November 2020

Dear Sandra Rasmussen,

Thank you for the opportunity to provide comments on your story. Please see our responses below, which include important clarifications.

1. **You asked about the export of Marshal insecticide. Your question suggested that Marshal insecticide contains carbofuran. You also asked about the export of malathion.**

   Marshal is a formulated insecticide used by farmers to control aphids, thrips, borers and other destructive pests in rice and other crops. Marshal insecticide products do not contain the active ingredient carbofuran. Marshal insecticide contains the active ingredient carbosulfan, which is different and distinct from carbofuran. FMC/Cheminova does not manufacture, nor has it ever manufactured, carbosulfan products (such as Marshal insecticide) in Denmark. Furthermore, FMC/Cheminova does not, and has never, manufactured carbofuran in Denmark.

   Regarding your comment about ECHA's register indicating export of Marshal to South Africa, Marshal insecticide products are formulated in the U.S. and sold to customers in countries where it is registered and approved for use by farmers. As a global company, we manufacture products at facilities around the world, and sell those products in many different countries where they are registered and approved for sale. In the example you cited about Marshal insecticide exported to South Africa, that product was formulated in the U.S. and shipped directly to South Africa. Those sales are recognized through our Europe, Middle East, and Africa business region located in Denmark, which managed the transaction with the customer.

   Regarding your question about malathion, FMC produces this active ingredient in Denmark and sells it in countries where it is registered and approved for use. Although it is registered for use in the European Union, we do not sell it in the EU. Malathion is one of the most effective tools to combat pests that can destroy thousands of acres of crops in days. For example, locust swarms are devastating farms and causing extensive crop damage in East Africa, as reported by the United Nations' Food and Agriculture Organization (FAO) and other leading authorities. Products such as malathion are critical in fighting the invasion of these pests, which threaten food supplies, farmers' livelihoods and local economies. African governments and international agencies have appealed to crop protection companies, including FMC, for products such as malathion to help them fight the locust infestation. Malathion is also one of the few products approved for use in vector control programs to control mosquitoes that carry diseases including malaria, dengue and others.

2. **You asked a series of questions about the export of crop protection products from the EU to other countries, including the export of products that are not registered for sale in the EU.**

   A product that is not registered for sale in one or more countries does not mean the product is not permissible and effective to use in other countries on crops as directed on its label. There are many reasons a product is offered in one country but not in another. These could include:

   In some cases, farmers in other parts of the world grow different crops that require protection technologies that might only be available from older products. There are also different pests in different parts of the world that require different crop protection technologies.

   Certain products serve as highly effective and affordable tools for farmers to control pests that can decimate a farm in days. In some emerging economies, certain products may be the only viable tool to address these pests, which in some cases could be much more severe and destructive in one country versus another country. FMC crop protection products are considered safe when used in accordance to label instructions.

   Some countries enact different regulatory standards on certain products, possibly because of changing local regulations or due to the availability of new or different crop protection technologies that can perform equally or better than the older products. While these changes may lead to withdrawal of certain products in that country, those same products often remain an important—and sometimes the only—viable tool for farmers in other parts of the world.

3. **You did not specifically ask about highly hazardous pesticides (HHP), but you had indicated your story is based on a recent *Unearthed* article about HHPs. We wanted to provide a comment on this.**

   FMC is continuing to phase out Highly Hazardous Pesticides (HHPs) from our product portfolio. We define and evaluate HHPs using the criteria and process defined by the UN Food and Agriculture Organization (FAO), which is the globally accepted regulatory classification scheme.

   At the end of 2019 we ceased sales of carbofuran (which is classified as an HHP) in the few remaining countries where it was sold. We currently have five HHPs left in our portfolio, which account for less than 0.5% of FMC's projected 2020 global sales. We continue to identify HHPs to be phased out over the next one to two years. Risk assessments and product stewardship programs for these products in the specific countries of sales continue so that we are aware of, and can immediately address, any issues that may occur.

   Our Product Stewardship and Sustainability Assessment tool screen out potential HHPs early in the development process of new products. Our commitment is steadfast to not develop or sell any new HHPs.

   Lastly for clarification, we want to note that carbosulfan and malathion, according to the official FAO Criteria, are not classified as HHPs.

4. **Finally, some of your questions commented on pesticides and their benefits to agriculture in developing countries.**

   Reports and statistics from leading global authorities overwhelmingly point to the monumental challenge of feeding a growing world population. Farmers are called on to meet this challenge by growing more nutritious food on the same or less arable land. Their crops must compete with 10,000 species of plant-eating insects, 30,000 species of weeds that can dramatically reduce crop yield, and crop diseases that can devastate a farm.

   A significant percentage—some report as high as 40%—of the world's potential crop production is lost annually due to insects, crop diseases and weeds. Without crop protection technologies, these losses would be significantly higher.

   We take our long-standing commitment and responsibility seriously to support users of our products through stewardship programs around the world, ensuring FMC products are properly and safely applied as directed by the label. Furthermore, FMC supports the *International Code of Conduct on Pesticide Management*, a framework through a joint collaboration with the UN Food and Agriculture Organization (FAO) and the World Health Organization (WHO) that outlines shared responsibility of many sectors of society to ensure the necessary and acceptable use of pesticides without significant adverse effects on human health, animal health or the environment.

   Lastly, it is important to remember that pesticides are among the most tested and regulated products in the world—often exceeding testing for pharmaceuticals. Typically, pesticides require over a decade of research and development and well over $250 million to bring one new product to market to ensure their safety for people, the environment and wildlife.