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CONFIDENTIAL - ATTORNEYS' EYES ONLY
IN THE UNITED STATES FLORIDA CIRCUIT COURT
HILLSBOROUGH COUNTY

IN THE MATTER OF:
ALLEN WILLIFORD
LYNDA WILLIFORD

Plaintiff,

V.

CIVIL ACTION NO:
21-CA-006219

SYNGENTA CROP PROTECTION
LLC, CHEVRON U.S.A., INC.,
AND COUNCIL-OXFORD, INC.

Defendant.

DEPOSITION OF ANDY COOK
VOLUME I
Wednesday, October 19, 2022
AT:
Taken at: 9.30 a.m.
Kirkland & Ellis International LLC
30 St Mary Axe
London
EC3A 8AF
London
United Kingdom

Court Reporter:
Georgia Gould
Accredited Real-time Reporter

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1 have continued to defend the high strength Gramoxone Max
2 product that is still responsible for many deaths in the USA
3 and thousands more with standard Gramoxone in developing
4 countries."
5 That's what former employee of Syngenta
6 Jon Heylings reported to the company in 2019; right?
7 **A. It is.**
8 Q. Did Syngenta continue to contract with
9 Jon Heylings after he left the company in 2008?
10 **A. Yes, it did.**
11 Q. Okay. In what capacity?
12 **A. In addition to the role I've already mentioned**
13 **that Jon Heylings had, he was also engaged in dermal**
14 **absorption studies, and he set up a contract laboratory to**
15 **do dermal absorption studies following his departure from**
16 **Syngenta, and so the company contracted many dermal**
17 **absorption studies with his company.**
18 Q. Okay. And he actually is one of the leading
19 dermal absorption companies used by pesticide manufacturers
20 globally; right?
21 MR. NARESH: Objection to foundation.
22 **A. I don't know.**
23 BY MR. DICKENS:
24 Q. Okay. But after he left, Syngenta did contract
25 with him to run some dermal absorption studies?

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1 **A. Yes, we did.**
2 Q. And he in fact ran dermal absorption studies
3 specific to a comparison of Inteon and Gramoxone; right?
4 MR. NARESH: Objection, foundation.
5 **A. Not to my knowledge.**
6 BY MR. DICKENS:
7 Q. Do you know whether Jon Heylings has worked with
8 other pesticide manufacturers in running their dermal
9 absorption studies?
10 **A. It's my understanding that he has.**
11 Q. Okay. And do you know what companies?
12 **A. No, I don't.**
13 Q. Turn to page 2. It's another email that was
14 forwarded to you as part of this email chain, Jon Heylings
15 to Dave French, dated April 17th, 2019.
16 Who is Dave French?
17 **A. Dave French was the global head of product safety**
18 **and regulatory affairs.**
19 Q. Okay. And Jon Heylings forwarded some "Notes on
20 the Key Points relating to the Paraquat Emetic PP796 Issue";
21 do you see that?
22 **A. Yes, I do.**
23 Q. He says:
24 "It is pretty clear cut that the Rose report ..."
25 What's the Rose report?

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1 **A. The Rose report is a 1976 or '77 report in CTL**
2 **estimating how much of the emetic agent needed to be added**
3 **to paraquat-containing formulations in order to cause**
4 **vomiting.**
5 Q. Okay. It says:
6 "... pretty clear cut that the Rose report
7 CTL/R/390 contains a fabricated human dose response for the
8 paraquat emetic, PP796."
9 Do you see that?
10 **A. Yes, I do.**
11 Q. Okay. And then it says:
12 "The fabrication was detailed in my own signed
13 follow up letters to the CTL Executive in 1990 and [then] to
14 Bob Scott (CTL), Andy Cook ..."
15 That's you; right?
16 **A. Yes, it is.**
17 Q. Okay.
18 "... and Martin Wilks at Fernhurst in the following
19 years."
20 Now, the Martin Wilks, is that referring to
21 the Wilks who appeared on the published study related to
22 the safety of Inteon?
23 **A. Yes, it is.**
24 Q. Okay. And did you in fact receive a follow-up
25 letter from Jon Heylings related to the Rose report?

