

25 April 2025

To: Shareholders of Bayer

Dear Sir or Madam:

In anticipation of Bayer's AGM, we, civil society organisations from both sides of the Atlantic ocean and beyond, are writing to you regarding the company's ongoing lobbying activities, in particular those deployed in the US at the expense of US citizens' rights. In our view, these activities do not live up to Bayer's own Code of Conduct¹, nor to general principles of corporate responsibility, such as the International Code of Conduct on Pesticide Management² and the basic principles of the UN Global Compact³.

In 2024, Bayer CEO Bill Anderson stated that in "building a company, (...) a shared sense of integrity and a strong ethical code are absolutely essential" and called upon "everyone in Team Bayer (...) to ensure we're acting with integrity". Mr Anderson also stated that "political advocacy, or lobbying, means participating in democratic processes and formation of public policy by communicating a person's or organisation's interests to politicians and institutions that create policies and regulatory frameworks affecting their areas of activity or business."

However, for at least the past two years and till today, the Europe-based multinational Bayer is waging an intensive lobbying campaign in the US which goes far beyond merely "communicating a person's or organisation's interests to politicians and institutions that create policies and regulatory frameworks". Over the past decade, 181,000 US plaintiffs have filed lawsuits against the company, arguing they were not informed of the dangers of using glyphosate-based Roundup herbicide. Many have won multi-million-dollar and even multi-billion-dollar jury verdicts, and tens of thousands have received settlements from Bayer. But many more trials continue.

Bayer is now responding by lobbying federal and state authorities to block citizens from taking producers to court when they suffer damage to their health after using their toxic products. As reported in the Washington Post, a draft of the US Farm Bill contained a section, "drafted with the aid of Bayer", that would prevent state and local authorities from setting their own standards on pesticide safety warnings.⁴ This cannot be regarded as "ethical and responsible" behaviour. Laws to this end have been introduced in at least eight

¹As international research shows, the largest agrichemical companies in the world (BASF, Bayer Crop Science, Corteva Agriscience, FMC and Syngenta/Synchem) make more than one-third of their sales income from highly hazardous pesticides — the pesticides that are most harmful to human health and the environment. See: <https://www.publiceye.ch/en/media-corner/press-releases/detail/pesticide-giants-make-billions-from-bee-harming-and-carcinogenic-chemicals>

²The last version of the International Code of Conduct with emphasis on public health, "focuses on risk reduction by calling on countries to identify and, if necessary, remove from use, of highly hazardous pesticides" and calls on industry and governments to "take all necessary precautions to protect workers, bystanders, nearby communities and the environment;" See: <https://openknowledge.fao.org/server/api/core/bitstreams/a9191456-07cb-4a79-9dce-50472e31b694/content>

³See UN Global Compact principles 7 and 9: <https://unglobalcompact.org/what-is-gc/mission/principles/principle-7>
<https://unglobalcompact.org/what-is-gc/mission/principles/principle-9>

⁴Washington Post, 20 June 2024. Bayer lobbies Congress to help fight lawsuits tying Roundup to cancer. <https://www.washingtonpost.com/business/2024/06/20/bayer-roundup-farm-bill-lobbying/>

US states⁵ and are being prepared in more than twenty states. According to Bayer's own figures, in 2023 the company spent 18 million USD on lobbying in the US.

Court documents show that Bayer and Monsanto have long and aggressively fought the science⁶ on glyphosate and glyphosate-based herbicides such as Roundup. In an open letter of April last year, Bayer called scientific studies brought forward in the litigations against Roundup "junk science". This includes studies by scientists working independently of pesticide companies, which were reviewed by the International Agency for Research on Cancer (IARC) and led it to classify glyphosate as a probable human carcinogen.

As recently as December 2023, a [US National Institutes of Health study](#) reported fresh evidence that glyphosate exposure is associated with oxidative stress in humans, which is known to lead to many diseases, including cancer⁷. In response, an American coalition of farm workers, public health and environmental advocates filed a legal petition with the US Environmental Protection Agency (EPA) demanding they immediately suspend authorization for glyphosate.

In fact, in 2023 Bayer promised to remove glyphosate from Roundup products sold to US consumers – only to make things worse by adding four chemicals, two of them banned in the EU, including diquat dibromide. As reported by Friends of the Earth US, this makes the new Roundup on average 45 times more toxic to human health following long-term, chronic exposures.

Around the world, with its deep pockets, Bayer tries to undermine laws and regulations that should protect the population and the environment and hence serve the general interest, deploying a wide range of lobbying tactics⁸. In Europe, for example, Bayer – along with its lobby group Croplife EU – fought hard to take down the pesticide reduction law, a crucial part of the EU Green Deal.

