

Message

From: GARNETT, RICHARD P [AG/5040] [/O=MONSANTO/OU=EA-5041-01/CN=RECIPIENTS/CN=107838]
Sent: 10/22/2013 9:31:27 AM
To: UGALINO, ANA LIZA D [AG/5340] [/O=MONSANTO/OU=AP-5330-01/CN=RECIPIENTS/CN=102539]; KURNIAWAN, REDI FAJAR [AG/5235] [/O=MONSANTO/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RKURN]; AHLERS, ERIN M [AG/1000] [/O=MONSANTO/OU=NA-1630-01/CN=RECIPIENTS/CN=172788]; ROOSE, BART [AG/5035] [/O=MONSANTO/OU=EA-5035-01/CN=RECIPIENTS/CN=93643]; SALTMIRAS, DAVID A [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=DASALT]
CC: Z, ZAKIYAH [AG-Contractor/5235] [/O=MONSANTO/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ZZZZ768]; RUBIARTO, DODI [AG/8027] [/O=MONSANTO/OU=AP-5340-01/CN=RECIPIENTS/CN=653973]; SYAMAUN, ZULFADHLI [AG/8027] [/O=MONSANTO/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ZSYAM]; WAKIMORI, HIROO [AG/5270] [/O=MONSANTO/OU=AP-5340-01/CN=RECIPIENTS/CN=155939]
Subject: RE: Glyphosate 95TC - Indonesia
Attachments: Formaldehyde as an impurity of technical glyphosate for Indonesia.docx
Importance: High

Liza, Redi,

Please find attached the argumentation that

1. Formaldehyde is an impurity not an intentional component
2. Formaldehyde is formed in all glyphosate manufacturing processes. Monsanto minimizes the levels of this impurity
3. The impurity level is controlled by the FAO specification
4. That it is present at extremely low levels relative to those in our daily environment
5. These levels are below the threshold for toxic effects

Bart, David,

this is a development of what we prepared for the EU and FAO a couple of years ago. Please check that it remains accurate.

We need to complete this today because the deadline for submission is 9am European time and 3pm Indonesian time.

Thanks in advance for your comments and help.

Regards

richard

From: GARNETT, RICHARD P [AG/5040]

Sent: Tuesday, October 22, 2013 9:01

To: UGALINO, ANA LIZA D [AG/5340]; KURNIAWAN, REDI FAJAR [AG/5235]; RUBIARTO, DODI [AG/8027]; SYAMAUN, ZULFADHLI [AG/8027]

Cc: Z, ZAKIYAH [AG-Contractor/5235]

Subject: RE: Glyphosate 95TC

Redi,

Please see attached document which is the basis of the argument that I'll be working on in another hour after my next call. Comments welcome.

Regards

richard

From: UGALINO, ANA LIZA D [AG/5340]

Sent: Monday, October 21, 2013 22:51

To: KURNIAWAN, REDI FAJAR [AG/5235]; GARNETT, RICHARD P [AG/5040]; RUBIARTO, DODI [AG/8027]; SYAMAUN, ZULFADHLI [AG/8027]

Cc: Z, ZAKIYAH [AG-Contractor/5235]

Subject: RE: Glyphosate 95TC

Hi Redi,

Would it be possible to approach both ways? What is the recommendation of Pak Agus?

Is this the first time that the PC has rejected an application due to formaldehyde content?

I will send out an invite for a call today.

Thanks and regards,

Liza

From: KURNIAWAN, REDI FAJAR [AG/5235]

Sent: Monday, October 21, 2013 7:53 PM

To: GARNETT, RICHARD P [AG/5040]; RUBIARTO, DODI [AG/8027]; UGALINO, ANA LIZA D [AG/5340]; SYAMAUN, ZULFADHLI [AG/8027]

Cc: Z, ZAKIYAH [AG-Contractor/5235]

Subject: RE: Glyphosate 95TC

Hi Richard and all,

We outreach the expert team about the FAO spec and impurities, and he clearly understand the concept and in favor with us. However, during the pesticide committee plenary meeting he could not defend this information when there's challenge from people in the Ministry of Health, and at the end of the meeting the pesticide committee still rejects our product. Upon receiving this information I met some technical team members to get the clarity and their suggestion for this situation. I conclude there will 2 pathways in this situation:

1. Appealing or enforce this decision. Based on discussion, we may come to the pesticide committee members (chair or secretary) to explain about this situation. We need to have strong justification why this supposed not to be a problem (preparing white paper, reanalysis of the glyphosate TC and Roundup to see the content of formaldehyde, etc), or probably bring our expert from region to give the explanation.

