



via: [REDACTED]@ec.europa.eu

Dear Executive Vice President Timmermans,

Thank you for your leadership on developing the New Green Deal for Europe. I have enjoyed recent virtual sessions with you under the auspices of the World Economic Forum and separately also through Imagine/Paul Polman. Bayer is committed to setting new standards of sustainability for the agricultural and healthcare industries and shares the European Commission's objectives towards carbon neutrality, more sustainable and resilient food systems, and the urgent need to slow and, soon, reverse biodiversity losses globally. Taking on our share of the responsibility, Bayer has committed to reduce Greenhouse Gas emissions in agriculture by 30%, is working toward reducing the environmental impact of Crop Protection by 30% and has plans in place to support 100 million smallholder farmers in low- and middle-income economies globally. Our target is to deliver these goals by 2030. So you can count on Bayer as a strong supporter of the New Green Deal.

However, we also firmly believe that the New Green Deal will only succeed if adequate attention is given to the need for more innovation to ensure a higher level of sustainability. Recently, some Members of the European Parliament (MEP) wrote to you and asked that you do not approve the import authorization for herbicide tolerant soybean (MON 87708 x MON89788 x A5547-127). As this is a Bayer product, I would like to take this opportunity to provide some information on the matter.

As you most likely know, MON 87708 x MON 89788 x A5547-127 soybean was submitted for authorization on October 28, 2016 and received a positive EFSA opinion on May 22, 2019 which was then published on July 5, 2019. Having followed the comitology procedure through to the PAFF Committee on Dec 9, 2019 and Appeal Committee on Jan 23, 2020, MON 87708 x MON 89788 x A5547-127 soybean has now been at the final stage

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of adoption with the College of Commissioners for longer than the period deemed good administration by the European Ombudsman<sup>1</sup>.

Bayer appreciates there is some debate around biotech import approvals in the European Union and that MEPs have raised specific points about MON 87708 x MON89788 x A5547-127. In this context, it is important to emphasize that Europe's Food safety authority (EFSA) has reviewed and cleared the safety of the product. Regarding the specific claims raised by MEPs, the extensive body of science behind the safety of our herbicides confirms that they are safe when used according to labeling instructions. Moreover, a reproductive toxicity hazard classification for glufosinate (which is not a product from Bayer) does not necessarily indicate risks under normal use conditions. In considering the claim that cumulative effects of residues on soybeans have not been analyzed, it is important to note that the dossier awaiting the Commission approval pertains to the safety of the crop itself, and EFSA has a separate and robust safety assessment for herbicide residues in the context of those herbicides being reviewed for registration, renewal, or the establishment of import tolerances and maximum residue levels.

Specific to MON 87708 x MON 89788 x A5547-127 and the points raised by MEPs, this soybean has been evaluated with the EU GMO process concluding the herbicide tolerant soybeans are as safe as conventional counterparts. The same is true for the residues of the pesticides used on them which have successfully gone through the EU regulatory processes for pesticides' Maximum Residue Levels and Import Tolerances that ensure food safety for European consumers. In the context of this soy product and its relationship to the topic of deforestation, Bayer is striving for net zero deforestation, and this can only be achieved with higher yielding soybeans that require less land. . New seeds and new breeding advancements are a critical part of the solution to stop deforestation, not the root cause of deforestation. Advancing a Commission decision on MON 87708 x MON 89788 x A5547-127 soybean and advancing Commission processes such as resuming Standing Committee meetings are critical steps you can promote, and which can advance important agricultural innovations which are key to addressing environmental and food sustainability goals.

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<sup>1</sup> *Decision of the European Ombudsman closing the inquiry into complaint 1582/2014/PHP on the European Commission's handling of authorisation applications for genetically modified food and feed. (Strasbourg, 15/01/2016)*



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The ongoing experience of the COVID-19 pandemic has underscored the criticality of food security, effective supply chains and the need for increased food resiliency to enable predictable supply of goods to consumers in Europe and across the world. The last few months have emphasized the vulnerabilities and strengths of our agricultural systems and surfaced opportunities for improvements. At the core of those solutions, is the need for continued innovations - whether they come in the form of advancements in seeds and crop protection tools or in accelerated digital agriculture solutions - and the need for more progress in regulatory processes to ensure these innovations can reach the market in a timely manner. Bayer is committed to investing €25 billion in research and development in the next 10 years to advance agriculture and is committed to partnering with authorities to ensure that these innovations are delivered to as many farmers as possible in order to drive sustainability and ensure food security.

We need to open a broader public debate on role of innovation in agriculture and, in this context welcome the dialogue around the New Green Deal. The challenges humanity and the planet are facing are simply too serious to continue engaging in ideological debates that do not offer solutions that serve both the people and the planet. We need a fresh start and a new joint vision for agriculture that, among others, acknowledges the role of innovation and is open to advancements in innovation and technology. Bayer would like to actively contribute to such a debate and be a partner in providing solutions. I am personally very passionate about this matter and am at your disposal at any time to discuss specific ideas and opportunities to collaborate further.

In the meantime, on the matter of MON 87708 x MON 89788 x A5547-127 soybean, we hope you agree there are very compelling reasons to advance this approval given the confirmed safety profile and the need for more productive soybean seed systems that require less land, less pesticides and can help ensure food security without starving the planet.

In case you require any additional information on this issue, please don't hesitate to reach out, my team and I are always at your disposal for further discussion.

With kind regards,