This is in stark contrast also with what European lawmakers outlined in their Report on the Monsanto Papers. The authors – Members of the European Parliament – stated that we need stronger risk management measures: "The authorisation procedure for plant protection products should remain science-based and rely on independent, transparent and efficient processes" and "studies used for the assessment should be more independent and based on scientific evidence, to avoid conflicts of interests".

Bayer's lobby campaign in the US has now ignited battles in several US farming states between farm groups. In the New Lede and The Guardian, Aaron Lehman, an Iowa corn and soybean farmer, president of the Iowa Farmers Union, said: "We're very worried. Our farmers feel that if they have injuries or illnesses due to their use of a pesticide they should have access to the courts. We just don't think the playing field should be tilted."

⁵The Guardian, 10 February 2025. Farmers 'very worried' as US pesticide firms push to bar cancer diagnoses lawsuits.
<https://www.theguardian.com/environment/2025/feb/10/pesticide-lawsuits-cancer-gag-act>

⁶These include manipulating science, including ghostwriting, funding disinformation campaigns, influencing regulators, and organising a smear campaign against IARC. See: <https://stopglyphosate.eu/policy-and-scientific-integrity/>
<https://www.wisnerbaum.com/documents/monsanto-documents-chart-101217.pdf>

⁷Glyphosate Use and Mosaic Loss of Chromosome Y among Male Farmers in the Agricultural Health Study:
<https://ehp.niehs.nih.gov/doi/10.1289/EHP12834> and: <https://pubmed.ncbi.nlm.nih.gov/36629488/>

⁸Bayer and Monsanto have been using trade policy to push third countries into changing their laws, while delaying and distracting policy makers with investment promises. These tactics have been deployed across the world: in the EU and the US, but also in Thailand, Mexico, and in African countries. See: <https://www.corporateeurope.org/en/2024/09/bayers-toxic-trails>

Bayer claims that the legislative changes are simply necessary to protect its “important investments” and to ensure farmers don’t lose access to Roundup. This is in stark contradiction of its self-declared value of “integrity” and internationally accepted standards.

The aim of Bayer’s lobby campaign is simple: to maximise profits and maintain an almost monopolistic control over the commercial seed and pesticides markets.⁹ As the US academic Phil Howard wrote, Bayer’s commercial strategies are hurting farmers in the US as well: “Agrifood consolidation reduces farmer autonomy and redistributes costs and benefits across the food chain, squeezing farmer incomes”.

Simply put: Bayer’s miscalculation of its 53 billion euro purchase of Monsanto in 2018 is coming at the expense of consumers, farmers and democracy, with commercial interests blatantly overruling public health and environmental concerns.

In view of the above, we, the undersigned organisations from the US, Europe, and beyond, urge you to make the following demands to Bayer:

- Cease promoting the pesticide makers’ legal immunity bills in the US
- Refrain from any further lobbying efforts that are damaging to the public interest
- Stop undermining scientific integrity by attacking independent science and instead, respect the Precautionary Principle.

Signed by:

Europe

Association of Ethical Shareholders Germany (Germany)
Coordination gegen BAYER-Gefahren
Corporate Europe Observatory
European Coordination Via Campesina (Europe)
Pesticide Action Network Europe
Pesticide Action Network Netherlands
Pestizid Aktions-Netzwerk e.V. (PAN Germany), Germany
foodwatch international
Foodwatch Netherlands
GMWatch
Isde, International Society of Doctors for Environment Italy
Ecologistas en Acción, Spain
Gallifrey Foundation (Switzerland)
Générations Futures (France)
Gen-ethisches Netzwerk e.V. (Germany)
Nature & Progrès (Belgium)
European Network for Environmental Medicine
Via Pontica Foundation
Ecology without borders foundation
Demeter Foundation The Netherlands

⁹Just four multinationals – Bayer, BASF, Corteva and Syngenta – control over 65% of global trade in pesticides and at least half of the world’s seed trade, representing a multi-billion euro market. See: <https://philhoward.net/2020/11/19/concentration-and-its-impacts/>

