



## **H3 Legal Solutions Pty Ltd**

Registration Number: 2024/239612/07

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10 November 2025

### **H3 CARE NPC**

Registration No: 2024/012345/08

Custodian of the 100-Site Lawful Participation Pilot

081 628 0791

### **H3 LEGAL SOLUTIONS (PTY) LTD**

Implementation & Legal Oversight Partner

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### **HEALTHPATH24 PTY LTD contracted to SYNERGY WELLNESS**

Clinical & Data-Validation Partner

#### **To:**

The Honourable Minister

Department of Trade, Industry and Competition (DTIC)

Private Bag X84

Pretoria, 0001

Honourable Minister,

#### **SUBJECT: REQUEST FOR MINISTERIAL RECOGNITION — 100-SITE LAWFUL PARTICIPATION PILOT**

We hereby reaffirm that Healthpath24 (HP24) remains fully contracted to and aligned with the Synergy Wellness Service Platform. Our role in this submission is that of clinical-support and product-system partners, operating within the governance and framework of the Synergy model and in full compliance with its established protocols and oversight mechanisms.

Sites operate under dual-track oversight from H3 Legal Solutions; privacy-based participation and controlled medical onboarding through Section 21 pathways coordinated by Healthpath24, with

product integrity supported by Mercurial Africa and Synergy Wellness. This structure ensures both regulatory compliance and clinical accountability across all pilot operations.

However, in order to ensure that this pilot project is implemented in accordance with constitutional and regulatory principles of fairness, non-discrimination, and equal access, it is respectfully proposed that the pilot include one (1) licensed cultivation and processing facility as a controlled and auditable production site.

This inclusion does not alter Synergy's operational ownership, primacy, or leadership within the framework. Instead, it serves to enhance the credibility, transparency, and long-term sustainability of the pilot by providing a legally compliant, verifiable supply chain throughout the duration of the project.

### **Facility Onboarding and Compliance Review**

The onboarding of a licensed cultivation and processing facility will be undertaken through a structured review and vetting process, ensuring that all relevant national standards and oversight criteria are satisfied, specifically covering:

- Quality-assurance and safety protocols;
- Traceability and record-keeping systems;
- Compliance with existing product and patient-care guidelines; and
- Community and legacy-grower upliftment mechanisms, aligned with the broader programme roadmap.

### **Benefits and Outcomes of the Inclusion**

#### **1. Regulatory Integrity**

The pilot will establish a lawful, traceable supply chain that can withstand regulatory and judicial scrutiny — providing a defensible, transparent model for future national replication.

#### **2. Non-Exclusion and Constitutional Compliance**

By preventing structural exclusivity, this measure ensures fairness and inclusivity, consistent with Section 9 (Equality) and Section 22 (Freedom of Trade, Occupation and Profession) of the Constitution. It eliminates any form of discriminatory gatekeeping or monopolistic practice.

### 3. **Strengthening of Synergy’s Long-Term Position**

This refinement reinforces Synergy’s leadership by creating a scalable and legally validated proof-of-concept that can expand across multiple sites without procurement or licensing irregularities.

### 4. **Community and Sector Development**

The inclusion of a second licensed facility builds a technical and knowledge base that supports mentorship, training, and the phased onboarding of emerging and community growers into future programme stages — advancing skills development and rural upliftment.

It is important to emphasise that this proposal does not dilute Synergy’s role nor introduce parallel supply structures. The licensed facility is a compliance mechanism, not a competitive partner. All product and service pathways remain within Synergy’s clinical and operational platform.

We present this as an aligned measure that ensures the pilot is both legally sound and scalable, reflecting our shared commitment to inclusive, accountable, and evidence-based wellness and medical product delivery.

Respectfully submitted,

Charl Botha (B.Proc.S.A)

H3 LEGAL SOLUTIONS *Cannabis Regulatory Advocacy & Compliance Advisory*

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