

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:           Maureen Ohlhausen, Acting Chairman  
                                  Terrell McSweeney**

<p><b>In the Matter of</b>  <b>China National Chemical Corporation, a corporation.</b></p>	<p>) ) ) ) ) )</p>	<p><b>Docket No. C-4610</b></p>
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**COMPLAINT**

Pursuant to the Clayton Act and the Federal Trade Commission Act, and its authority thereunder, the Federal Trade Commission (“Commission”), having reason to believe that Respondent China National Chemical Corporation (“ChemChina”), a corporation subject to the jurisdiction of the Commission, has agreed to acquire Syngenta AG (“Syngenta”), a corporation subject to the jurisdiction of the Commission, in violation of Section 7 of the Clayton Act, as amended, 15 U.S.C. § 18, and Section 5 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 45, and it appearing to the Commission that a proceeding in respect thereof would be in the public interest, hereby issues its Complaint, stating its charges as follows:

**I. RESPONDENT**

1. Respondent ChemChina is a corporation organized, existing and doing business under, and by virtue of, the laws of the People’s Republic of China, with its office and principal place of business located at No. 62 Beisihuanxilu, Haidian District, Beijing 100080, People’s Republic of China. ADAMA Agricultural Solutions Ltd. (“ADAMA”) is a wholly-owned subsidiary

4. Respondent and Syngenta are corporations and at all times relevant herein have, either directly or through their subsidiaries,

#### **IV. MARKET STRUCTURE**

11. The markets for formulated crop protection products using the active ingredients paraquat, abamectin, and chlorothalonil in the United States are highly concentrated. Syngenta is the market leader in each of the three product markets, while ADAMA is either the largest or the

17. The Merger Agreement described in Paragraph 5 constitutes a violation of Section 5 of the FTC Act, as amended, 15 U.S.C. § 45.

**WHEREFORE, THE PREMISES CONSIDERED,** the Federal Trade Commission on this fourth day of April, 2017, issues its complaint against said Respondent.

By the Commission.

Donald S. Clark  
Secretary

SEAL: