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Manager: Regulatory Affairs

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syngenta

SAHA for African Centre for Biosafety
P.O. Box 31719
Braamfontein
2017

28 August 2013

Attention: Mr. Senkhu Maimane (FOIP Project Officer)

Re: Request for the latest available toxicological studies for mammalian and eco-toxicology for glyphosate submitted by Syngenta South Africa to the Registrar of Act 36 of 1947

Syngenta South Africa received the above request from SAHA on behalf of the African Centre for Biosafety to make available the latest toxicological studies for mammalian and eco-toxicology for glyphosate containing formulations submitted by Syngenta to the Registrar of Act number 36 of 1947 as per the requirement of PAiA.

We will like to place the following on record:

1. Usually the data you required are confidentially data and protected and cannot be made publically available.

2. Syngenta South Africa has a minor share in the glyphosate market in South Africa;

3. Your request document indicates that Syngenta South Africa has 13 applications of formulations containing glyphosate. Syngenta South Africa had initially 4 registered glyphosate-containing formulations, and 2 of them have since been cancelled. Therefore it is correct to say we have currently 2 registered products containing the active ingredient glyphosate;

4. Syngenta South Africa has registered the active ingredient, glyphosate, as a generic application and not as the main glyphosate manufacturer;

5. As per the current registration requirements of Act nr. 36 of 1947, for a generic application, the requirement does not request the submission of the toxicological studies for mammalian and eco-toxicology

Therefore, based on the above explanation and the nature of the data you requested, we are unable to send you the requested studies as they were never submitted to the Registrar of Act 36 of 1947 and are not in the requirements for a generic application such as the one we submitted for our glyphosate. You therefore would need to direct the request for these studies to the main registration holder of the active ingredient glyphosate.

Please do not hesitate to contact us for any clarity on this matter.

Kind regards

Antonie Delport
Director

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