennig@bayer.com)>  
**Sent:** 08 November 2021 15:31  
**To:** [crispin.dowler@unearthednews.org](mailto:crispin.dowler@unearthednews.org)  
**Subject:** AW: Neonic exports investigation Opportunity to Comment

Hi Crispin,

Thanks for you inquiry. I will come back to you by Wednesday.

Best regards,  
Alex

## Alexander Hennig

Media Relations / Spokesperson, Crop Science Division

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**Von:** Crispin Dowler <[crispin.dowler@unearthednews.org](mailto:crispin.dowler@unearthednews.org)>  
**Gesendet:** Montag, 8. November 2021 14:01  
**An:** Alexander Hennig <[alexander.hennig@bayer.com](mailto:alexander.hennig@bayer.com)>  
**Betreff:** Neonic exports investigation Opportunity to Comment

Dear Mr Hennig,

Please see my query in the email below. I originally sent this query to Holger Elfes, but I understand he has now left the company and you are responsible for European media enquiries. To flag, my deadline is 3pm UK time on Wednesday (10 November).

Please get in touch if there's anything you need to clarify, and thanks in advance for your help.

Best regards,

Crispin Dowler

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# UNEARTHED

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**From:** Crispin Dowler <[crispin.dowler@unearthednews.org](mailto:crispin.dowler@unearthednews.org)>  
**Sent:** 08 November 2021 12:50  
**To:** 'holger.elfes@bayer.com' <[holger.elfes@bayer.com](mailto:holger.elfes@bayer.com)>  
**Cc:** Crispin Dowler <[crispin.dowler@greenpeace.org](mailto:crispin.dowler@greenpeace.org)>  
**Subject:** Neonic exports investigation Opportunity to Comment

Dear Holger,

It's been a long time since we last spoke, and I hope you're well. As you may remember, I'm a reporter for Unearthed, an environmental journalism project funded by Greenpeace UK. I'm getting in touch because I am working on another pesticides story that will make mention of Bayer, and I wanted to give you the opportunity to comment.

I have been working for several months with a researcher from the Swiss NGO Public Eye on a story about the continued manufacture and export from the European Union of neonicotinoid insecticides that are banned from nearly all outdoor use within the EU itself. These include agricultural and other outdoor-use products containing any of the following three active ingredients: imidacloprid, clothianidin, or thiamethoxam.

As part of that work, we have obtained and analysed hundreds of "export notifications" through information requests to the European Chemicals Agency, and other regulatory authorities. Since 1 September 2020, companies have had to issue these notifications for any intended exports of these chemicals. In this way, we have obtained records of all intended exports of banned agricultural neonicotinoid products out of the EU in the period 1 September -31 December 2020. One of the aims of this research is to identify Europe's main exporters of these banned agricultural neonicotinoid pesticides.

For our investigation, we are only interested in those products exported for plant protection purposes or for other outdoor uses.

Our research has uncovered that Bayer was one of the companies that exported banned neonicotinoid products for agricultural use during that period.

A summary of the data contained in the relevant export notifications is included in the attached spreadsheet, which you may check for any inaccuracies.

In summary, we intend to report the following:

- During the final four months of 2020, Bayer notified exports of 137.5 tonnes of pesticide products containing 60 tonnes of the banned neonicotinoids clothianidin and imidacloprid.
- This made Bayer the second biggest exporter of banned neonicotinoid products out of the EU in this period.
- Because these notifications covered only a four-month period, it is likely that the full annual exports of these products out of the EU by Bayer are much greater.
- 57% of these exports (by weight of active ingredient) were intended for low- or middle-income countries.
- The use of these chemicals has been severely restricted in the EU since 2013, and nearly all outdoor uses have been banned since early 2018, because they were found to pose unacceptable risks to bees. The World Health Organisation and the Food and Agriculture Organisation of the United Nations has stated that there is a "rapidly growing body of evidence" that "existing levels of environmental contamination" by these neonicotinoids is causing "large-scale adverse effects on bees and other insects".

Before we publish our story we would like to give you the opportunity to comment. My specific questions are as follows:

We understand that there are times when the actual volume of a chemical exported under PIC regulations is less than, or greater than the volume estimated in the Export Notification; and even occasions where the export ultimately did not happen at all. We are therefore giving companies the opportunity to let us know the actual volumes of banned crop protection products they exported under the relevant export notifications in 2020. We ask, therefore, that you confirm the actual volumes of each product and its banned active ingredient(s) you exported to each country under the above-mentioned export notifications, if materially different from the figures given in the notifications. (If these figures are materially different from the estimated figures in your notifications, we will report that difference. If you do not provide figures for the actual volume of exports, we will be obliged to assume the estimated quantities given in your export notifications are the quantities that were actually exported.)

As mentioned above, for the purposes of this investigation we are only interested in exports of neonicotinoids for agricultural or other outdoor uses. We think we have successfully excluded from the data we obtained any exports of products intended for indoor use. However, if you believe any of the products exported under the export notifications in the attached spreadsheet are intended wholly and solely for indoor use (e.g. cockroach bait traps) please let us know and we will reflect that in our reporting. We are only able to do this in cases where you identify a specific export notification that is wholly for an indoor-use product. (In other words, we will not be able to treat as substantive the claim that some unspecified quantity of one or more of your notified exports may have been used for indoor purposes.)

Is it your view that the neonicotinoid pesticides you export from the EU can be used without posing risks to bees and other pollinators, in particular in low- and middle-income countries?

France has decided to ban the export of pesticides that are banned in the EU, and this prohibition will enter into force in 2022. Likewise, the European Commission has said it intends to end the practice of manufacturing chemicals for export that are banned from use within the EU. What is your view of these intended measures, and what impact do you expect them to have on your exports of neonicotinoid products from the EU?

Is there any other comment or clarification you would like to offer on the information summarised above?

Thanks in advance for your help in this matter. My deadline is Wednesday 10 November, 2021, 3pm UK time. I appreciate that this is a complex query, and would be very happy to talk it through if you'd like to clarify anything. I'm available on the mobile number below, or please let me know if there's a time when you would like me to call you.

I would also be very grateful if you could drop me an email to confirm that you've got this.

Best regards  
Crispin Dowler

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