Annex I

Rationales, recommendations and work-plans for chemicals for which two notifications met the criteria of Annex II

B. Aldicarb

1. Rationale for the recommendation by the Chemical Review Committee that aldicarb (CAS NO 116-06-3) should become subject to the prior informed consent procedure and for the decision by the Committee to establish an intersessional drafting group to prepare a draft decision guidance document

1. In reviewing the notifications of final regulatory action by the European Community and Jamaica to ban aldicarb as a pesticide, together with the supporting documentation provided by those Parties, the Committee was able to confirm that those actions had been taken in order to protect the environment and human health.

European Community

2. Aldicarb was used in the European Community in granular formulation as an insecticide, nematicide and acaricide to control a wide range of insects, nematodes and aphids over a wide range of crops, including fruits (citrus, grape, strawberries, bananas), tomatoes, carrots, parsnips, brassica roots, leafy and headed brassica onions (bulb and seeds), potatoes, cereals, carnations, chrysanthemums, cotton, fodder beet, fodder peas, gladiolus, maize, ornamentals and perennial plants, roses and nurseries. All intended uses related to soil applications in granular form.

3. The notification and supporting documentation identified aldicarb as very toxic for human health by inhalation, if swallowed and in contact with skin. It was also very toxic to birds and mammals, non target arthropods and aquatic organisms and able to cause long term adverse effects in the aquatic environment.

4. The review of the data submitted for aldicarb revealed:

(a)That the risk to small birds cannot be minimized to an acceptable level even with granular applications;

(b)That available information from field studies about the effects of aldicarb and its metabolites on earthworms was considered insufficient to conclude that the risks were acceptable;

(c)That broadcast applications and application rates above 2.5 kg aldicarb/ha were unacceptable for aquatic organisms.

5. The first risk assessment performed for worker exposure concluded that the overall application by downward placement and band application might be acceptable but further exposure data were required. Usage of hand held equipment and overall application by broadcast was considered unacceptable for operators.

6. Additional information submitted for application in citrus using hand held injectors combined with a dermal penetration factor of 10% showed acceptable risk for operators under the condition that they were protected in accordance with label recommendations (“Wear suitable protective clothing and suitable gloves”).

Jamaica

7. The Committee noted that even though the substance was listed under the Second Schedule (Prohibited list) of the Pesticides Act 1975, aldicarb was being used on a few farms under a stewardship programme implemented by the manufacturer. The Pesticide Authority was established in 1992 and the Authority carried out a risk evaluation using results of studies conducted by the United States and the International Programme on Chemical Safety (IPCS) and comparing the worker exposure and leaching conditions with the conditions of use in Jamaica. The final regulatory action to refuse re-registration was in 1994.

8. This evaluation in Jamaica considered oral, dermal and inhalation toxicity for rats, rabbit and birds, WHO Classification 1, mobility in soils, solubility in water, half life and metabolites and concluded that the product presented a major risk to human health due to the high level of toxicity. Due to its solubility in water, it readily leaches to groundwater and poses a serious threat to water pollution. Its use is highly restricted in other countries due to risks to workers.

9. Small-scale farmers in Jamaica do not have access to protective clothing as confirmed through a survey conducted in Jamaica. Furthermore, the hot tropical climatic condition makes wearing protective clothing uncomfortable. Use of the product without protective clothing presents unacceptable risk to farmers.

10. Leaching of aldicarb to ground water was considered possible in Jamaica due to the presence of underground rivers in limestone areas across Jamaica where much of the farming is done. The risk evaluation considered the conditions under which water was contaminated by aldicarb in the United States and found that the same could occur in limestone areas in Jamaica. Even with the application of strong enforcement measures under conditions that were less susceptible to pollution than island ecologies like Jamaica, this did not prevent water contamination in the United States.

11. The evaluation concluded that adults and children might be exposed to high levels of aldicarb due to water pollution combined with contamination of food.

12. The risk evaluations performed by the European Community and Jamaica included assessments of the hazards (very toxic by inhalation and if swallowed, toxic in contact with skin, very toxic to aquatic organisms and birds) and the exposure (for human health, primarily occupational exposure, namely exposure of farmers, and for the environment, exposure of aquatic and terrestrial compartments) and therefore meet the criteria for a risk evaluation.

13. The Committee established that the final regulatory actions had been taken on the basis of risk evaluations and that those evaluations had been based on a review of scientific data. The available documentation demonstrated that the data had been generated in accordance with scientifically recognized methods and that the data reviews had been performed and documented in accordance with generally recognized scientific principles and procedures. It also showed that the final regulatory actions had been based on risk evaluations involving prevailing conditions of exposure within Jamaica and the European Community respectively.

14. The Committee noted that, as the regulatory actions in the European Community and Jamaica were complete bans on all uses, the risks to human health and the environment from aldicarb in the notifying Parties had been eliminated.

15. There was no indication that there were any industrial uses of aldicarb in either of the notifying Parties. The Committee also noted that the considerations underlying the final regulatory actions were not limited in applicability since similar concerns as those identified in the European Community and Jamaica could occur in other countries, in particular developing countries. On the basis of information provided at the fourth meeting of the Chemical Review Committee, the Committee concluded also that there was ongoing international trade in aldicarb.

16. The Committee noted that the final regulatory actions in the European Community and in Jamaica were not based on concerns about intentional misuse of aldicarb.

17. The Committee concluded that the notifications of final regulatory action by the European Community and Jamaica met the information requirements of Annex I and the criteria set out in Annex II to the Convention. The Committee also concluded that the final regulatory actions taken by Jamaica and the European Community provided a sufficiently broad basis to merit including aldicarb in Annex III to the Rotterdam Convention in the pesticide category.

2. Recommendation to the Conference of the Parties on the inclusion of aldicarb in annex III of the Rotterdam Convention

The Chemical Review Committee,

Recalling Article 5 of the Rotterdam Convention,

Concluding that the notifications of final regulatory action relating to aldicarb by Jamaica and the European Community meet the criteria set forth in Annex II to the Convention,

Decides, in accordance with paragraph 6 of Article 5 of the Convention, to recommend to the Conference of the Parties that it should include aldicarb (CAS NO. 116-06-3) in Annex III of the Rotterdam Convention as a pesticide.