

**February 2020**

**Bayer comment on the article**

**“Pesticides en Tunisie, le cadeau empoisonné”**



Bayer gladly seizes the opportunity of the Business Human Rights & Resource Center to respond to the article “Pesticides en Tunisie, le cadeau empoisonné” alleging that Bayer’s sales activities of Pesticide in Tunisia are currently causing environmental damages in the country.

Bayer is committed to stringent standards and the responsible use of its crop protection products. The company is committed to Product Stewardship as an integral part of its activities, ensuring that its products, services and technologies are safe and sustainable, and their use is environmentally responsible.

Bayer endorses the Food and Agriculture Organization (FAO) of the United Nations Code of Conduct on Pesticide Management, the CropLife International Plant Biotechnology Code of Conduct, and the Universal Declaration of Human Rights. These guidance documents provide the basis for Bayer Product Stewardship commitment.

CropLife International is a crop protection industry association and provides information on the safe use of pesticides along the whole product life cycle ([Product Stewardship](#)). Among others, this association provides trainings on the safe use of pesticides, provides guidance on empty container management or facilitates obsolete stock management. CropLife Africa Middle East has an office in Tunis.

The article indicates illiteracy of rural farmers as a contributing factor. In order to support them understanding how to use products safely, Bayer invests in target group-oriented support, e.g. by making understanding of labels easier through pictures and pictograms.

The article also lists the circumstance that products can be exported to countries outside of the country of origin, even though the commercialization in the country of origin is not/no longer allowed. That’s a given fact which the Rotterdam Convention is encountering. This Convention supports the importing countries to receive prior information on the pesticides being exported.

However, Bayer sells only products which have a registration in the corresponding country. Outside Europe, products can be marketed for certain crops and pest or diseases which don’t occur in Europe. In addition, Bayer voluntarily only sells products in countries in which the active substance of a product is registered in at least one OECD country or for new active substances, where an OECD data package is available.

Since 2012, Bayer has stopped selling all products that were considered acute toxicity class 1 by the World Health Organization, regardless of whether they were allowed in a particular market. As part of Bayer’s “Raising the Bar” initiative, communicated in 2019, Bayer announced that it will only sell crop protection products in developing countries that meet both the safety standards of that local market and the safety standards of a majority of countries with well-developed programs to regulate crop protection products.

Therefore, the company will apply consistent safety standards to its products, even when it means exceeding local regulations.

The legalization for the use of pesticides differs among the Arabic countries. From these countries, Egypt is considered as leading country for most of the Arabic countries. Based on that, Egypt is followed by most of the Arabic countries in Middle East and North Africa, thus also Tunisia, regarding pesticides legalization. Egypt has developed a full [Pest Control Strategy \(APC/4/2006\)](#), which covers the use of pesticides.

Finally, Bayer likes to inform that *Naceur Chouikh*, mentioned as Bayer’s representative in Tunisia in the article, has already retired from Bayer in January 2017. Therefore, there is no conflict of interest for Bayer.

Thank you for the opportunity to respond.