



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
Washington, D.C. 20580

June 13, 2017

Stanley Bernard  
Drexel Chemical Company  
1700 Channel Avenue  
P.O. Box 13327  
Memphis, Tennessee 38113

Re: *In the Matter of China National Chemical Corporation, et al.*  
*FTC File No. 161 0093, Docket No. C-4610*

Dear Mr. Bernard:

Thank you for your comment regarding the proposed consent order involving China National Chemical Corporation (“ChemChina”) and Syngenta AG (“Syngenta”). The Commission has placed your comment on the public record, and given your comment careful consideration in connection with its decision whether to give final approval to the Decision and Order.

As we understand your comment, you are concerned that the remedy should be expanded to include metolachlor and that the combination “would yield a combined share in excess of eighty percent.”

The goal of the consent agreement is to help mitigate the anticompetitive effects that would result from ChemChina’s acquisition of Syngenta. The Commission decided to accept this consent agreement based on the fact it addressed all of the overlap products that raised antitrust concerns and provided for those products to be divested to AMVAC Chemical Corporation, which is well positioned to replace the competition that would be eliminated as a result of this transaction. The Commission believes the consent agreement presents the best opportunity to maintain competition in the markets for formulated products based on paraquat, abamectin, and chlorothalonil at pre-acquisition levels.

In light of this consideration, among others, the Commission has determined that the public interest would be best served by issuing the Decision and Order without modification. A copy of the final Decision and Order is enclosed for your information. Relevant materials are also available from the Commission’s website at <https://www.ftc.gov/enforcement/cases-proceedings/1610093/china-national-chemical-corporation-et-al>.

It helps the Commission's analysis to hear from a variety of sources regarding its work on antitrust and consumer protection issues, and we appreciate your interest in this matter.

By direction of the Commission.

Donald S. Clark  
Secretary of the Commission

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June 13, 2017

Chris Kircher  
State of Colorado

Re: *In the Matter of China National Chemical Corporation, et al.*  
*FTC File No. 161 0093, Docket No. C-4610*

Dear Mr. Kircher:

Thank you for your comment regarding the proposed consent order involving China National Chemical Corporation (“ChemChina”) and Syngenta AG (“Syngenta”). The Commission has placed your comment on the public record, and given your comment careful consideration in connection with its decision whether to give final approval to the Decision and Order.

As we understand your comment, you are concerned that this transaction is occurring around the same time that other agricultural chemical companies have announced plans to or are in the process of merging and that general industry consolidation may reduce the choices of farmers in the future. You also raised concerns about Syngenta being acquired by a State-owned Chinese company.

The goal of the consent agreement is to help mitigate the anticompetitive effects that would result from ChemChina’s acquisition of Syngenta. The Commission decided to accept this consent agreement based on the fact it addressed all of the overlap products that raised antitrust concerns and provided for those products to be divested to AMVAC Chemical Corporation, which is well positioned to replace the competition that would be eliminated as a result of this transaction. The Commission believes the consent agreement presents the best opportunity to maintain competition in the markets for formulated products based on paraquat, abamectin, and chlorothalonil at pre-acquisition levels.

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June 13, 2017

Roger Johnson  
National Farmers Union  
20 F Street, NW #300  
Washington, DC 20001

Re: *In the Matter of China National Chemical Corporation, et al.*  
*FTC File No. 161 0093, Docket No. C-4610*

Dear Mr. Johnson:

Thank you for your comment regarding the proposed consent order involving China National Chemical Corporation (“ChemChina”) and Syngenta AG (“Syngenta”). The Commission has placed your comment on the public record, and given your comment careful consideration in connection with its decision whether to give final approval to the Decision and Order.

As we understand your comment, you are concerned that this transaction is occurring around the same time that other agricultural chemical companies have announced plans to or are in the process of merging and that general industry consolidation may reduce the choices of farmers in the future. You also raised concerns about Syngenta being acquired by a State-owned Chinese company.

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June 13, 2017

John Hansen  
Nebraska Farmers Union  
1305 Plum Street  
Lincoln, Nebraska 68502

Re: *In the Matter of China National Chemical Corporation, et al.*  
*FTC File No. 161 0093, Docket No. C-4610*

Dear Mr. Hansen:

Thank you for your comment regarding the proposed consent order involving China National Chemical Corporation (“ChemChina”) and Syngenta AG (“Syngenta”). The Commission has placed your comment on the public record, and given your comment careful consideration in connection with its decision whether to give final approval to the Decision and Order.

As we understand your comment, you are concerned that this transaction is occurring around the same time that other agricultural chemical companies have announced plans to or are in the process of merging and that general industry consolidation may reduce the choices of farmers in the future. You also raised concerns about Syngenta being acquired by a State-owned Chinese company.

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June 13, 2017

Doug Sombke  
State of South Dakota

Re: *In the Matter of China National Chemical Corporation, et al.*  
*FTC File No. 161 0093, Docket No. C-4610*

Dear Mr. Sombke:

Thank you for your comment regarding the proposed consent order involving China National Chemical Corporation (“ChemChina”) and Syngenta AG (“Syngenta”). The Commission has placed your comment on the public record, and given your comment careful consideration in connection with its decision whether to give final approval to the Decision and Order.

As we understand your comment, you are concerned that this transaction is occurring around the same time that other agricultural chemical companies have announced plans to or are in the process of merging and that general industry consolidation may reduce the choices of farmers in the future. You also raised concerns about Syngenta being acquired by a State-owned Chinese company.

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June 13, 2017

Doug Sombke  
South Dakota Farmers Union  
1410 Dakota Avenue South  
Huron, South Dakota 57350

Re: *In the Matter of China National Chemical Corporation, et al.*  
*FTC File No. 161 0093, Docket No. C-4610*

Dear Mr. Sombke:

Thank you for your comment regarding the proposed consent order involving China National Chemical Corporation (“ChemChina”) and Syngenta AG (“Syngenta”). The Commission has placed your comment on the public record, and given your comment careful consideration in connection with its decision whether to give final approval to the Decision and Order.

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