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Glyphosate EU Regulatory Lead, Bayer AG
Chair of GRG Regulatory Working Group

By e-mail

July 1st, 2020

Subject: Disclosure of the AIR5 Glyphosate renewal dossier

Reply to your letter from June 17th 2020

Dear ██████████,

In reply to your aforementioned letter, I can confirm that indeed we ask for a complete dossier where confidential items are marked and confidentiality is motivated.

We are aware that there is no legal obligation for GRG to comply with our request now, but we think it will help very much to have sanitization in progress as soon as possible. If a request for disclosure is received by any one of the AGG-members, timelines are short for AGG to respond and there will not be much room for the sanitization process itself nor for clarification of the results.

Also it must be noted that a request for disclosure of the full dossier cannot be restricted to the new studies nor to the summary. We are aware of the burden this lays on the GRG, but we think that it would be prudent to do this in time. As stated earlier, there are short deadlines for the member states after receiving a request for disclosure and we must take into account the amount of items in the renewal dossier.

To make a start it would be very helpful if you could send the version of the summary dossier where confidential information is marked in red. Also sending us the new dossier items where confidentiality is marked as soon as you have them ready would be helpful.

We will check the markings in the justification form and decide on them and will inform you accordingly.

I must add however that each request for disclosure will need a separate decision from the AGG-members, taking into account national differences in law and case law which can influence the final decision. Nevertheless, we will give our feedback as detailed as possible.

Please do not hesitate to contact us if you have any questions regarding this request, including needed clarification on criteria or justification.

Sincerely yours,

On behalf of the Assessment Group for Glyphosate,

[Redacted signature block]