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1 MR. NARESH: Objection to the form.
2 **A. The -- there are several different time periods**
3 **being referred to here, so nothing -- I wasn't involved in**
4 **paraquat in 1990, but in 1994 or 1995 Jon Heylings indicated**
5 **that he disagreed with the Mike Rose report.**
6 BY MR. DICKENS:
7 Q. Okay, and upon receiving that information did you
8 do anything with it?
9 **A. Yes, Martin Wilks and myself had a telephone**
10 **conversation with Jon Heylings, and the matter was also**
11 **discussed with our respective heads of department,**
12 **Geoff Willis and Bernhard Johnen, and it was clearly**
13 **concluded from the human data that the emetic was delivering**
14 **the targeted response.**
15 Q. Okay.
16 You'd agree that falsified data should not be used
17 on matters of human safety?
18 **A. I would certainly agree with that statement.**
19 Q. Okay, you can put that aside.
20 (Exhibit 12 marked for identification)
21 BY MR. DICKENS:
22 Q. Go ahead and mark.
23 MR. NARESH: What number is this?
24 THE VIDEOGRAPHER: 12.
25 MR. DICKENS: Thank you, exhibit 12.

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1 **A. I haven't read the entire document but I believe**
2 **that's the context.**

3 Q. Okay.

4 MR. NARESH: Mr. Cook, if you need a moment to
5 review or refresh yourself on it, you're certainly entitled
6 to do so.

7 **A. Thank you.**

8 BY MR. DICKENS:

9 Q. In the third paragraph on the first page you
10 state:

11 "The a.i. content ..."

12 What is "a.i. content"?

13 **A. That's short for active ingredient. In this case**
14 **it means paraquat.**

15 Q. Okay. So paraquat, and then it says "PP796"; what
16 is that?

17 **A. PP796 is the emetic agent.**

18 Q. Okay. So paraquat plus the emetic:

19 "... can reasonably be anticipated to have the most
20 significant impact on the relative toxicity of alternate
21 paraquat SL formulations ..."

22 Do you see that?

23 **A. Yes, I see that.**

24 Q. "... however, the content of other co-formulants,
25 particularly surfactants, may also influence the absorption

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1 of paraquat and/or PP796 and hence impact the toxicity ..."

2 Now, that's what you record in 2012; right?

3 **A. Yes, it is.**

4 Q. And you agree with that statement as you sit here
5 today?

6 **A. I would stand by that statement today, yes.**

7 Q. Okay. And that emetic PP796, is that
8 valeric acid?

9 **A. No, it's -- valeric acid is a stenching agent,**
10 **a smell.**

11 Q. Okay. Is that one of the co-formulants that would
12 have been included that you're referencing?

13 **A. It was a -- it was a co-formulant used for certain**
14 **paraquat-containing formulations in the U.S.A.**

15 Q. Okay. Do you know whether or not -- when you are
16 discussing it in this particular case, whether or not that
17 would have been the stenching agent that would have been
18 included?

19 **A. Sorry, I am just trying to find the reference in**
20 **the ... so I think it was -- it was in -- it was not in --**
21 **Inteon and it was not in any proposed replacement**
22 **formulation.**

23 Q. Okay. Up here you say:

24 "The composition of the existing registered
25 formulation ..."

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1 Then you list A7813Q. Is that Gramoxone Inteon?

2 **A. Yes, I believe it is.**

3 Q. Okay. And as you said before, under "Surfactant
4 considerations," Inteon contains a small amount of
5 surfactant; right?

6 **A. Yes.**

7 Q. But even then, more surfactant would have been
8 required to be added to paraquat in the United States prior
9 to spraying, is your understanding?

10 **A. Yes, that's correct.**

11 Q. Then you say:

12 "The very low inclusion level of ... surfactant in
13 [Inteon] is unlikely to have a significant impact on the
14 rate or extent of absorption of paraquat or PP796."

15 Right?

16 **A. That was my view, yes.**

17 Q. Okay. And what you're talking about there is
18 the low inclusion level of what's already included within
19 the formulation itself?

20 **A. Yes, it is.**

21 Q. Not -- you're not discussing at all any amount
22 of surfactant that would be used by the end user prior to
23 actually spraying?

24 **A. No, I'm talking about the formulation as -- as**
25 **sold.**

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1 Q. Okay. And you further go on:

2 "Neither of the two alternative proposed
3 formulations contain this or any other surfactant ..."

4 Right?

5 **A. Yes.**

6 Q. Okay. But those two new alternative formulations
7 in the United States would've still required the inclusion
8 of a non-ionic surfactant by the end user prior to spray?

