

Bayer's response on ChemSec's assessment 2026

In August 2026, Bayer responded to ChemSec's ChemScore draft assessment as follows:

General remarks sent to ChemSec

The Bayer team appreciates your interest in our company. Before digging into the details of your questionnaire, we would like to point out a few overarching remarks and suggestions concerning the underlying methodology of ChemSec's ChemScore considering our business activities:

Bayer is active in highly regulated markets in crop protection and in pharmaceuticals. Numerous studies need to be performed as basis for comprehensive scientific dossiers before a pesticide or a pharmaceutical substance can be approved (e.g., on EU-level) or a product can be registered on country-level and marketed – **this is different from other chemicals in scope of ChemSec and should be accurately reflected in the respective assessments.**

Each R&D project in crop protection must undergo comprehensive assessments of potential impacts on the health of humans and animals as well as impacts on the environment as defined by respective regulatory frameworks. To ensure the safe use of our crop protection products based on adequate research, we market only those crop protection products whose active ingredients are registered in at least one OECD country or, in the case of new active ingredients, for which an OECD data package has been compiled. The internationally agreed OECD methodology considers both the intrinsic hazard properties of a substance and its exposure into the environment. **Contradictory, ChemScore's methodology seems to exclusively focus on the hazard profile of the substances.**

The EU has the most complex and ambitious chemicals legislation in the world: REACH. Together with the CLP (Classification, Labelling and Packaging) for hazard assessment and communication, it constitutes a solid umbrella framework to regulate substances and mixtures. As a result of REACH, Europe has the most comprehensive knowledge database on chemical hazards and risks globally. This framework is complemented by a complex array of other use and product-specific policies.

We would also like to highlight that for the purposes of REACH and chemicals regulations in general, persistence thresholds have been chosen not on the basis of persistence alone, but on a combination of persistence and other substance properties. This means that a substance deemed to be persistent is only considered to be hazardous if it is at the same time persistent, bioaccumulative and toxic (PBT substance), or at the same time persistent, mobile and toxic (PMT substance). Therefore, fulfilling the persistence criterion on its own does not constitute a hazard to human health or environment. This is not reflected in ChemScore's methodology.

We clearly have to distinguish between regulatory assessments following international standards and individual opinion. **ChemScore's assessment of the product portfolio mixes regulatory assessments and individual assessments.**

For FY 2025 Bayer's revenue generated in the US and EU countries was approx. 54%.

Additional comments on ChemSec assessment criteria Category 2. Phase-out persistent chemicals

Persistence is a property indicating presence of a substance in the environment for a prolonged period. In legal terms, persistence is typically defined by a half-life of a substance, i.e., the time required for a quantity of substance to reduce to half of its initial value. For example, Annex XIII of REACH Regulation setting out the criteria for Article 57d notes that a substance fulfils the persistence criterion when the degradation half-life in fresh water is higher than 40 days, or when the degradation half-life in soil is higher than 120 days.

For the purposes of REACH and chemicals regulations in general, persistence thresholds have been chosen not on the basis of persistence alone, but a combination of persistence and other substance properties, such as bioaccumulation (build-up of a substance over time in a living organism), mobility (ability of a substance to move through the environment), or toxicity (the degree to which a substance can cause harm to humans or animals). This means that a substance deemed to be persistent is only considered to be hazardous if it is at the same time persistent, bioaccumulative and toxic (PBT substance), or at the same time persistent, mobile and toxic (PMT substance). Therefore, fulfilling the persistence criterion on its own does not constitute a hazard to human health or environment.

It is also worth noting that in some cases persistence may be necessary for a particular substance to perform its function. For example, persistence of pharmaceuticals in the environment may be linked to how a medicine should be metabolised in the human body in order to be effective. In cases where a pharmaceutical product is deemed to be persistent in the environment, an assessment to conclude on its PBT/PMT properties will be conducted during a market authorisation process in line with the criteria identical to those defined under REACH regulation.

We remain committed to minimising any environmental impact across our portfolio, including use and production of potential PBT and PMT substances.

Additional comments on ChemSec assessment criteria Category 3: Reduce hazardous product portfolio**Substances used exclusively as intermediates:**

ChemSec's current SIN Producers List includes 13 substances on Bayer that are used exclusively as intermediates in production in all our facilities, including all subsidiaries. These substances are converted through further chemical reactions and handling takes place in enclosed industrial facilities, which means that no contact with any substance of concern occurs.

This applies to the following substances:

CAS #	Substance name
288-88-0	1,2,4-triazole
32539-16-5	1,3,4-Thiadiazole, 2-(methylthio)-5-(trifluoromethyl)-
1121649-70-4	1,3-Cyclohexanedione, 2-[2-chloro-4-(methylsulfonyl)-3-[(2,2,2-trifluoroethoxy)methyl]benzoyl]-, ion(1-), potassium (1:1)
69045-84-7	2,3-dichloro-5-trifluoromethylpyridine
360-64-5	Benzamide, 2-(trifluoromethyl)-
142994-05-6	Benzoic acid, 2-(methylthio)-4-(trifluoromethyl)-
120100-77-8	Benzoic acid, 2-chloro-4-(methylsulfonyl)-3-[(2,2,2-trifluoroethoxy)methyl]-
143701-81-9	Benzoyl chloride, 2-(methylsulfonyl)-4-(trifluoromethyl)-
1118729-23-9	Benzoyl chloride, 2-chloro-4-(methylsulfonyl)-3-[(2,2,2-trifluoroethoxy)methyl]-
77-78-1	Dimethyl sulphate
936914-80-6	Methanone, (5-hydroxy-1,3-dimethyl-1H-pyrazol-4-yl)[2-(methylsulfonyl)-4-(trifluoromethyl)phenyl]-, potassium salt (1:1)
95-53-4	O-toluidine
1634-04-4	tert-butyl methyl ether; MTBE; 2-methoxy-2-methylpropane