

Syngenta Corporation

2200 Concord Pike Tel 302 425 2000
P.O. Box 8353 Fax 302 425 2001
Wilmington, DE 19803-8353



October 27, 2003

Letter of Comment No: 50
File Reference: 1025-200
Date Received: 10/27/03

Mr. Lawrence W. Smith
Director of Technical Application
& Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Via Electronic Mail

Dear Mr. Smith:

File Reference No. 1025-200

We appreciate the opportunity to provide our comments regarding the FASB's Exposure Draft "Employers' Disclosures about Pensions and Other Postretirement Benefits". Syngenta Corporation is a wholly owned member of the Syngenta AG group. Syngenta AG is a Swiss based international company and an SEC registrant preparing our financial statements under International Accounting Standards (IAS) with reconciliation to US GAAP. Syngenta AG has defined benefit pension plans in many countries including the United States.

We agree with the overall objective to improve pension and other post retirement reporting. We also appreciate that you will consider the costs to implement versus the benefits of the proposed changes.

While we support certain recommendations as drafted, we have concerns about specific recommendations contained in the exposure draft. Our comments and concerns:

Issue 1 Plan Assets

We support the following required disclosures:

- a. Percentage of the fair value of total plan assets as of the date of each statement of financial position presented.

- b. Target allocation percentage or range of percentages, presented on a weighted-average basis.
- c. Expected long-term rate of return, presented on a weighted-average basis.

However, we disagree with the recommended disclosure of the range and weighted average of the contractual maturities, or term, of all debt securities, as displayed in Appendix C. We envision disclosures showing a range of debt securities from 1 to 20+ years. The weighted average term of debt securities may not add value to understanding the maturity of debt securities.

Issue 2 Defined Benefit Pension Plan Accumulated Benefit Obligation

We support the disclosure of the defined benefit pension plan accumulated benefit obligation.

Issue 3 Cash Flow Information

a. Benefit Payments

It is our understanding that the actuarial calculations required to meet this standard are complex and current actuarial systems do not provide this information. We expect additional cost will be incurred to change the actuarial systems.

Actual benefit payments could vary significantly from the actuarially determined estimated future benefit payments. Future benefit payments are significantly affected by:

- Annuity or lump sum payment decisions, where lump-sum payment options exist.
- Future benefit payments can vary significantly from estimate due to possible corporate restructurings.

Future benefit payments would be better disclosed as part of Management's Discussion and Analysis rather than footnotes to the financial statement.

b. Contributions

We support disclosing the contributions required by funding regulations or laws enacted at the reporting date, where these are fixed or determinable. We do not support the requirement to disclose future voluntary contributions. Actual voluntary contributions could change significantly from the estimate due to many business factors experienced during the year. In addition the estimated future voluntary contribution information may be considered forward-looking and better disclosed as part of Management's Discussion and Analysis.

It will be difficult for an international company to apply the definition of required contributions across reporting countries. For example, funding regulations in certain countries require employer and trustee to agree formally the amount of future contributions for a fixed future period, e.g. three years. These contributions may exceed the minimum required funding level for the plan. Is the classification of the above minimum contribution included as required or is it discretionary?

Issue 4 Assumptions

We support the disclosure recommendations as proposed by the board.

Issue 7 Measurement Dates

We support the FASB position on measurement dates.

Issue 8 Reconciliations of Beginning and Ending Balances of Plan Assets and Benefit Obligations

We believe the current reconciliation of plan assets and benefit obligations to be a value added report. This report clearly shows the movement in assets and benefit obligations over the reporting period. We do not see significant benefit in eliminating this report.

Issue 9 Disclosures Considered but Not Proposed

We support the FASB position on not requiring additional disclosures.

Issue 10 Disclosures in Interim Financial Reports

- a. Expense Reporting - We can accept the interim expense reporting requirement but we expect differences by quarter due to timing of actuarial valuation reports.
- b. Contributions - We support disclosing the minimum required contribution only, for the reasons stated under issue 3.

Issue 11 Effective Date and Transition

The implementation of this standard by 12/15/03 is a great concern. The new statement is expected to be published in mid-December, 2003. An international company will be required to make changes in internal financial reporting systems to meet these disclosure requirements. It will be difficult to achieve this across numerous countries and reporting entities to meet year-end 12/31/03 reporting requirements.

It is also our understanding that actuarial systems will require significant changes to produce reports needed to meet the new disclosure requirements. We believe actuaries will find it difficult to meet these deadlines, and that the quality of the information provided by the actuaries and reported by companies in their 2003 financial statements would likely be reduced.

In light of these concerns, we recommend changing the implementation date to 12/15/04.

Sincerely,

Matthew Viereck
Investment Manager
Syngenta Corporation

cc: Joseph Powell
Vice President Finance
Syngenta Corporation