9 **A. In general that's correct.**

10 Q. Okay. If you could now turn to appendix 3, which
11 on the very bottom is page 32852.

12 Once again, this appendix, this is something that
13 you would have put together in putting this general product
14 safety evaluation together; is that right?

15 **A. I would've certainly co-ordinated this part of**
16 **the document, but I suspect that it was actually written by**
17 **one of my colleagues.**

18 Q. Okay. There's, as far as I can tell, no other
19 colleagues listed on this particular document; right?

20 **A. Yes, it would be standard practice not to have**
21 **multiple authors listing every contributor to the document.**

22 Q. Okay. So you're the only author, we agree with
23 that?

24 **A. We do.**

25 Q. Even if you didn't draft every word, it's

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1 certainly something you would have reviewed in 2012?

2 **A. It is. I mean, it's a document that I would have**

3 **owned.**

4 Q. Okay. You state:

5 "This document is limited in scope to summarising

6 what is known about the effect of surfactants on the safety

7 of formulations containing paraquat."

8 I read that correctly?

9 **A. That -- that's correct quotation.**

10 Q. Okay. And that is the purpose of putting this

11 document together, you'd agree with that?

12 MR. NARESH: Object to the form.

13 **A. Sorry, could you just clarify the question?**

14 BY MR. DICKENS:

15 Q. It's not necessary, I'll strike it.

16 "Product Safety Evaluation," you state:

17 "Surfactants are capable of disrupting the

18 structure and integrity of mucous membranes, such as the

19 gastrointestinal (GI) tract."

20 That's what you said in 2012; correct?

21 **A. That's what the document says, yes.**

22 Q. Okay. And that was your understanding in 2012;

23 right?

24 **A. Yes, it was.**

25 Q. You also understood that surfactants were capable

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1 of disrupting the structure and integrity of the human skin;

2 right?

3 **A. This document is discussing specifically, I think,**

4 **the acute oral toxicity of the product, so that's the**

5 **context in which it was written.**

6 Q. I understand that, but speaking of your knowledge

7 in 2012, you understood that surfactants were capable of

8 disrupting the structure and integrity to of the human skin?

9 MR. NARESH: Object to the form?

10 **A. I understood that surfactants may have an impact**

11 **on dermal absorption, yes.**

12 BY MR. DICKENS:

13 Q. Yes. In fact you said:

14 "For pharmaceuticals in this class there have been

15 a number of attempts to increase their oral bioavailability

16 using surfactants ..."

17 Right?

18 **A. Yes.**

19 Q. And that's something you knew in 2012?

20 **A. Yes.**

21 Q. Okay. That pharmaceuticals use surfactants to

22 increase the amount of -- that would be absorbed; right?

23 **A. Yes.**

24 Q. And were you also aware that surfactants were used

25 in pharmaceuticals to increase the amount of -- absorbed

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1 into the brain through the blood brain barrier?

2 MR. NARESH: Objection to the form and

3 the foundation.

4 **A. I have no recollection of that, no.**

5 BY MR. DICKENS:

6 Q. Okay. Now, you go on to cite a -- studies:

7 "... (Ferguson, 1972 - cited in Walters

8 ... 1976)."

9 Do you see that?

10 **A. Yes.**

11 Q. Okay. You say:

12 "An early comparison of absorption of paraquat

13 from the dog GI tract compared similar doses of paraquat as

14 a pure paraquat solution ..."

15 The "pure paraquat solution," that's just paraquat

16 on its own; right?

17 **A. Just paraquat in water.**

18 Q. Okay.

19 "... and Gramoxone W ..."

20 And you understand Gramoxone W to be a -- paraquat

21 mixed with a surfactant?

22 **A. It's my understanding Gramoxone W was**

23 **a formulation containing a built in adjuvant or surfactant,**

24 **yes.**

25 Q. Okay. So those two were compared in a study, and

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1 there was:

2 "... a tenfold increase in absorption of paraquat

3 from the formulation when compared to the pure paraquat ..."

4 That's what those studies found; right?

5 **A. That's what it says, yes.**

6 Q. Okay. So the study where it was Gramoxone with

7 the surfactant had a tenfold increase in the absorption than

8 paraquat on its own; right?

9 MR. NARESH: Objection to the form.

10 **A. Yes.**

11 BY MR. DICKENS:

12 Q. Okay. And you'd agree we discussed some of

13 the early animal studies on paraquat with respect to its

14 effects on the brain; you recall that?

15 MR. NARESH: Object to the form.

16 **A. Yes, I do.**

17 BY MR. DICKENS:

18 Q. And you'd agree that those studies were run on

19 paraquat on its own and not paraquat mixed with the

20 surfactant?

21 MR. NARESH: Objection to the form and

22 the foundation.

23 **A. I'm not sure that that's -- I mean, it's not**

24 **really comparable data because those studies were injection**

25 **studies, and surfactants' impact on dermal absorption or**

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1 oral absorption is not relevant.
2 BY MR. DICKENS:
3 Q. Okay. What is relevant, you'd agree, is to test
4 the effects on human health of the actual product that is
5 being sprayed by users out there in the field; right?
6 A. That is the ultimate objective, to understand
7 that.
8 Q. And the actual product that's being sprayed by
9 users in the fields in the United States isn't pure
10 paraquat; right?
11 A. It's almost pure paraquat, actually, in the
12 United States, yes.
13 Q. Okay. Almost? You agree, once again, a non-ionic
14 surfactant is mixed with it?
15 A. Yeah. Sorry, yeah, I think there was a slight
16 misunderstanding. Once it's tank mixed then, yes, it could
17 often be --
18 Q. So that's fair. So the Gramoxone that's being
19 used, that's almost pure paraquat, right, in the
20 United States?
21 A. Yes.
22 Q. But before the end user sprays that, they have to
23 go buy a surfactant, mix that in with the pure paraquat, and
24 then that's what they spray; correct?
25 A. That's routine, fact as to the best of my

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1 understanding.
2 Q. Okay. So the actual paraquat being sprayed by
3 those end users in the United States is the pure paraquat
4 mixed with a non-ionic surfactant?
5 A. I think that's correct.
6 Q. Okay. And so what would be relevant to the human
7 safety of end users in the United States is the degree of
8 toxicity of the end product, which is paraquat plus the
9 surfactant; right?
10 MR. NARESH: Objection to the form.
11 A. Again, I think it depends on the -- the context.
12 But from a risk assessment point of view, that would be your
13 interest from a -- you know, a spray operator point of view.
14 BY MR. DICKENS:
15 Q. Okay. And were there animal studies run by
16 Syngenta on the pure paraquat mixed with the non-ionic
17 surfactant?
18 A. I don't recall specifically what studies but I'm
19 quite sure that we have done many studies on dermal
20 absorption of multiple paraquat-containing formulations with
21 and without surfactants.
22 Q. Okay. Were any studies on the effects of -- on
23 the brain with respect to animal studies with paraquat and
24 a surfactant?
25 MR. NARESH: Objection to the form -- and

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1 the foundation.
2 A. Not to the best of my knowledge. And those
3 studies involve direct systemic administration of paraquat
4 into the animal, so the question of crossing dermal
5 membranes isn't a relevant one.
6 BY MR. DICKENS:
7 Q. Okay. One of the studies that was tested, the
8 dermal absorption studies on paraquat plus the surfactant,
9 is one you cited right here, Ferguson cited in Walters;
10 right?
11 A. Yes.
12 Q. Okay. And what that study found was tenfold
13 increase in dermal absorption of paraquat with a surfactant?
14 A. That's what it says, yes.
15 Q. Okay. So tenfold increase on -- in the absorption
16 rate of the end use product being sprayed by users in the
17 United States?
18 MR. NARESH: Objection to the form.
19 A. Well, I don't know what formulations these were in
20 terms of -- well, I guess there's a breakdown in
21 the document but exactly how they compare to current
22 formulations I think is slightly an open question. You
23 can't just characterize it by -- you know, with wetter or
24 without wetter.
25 BY MR. DICKENS:

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1 Q. Was Ferguson submitted to the EPA?
2 MR. NARESH: Objection to the form and
3 the foundation.
4 A. No knowledge.
5 BY MR. DICKENS:
6 Q. Do you have any knowledge whether Walters was
7 submitted to the EPA?
8 A. I have no knowledge of that.
9 Q. Do you know whether the EPA has -- strike that.
10 Was this product safety evaluation that you
11 prepared submitted to the EPA?
12 A. Not to the best of my knowledge.
13 Q. To the best of your knowledge, was any information
14 submitted to the EPA showing the dermal absorption rate of
15 paraquat mixed with the surfactant?
16 MR. NARESH: Objection to the form and
17 the foundation.
18 A. I don't know over the entire time period from
19 the 1960s through to the present day, but I believe multiple
20 dermal absorption studies were submitted to U.S. EPA over
21 the lifespan of paraquat products, some of which would've
22 included surfactants and some of which did not.
23 BY MR. DICKENS:
24 Q. Okay. Your statement goes to cite Walters and
25 says:

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1 "There was a corresponding increase in the
2 toxicity of the formulation, compared to the pure
3 paraquat ..."
4 Do you see that?
5 **A. Yes, I do.**
6 Q. Okay. So not only did the paraquat plus
7 the surfactant result in more absorption, it also resulted
8 in more toxicity?
9 **A. I'm not sure exactly which toxicity it's talking**
10 **about here but it could be corresponding dermal toxicity or**
11 **it could be corresponding oral toxicity, or both.**
12 Q. Okay. Now, you cited this article; correct?
13 **A. Yes.**
14 Q. So you've reviewed this article in the past.
15 **A. I don't believe I've ever reviewed that article.**
16 **As I said, I think this text may have been written by**
17 **a colleague. But it was a document which I owned.**
18 Q. Okay. So you signed off on it but didn't do
19 any -- again, a check to make sure the information is
20 accurate, is that fair?
21 MR. NARESH: Objection to the form.
22 **A. We don't normally go back to primary sources to**
23 **check the work of our colleagues.**
24 BY MR. DICKENS:
25 Q. Okay. Now turn to the page on the bottom, 32855.

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1 You list some conclusions here, do you see that?
2 **A. Yes.**
3 Q. Okay. It says:
4 "Some conclusions can be reached based on the
5 available data."
6 Right?
7 **A. Yes.**
8 Q. Okay. One of those conclusions:
9 "Surfactants have the potential to increase the
10 GI absorption and toxicity of paraquat ..."
11 **A. Yes.**
12 Q. "... but whether this [will happen] in practice
13 will depend on ..."
14 And then you list five factors; right?
15 **A. Yes.**
16 Q. Then you go on to say:
17 "The effects of the surfactants currently used in
18 paraquat formulations on the absorption and toxicity of
19 paraquat is unknown."
20 Do you see that?
21 **A. Yes, I do.**
22 Q. You'd agree that it was unknown as to what effect
23 surfactants mixed in with pure paraquat would have on
24 absorption and toxicity at this point in time; correct?
25 **A. That's what it says. I'm not quite sure whether**

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1 **this was a very -- I assume this was a very general**
2 **statement about the multiple surfactant systems we use**
3 **globally.**
4 Q. Okay. And understanding this is a general
5 statement, generally you'd agree that it was unknown by
6 those of you on the product safety team in Syngenta what
7 effect this surfactant would have when mixed with pure
8 paraquat?
9 MR. NARESH: Objection to the form.
10 **A. The specific effect of a specific surfactant at**
11 **a certain concentration, yes.**
12 BY MR. DICKENS:
13 Q. Okay. And you'd agree that that question is still
14 unknown as we sit here today?
15 MR. NARESH: Object to the form, foundation.
16 **A. I think the current situation is very similar to**
17 **what it was then, which is you could only address that**
18 **question when you know exactly which surfactant and exactly**
19 **which concentration you're talking about.**
20 BY MR. DICKENS:
21 Q. Syngenta, for users of Gramoxone, provide some
22 tank mix parameters with respect to how much surfactant
23 should be added; right?
24 **A. I don't know but I suspect that the label gives**
25 **an approximate concentration to be used in the spray tank.**

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1 **But there are many surfactants sold by different**
2 **distributors in the United States, all of which have their**
3 **own specific characteristics. It's one of the features of**
4 **the distribution network in U.S.**
5 Q. Okay. You'd agree Syngenta knows the primary
6 surfactants that are being sold in the United States to be
7 used with paraquat?
8 MR. NARESH: Object to the form and
9 the foundation.
10 **A. I don't know that. I'm sure that we have**
11 **individuals based in the United States who have that**
12 **knowledge, but I do not.**
13 BY MR. DICKENS:
14 Q. And at product safety team meetings there would be
15 discussions regarding additional tests or studies to be
16 undertaken with regard to paraquat; correct?
17 **A. That's correct.**
18 Q. Has there been any consideration or discussion of
19 trying to determine what the absorption and toxicity rate of
20 paraquat plus a non-ionic surfactant is as it is sold in
21 the United States?
22 MR. NARESH: Object to the form and
23 the foundation.
24 **A. Not that I recall. The assessment that you're**
25 **interested in is the assessment of safety to operators, and**

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1 normally that's determined by a much higher tier study,
2 which is a bio-monitoring study, so you're actually looking
3 at how much is absorbed rather than using dermal absorption
4 studies, which are a very crude assessment.