Mouvement Ecologique (Luxembourg)
CCFD-Terre Solidaire (France)
Earth Thrive - UK/Balkans
Eco Hvar (Croatia)
GLOBAL 2000 - Friends of the Earth Austria
Neo-Agri, France
Neo-Agri España
Earth trek (Croatia)
TROCA - Plataforma por um Comércio Internacional Justo (Portugal)
ZERO - Associação Sistema Terrestre Sustentável (Portugal)
Pesticide Action Network UK
Friends of the Earth England, Wales and Northern Ireland
Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) e.V., Germany
Interessengemeinschaft gegen Nachbaugebühren (IG-NAchbau), Germany
Friends of the Earth Europe
Bündnis für eine enkeltaugliche Landwirtschaft (BEL) e.V. (Germany)
The Organic Centre (Ireland)
Friends of the Irish Environment
Ecocity (Greece)
PublicEye
Scientists for Global Responsibility (UK)
UK Hazards Campaign / Greater Manchester Hazards Centre
Comité de recherche et d'information indépendantes sur le génie génétique (CRIIGEN)
Ecobaby Foundation, the Netherlands
FDCL-Center for Research and Documentation Chile-Latin America
Forum für Internationale Agrarpolitik e.v., Agrar Koordination
Adéquations (France)
People's Coalition on Food Sovereignty Europe
International Baby Food Action Network
Baby Milk Action
Centre Centreer for Sustainable Rural Development Kranj (WG Organic Farming in Plan B for Slovenia Network)
POLLINIS (France)

US/North America

Center for Environmental Health
Environmental Working Group
Community Alliance for Global Justice/AGRA Watch
Family Farm Defenders
Farm and Ranch Freedom Alliance
Moms Across America
Idaho Conservation League
Iowa Citizens for Community Improvement
Institute for Agriculture and Trade Policy (IATP), USA
Organic Consumers Association
GMO/Toxin Free USA
GMOScience (USA)
Vigilance OGM (Québec, Canada)
Green America
Center for Food Safety

Rural Education Action Project (DBA Rural Vermont)
Northeast Organic Farming Association-Interstate Council
Northeast Organic Farming Association of New Hampshire
Beyond Pesticides
Rachel Carson Council
Jefferson County Farmers & Neighbors, Inc. (JFAN)
Iowa Alliance for Responsible Agriculture (IARA)
Poweshiek Community Action to Restore Environmental Stewardship (CARES)
Pesticide Action & Agroecology Network North America (PANNA)
Climate Land Leaders
Moniteau County Neighbors Alliance
Toxic Free North Carolina
Alianza Nacional de Campesinas Inc.
Moms for a Nontoxic New York (MNNY)

Other/International

Pesticide Action Network (PAN) International
Alliance for Action on Pesticides in Nigeria (AAPN)
Pesticide Action Network (PAN) Africa, Senegal
Red de Acción en Plaguicidas y sus Alternativas de América Latina, RAP-AL
Red de Acción sobre Plaguicidas y Alternativas en México (RAPAM)
Somali Greenpeace Association, SOGPA,
Somalia, AFRICA
Biofuelwatch (Europe/USA)
Ekō
UnPoison (South Africa)
ISDE Bangladesh
Navdanya International
Centro de estudios Heñói, Paraguay
Child Rights International Network (CRIN)
Alianza por una Mejor Calidad de Vida de Chile,
AGENDA for Environment and Responsible Development (Tanzania)
Haki Nawiri Afrika (Kenya)
RAPAL- Uruguay
Health and Environment Justice Support
IFOAM Seeds Platform
Rural Women's Association for Agroecology (RWAA)
Rural Women's Assembly (Southern Africa)
Consumers' Association of Penang, Malaysia
Sahabat Alam Malaysia (Friends of the Earth)
Groundswell International
Aalem for Orphan and Vulnerable Children, (AOVC), Liberia
ICW-CIF
PELUM Zambia
Women on Farms Project, South Africa
Greener world Alliance Zambia
Earth Thrive - UK/Balkans
The Caribbean Poison Information Network
Association APEDDUB, Tunisia
Association pour la Conservation et la Protection des Écosystèmes des Lacs et
l'Agriculture Durable - ACOPELAD (RDCongo)

Indonesia for Global Justice (IGJ), Indonesia
Association For Promotion Sustainable Development
La Grande Puissance de Dieu (Benin)
Fundacion Aguaclara (Venezuela)
DADO-Pakistan Human Development and Child Right Organization
Khanyisa Education and Development Trust, South Africa
CASA CEM- Vias Verdes A.C. México
Women on Farms Project South Africa
GeneEthics, Australia
Hamraah Foundation, New Delhi, India
Community Action Against Plastic Waste (CAPws)
Bangsa Moro autonomous region in Muslim Mindanao (BARMM) Philippines
Muchi children's Home (Zambia)
Children's Environmental Health Foundation , Zambia
Des Moines County Farmers and Neighbors for Optimal Health
Association for Solidarity through Humanitarian Imperative Action (ASHIA) International,
Cameroon