I will send the letter requesting to have an audience meeting to the pesticide committee this week.

2. Immediately apply new registration for this material. I still need to get further information/clarity from the pesticide registration office regarding the procedure for this reapplication, considering this has been rejected in the previous window. We need to act very quickly if this will be our option, considering the registration window will be closed on Wednesday, and the next window will be on January 14.

I would kindly welcome all your suggestion...

Best regards,

Redi

From: GARNETT, RICHARD P [AG/5040]
Sent: Friday, October 18, 2013 9:39 PM
To: KURNIAWAN, REDI FAJAR [AG/5235]
Cc: UGALINO, ANA LIZA D [AG/5340]; Z, ZAKIYAH [AG-Contractor/5235]; RUBIARTO, DODI [AG/8027]
Subject: RE: Glyphosate 95TC

Redi,

Was this problem resolved?

Regards

richard

From: KURNIAWAN, REDI FAJAR [AG/5235]
Sent: Tuesday, October 01, 2013 13:10
To: GARNETT, RICHARD P [AG/5040]
Cc: UGALINO, ANA LIZA D [AG/5340]; Z, ZAKIYAH [AG-Contractor/5235]; RUBIARTO, DODI [AG/8027]
Subject: RE: Glyphosate 95TC

That's right Richard, our spec is within the FAO spec

Formaldehyde is in the negative list of herbicide formulation. I guess the technical team member does not consider/realize that this substance is there because of the impurity, and it is still in the limit range. Other thing is that he doesn't consider the dilution factor in the Roundup manufacturing process and at the point of use by the farmer, that make the formaldehyde content become very low.

Above points will be the point of discussion with the technical team member before the plenary meeting

Best regards,
Redi

From: GARNETT, RICHARD P [AG/5040]
Sent: Tuesday, October 01, 2013 7:43 AM
To: KURNIAWAN, REDI FAJAR [AG/5235]
Cc: UGALINO, ANA LIZA D [AG/5340]; Z, ZAKIYAH [AG-Contractor/5235]; RUBIARTO, DODI [AG/8027]
Subject: Re: Glyphosate 95TC

Redi,
We had a great meeting yesterday thank you.

Monsanto's specification is the basis of the FAO specification, so it would be surprising not to be accepted. What value for formaldehyde was submitted? Zaki's presentation showed <1 g/kg, I think..

From: KURNIAWAN, REDI FAJAR [AG/5235]
Sent: Monday, September 30, 2013 06:03 PM Central Standard Time
To: GARNETT, RICHARD P [AG/5040]
Cc: UGALINO, ANA LIZA D [AG/5340]; Z, ZAKIYAH [AG-Contractor/5235]; RUBIARTO, DODI [AG/8027]
Subject: Glyphosate 95TC

Hi Richard,

I hope you enjoy the visit to ID and have fruitful discussion with ID team. My apologies could not join the program due to a meeting in Cebu.

As Zaki may already update you, that this December our glyphosate technical registration will be expired. We have made the registration renewal process and expecting to get the decree in 2 month time.

However, unofficial information we got from pesticide registration officer, that our renewal has been rejected by technical expert due to the content of formaldehyde in our glyphosate.

This is not final decision yet, because there will be one more pesticide committee plenary meeting to make final decision. Since this information is unofficial, we cannot do official approach to explain about this matter to the pesticide registration office. Thus, while waiting for the plenary meeting, Zaki will arrange a discussion with the technical expert member to give explanation.

Did you experience similar situation before in other country?

The plenary meeting will be on 9-10 Oct. Once we receive a "not good" signal, I'll let you know and we can start preparing our response to do official appeal to the pesticide committee.

Pak Dodi,

To anticipate the long appeal process, would you please ensure that the stock of glyphosate will be sufficient to cover our production need?

Best regards,
Redi