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(Sent via Electronic Mail: thayer@niehs.nih.gov)

Dr. Kristina Thayer
Director
Office of Health Assessment and Translation (OHAT)

RE: Syngenta Crop Protection, LLC Response to National Institutes of Health; Nominations to the Report on Carcinogens and Office of Health Assessment and Translation; Request for Information (Federal Register/Vol 80, No. 194/Wednesday, Oct 7, 2015/Notices)

Dear Dr. Thayer:

Syngenta is a research and development based company that is a world leader in providing crop protection solutions to agricultural producers of food, fuel, and fiber. We appreciate the opportunity to provide information and comments relative to the proposed substances being considered by OHAT for evaluation of non-cancer health outcomes. Syngenta is the primary thiamethoxam registrant at the Environmental Protection Agency (EPA), one of the neonicotinoid insecticides being considered for evaluation by OHAT.

Syngenta recognizes the importance of evaluating our products for safety and stewardship purposes. EPA is required, by statute, to re-evaluate this product (and all products) every 15 years. Thiamethoxam was originally registered by US EPA in 2000 with a robust database. Since that time, additional research was conducted and studies were submitted further demonstrating the safety of this product. Thiamethoxam is currently undergoing registration review at EPA and information is available under the "Schedule for Review of Neonicotinoid Insecticides" (<http://www2.epa.gov/pollinator-protection/schedule-review-neonicotinoid-pesticides>). As presented by EPA at the NAFTA Technical Working Group meeting held on November 4, 2015, the Agency has plans to issue a preliminary risk assessment in December 2016 and plans on completing the review in December 2017.

EPA assesses publicly available information associated with thiamethoxam, in addition to all of the required research guideline studies conducted under GLP and submitted by Syngenta to EPA in support of the continued safe use of thiamethoxam. They have a mechanism in place to evaluate all of these studies and the authority to require additional studies if it is determined further information is needed. Syngenta requests that OHAT remove the neonicotinoids from their proposed nomination since EPA is currently conducting a comprehensive assessment of thiamethoxam and other neonicotinoids that is inclusive of the non-cancer health assessment proposed by OHAT.

Thank you for the opportunity to provide comments relative to this process. Please contact me if you need further information.

Respectfully submitted,
[Redacted]

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