5 BY MR. DICKENS:

6 Q. Are you aware of studies or data within or --
7 strike that.

8 Are you aware of data generated from studies
9 conducted by Syngenta showing the inclusion of surfactants
10 and a formulation will include the speed at which peak
11 plasmic concentrations would be achieved?

12 A. I'm not aware --

13 MR. NARESH: Object to the form -- sorry.

14 A. Yeah. I'm not aware of such studies. Dermal
15 absorption studies don't normally involve any assessment in
16 animals for plasma concentrations. Typically dermal
17 absorption studies are in vitro studies, so non-animal
18 systems, because the whole thrust of their development in
19 the science is to not use live animals.

20 Q. You'd agree that at no point in time from 2008
21 into the present has Syngenta provided any warnings to
22 end users that the addition of a surfactant with paraquat
23 would increase the amount of dermal absorption; correct?

24 MR. NARESH: Objection to the form and
25 the foundation.

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1 A. I'm not aware of any specific warnings to that
2 effect, but what I am aware of is the labels call for use of
3 gloves when you're mixing the product. And in those
4 circumstances you would not expect any dermal absorption
5 across the globe.

6 BY MR. DICKENS:

7 Q. Okay. Move to strike.

8 With respect to the warnings provided to
9 individuals, you mentioned the label; that label is specific
10 to the pure paraquat; right?

11 MR. NARESH: May I just -- for the record,
12 an opposition to the motion, and I'll object to the form.

13 A. No, the product label is specific to
14 the formulation.

15 BY MR. DICKENS:

16 Q. Okay. But specific to the formulation and not
17 specific to the fact that the formulation would need to be
18 used with a non-ionic surfactant; correct?

19 MR. NARESH: Object to the form.

20 A. I -- I'm not quite sure I'm following your
21 question there.

22 BY MR. DICKENS:

23 Q. Okay. The -- we agree that the end use product of
24 Gramoxone in the United States is the Gramoxone formulation
25 with a non-ionic surfactant; correct?

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1 MR. NARESH: Object to the form.

2 A. Typically I think we've agreed that a user,
3 end user, would mix it with a surfactant in the spray tank
4 prior to application.

5 BY MR. DICKENS:

6 Q. Okay. And all I'm saying is the Gramoxone
7 formulation label wouldn't make any mention of the toxicity
8 or absorption rate of the end use product, which is
9 the paraquat mixed with the non-ionic surfactant?

10 MR. NARESH: Objection to the form and foundation.

11 A. No, it wouldn't, and it would be very
12 uninformative to the user if it did so.

13 BY MR. DICKENS:

14 Q. Okay. You'd agree that -- or strike that.

15 The -- Syngenta has never taken any steps to
16 inform end users of the product that the mixture of paraquat
17 with the surfactant may increase the toxicity of the product
18 right?

19 MR. NARESH: Objection to the foundation.

20 A. I don't know. I think -- was the question the
21 end user or the --

22 BY MR. DICKENS:

23 Q. The end user. Has any warnings been to the
24 end user?

25 MR. NARESH: Same objection.

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1 A. Not to my knowledge.

2 BY MR. DICKENS:

3 Q. We can put that aside.

4 Are you aware of any studies specifically
5 comparing the amount of dermal absorption of the Inteon
6 product versus Gramoxone Max?

7 A. I believe that studies were -- may have been
8 conducted prior to my joining product safety on that topic.

9 Q. And you say "may have"; do you know one way or the
10 other?

11 A. I don't know definitively, no.

12 Q. Now we can agree Syngenta has continually been
13 defending the safety of paraquat to prevent restrictions or
14 bans by regulatory agencies; correct?

15 MR. NARESH: Objection to the form.

16 A. I think we discussed that earlier and that has
17 been part of the company's activity.

18 BY MR. DICKENS:

19 Q. Okay. And part of that activity was to kind of
20 defend the safety of paraquat at all costs?

21 MR. NARESH: Object to the form.

22 A. I wouldn't agree with that. I think our remit is
23 to ensure that it is safe to use as -- not that it's safe at
24 all costs in the sense that -- yeah, so I wouldn't agree
25 with the exact characterization.