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**Interim Chemical Review Committee**

Fourth session

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Item 5 (b) (ii) of the provisional agenda\*

**INCLUSION OF CHEMICALS IN THE INTERIM PRIOR INFORMED  
CONSENT PROCEDURE: CONSIDERATION OF DRAFT  
DECISION GUIDANCE DOCUMENTS  
DNOC**

**Note by the secretariat**

1. At its third session, the Interim Chemical Review Committee reviewed the notifications of final regulatory actions from the European Community and Peru, including the supporting documentation referenced therein, and, taking into account each of the specific requirements set out in annex II of the Rotterdam Convention, concluded that the requirements of that annex had been met
2. Accordingly, the Committee agreed to recommend to the Intergovernmental Negotiating Committee that DNOC should become subject to the interim prior informed consent (PIC) procedure, and agreed to establish an intersessional drafting group to produce a draft decision guidance document for that chemical.
3. The members of drafting group on DNOC, established by the third session of the Interim Chemical Review Committee, were Mr. M. Debois and Ms. M Bolaños (CoChairs); Mr. A. Abdelbagi, Mr. B. Kurlyandsky, Mr. W. Cable, Mr. H. Al-Obaidly and the Secretariat
4. A detailed work plan for the development of the decision guidance document was developed by the drafting group in line with the process adopted by the Intergovernmental Negotiating Committee at its seventh session (decision INC-7/6). The work plan was annexed to the report of the third session of the Committee and posted on the Rotterdam Convention website. The goal was to have a draft decision guidance document available for consideration by the Committee at its fourth session in March 2003.
5. On 25 March 2002 the secretariat circulated detailed guidance to the drafting group including a summary of the results of the third session of the Committee, a copy of the working paper on the preparation of internal proposals and decision guidance documents for banned or severely restricted

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\* UNEP/FAO/PIC/ICRC.4/1

chemicals and a list of the relevant supporting documentation. The co-chairs of the drafting group prepared an internal proposal document, based on the submitted notifications and supporting documentation and in consultation with the secretariat. This proposal and the draft working paper were circulated to members of the drafting group for comments on 13 June 2002. The documents were amended in the light of the comments received.

6. The draft decision guidance document on DNOC and the working paper were circulated to all members of the Interim Chemical Review Committee and observers<sup>1</sup> to the third session of the Committee, on 16 July 2002. Responses were received from members of the Committee and two observers (Chile and Italy). The draft decision guidance document on DNOC and the working paper were amended by the secretariat in consultation with the chairs of the drafting group in the light of the comments received.

7. A status report on the work of the drafting group, including a compilation of the comments and the amended draft decision guidance document were circulated to drafting group members 15 October 2002. As a result of this last round of comment several minor editorial changes were incorporated in the draft decision guidance document. A tabular summary of all of the comments received and how they were addressed will be available at the fourth session of the Interim Chemical Review Committee as document UNEP/FAO/PIC/ICRC.4/INF.2.

8. Annexed to this note is a copy of the draft decision guidance document on DNOC as submitted to the secretariat by the drafting group.

## I. ISSUES TO CONSIDER IN REVIEWING THE DRAFT DECISION GUIDANCE DOCUMENT ON DNOC

### A. Availability of additional relevant information

9. In preparing the draft decision guidance document the drafting group noted the existence of an Environmental Health Criteria document on DNOC published by the World Health Organization in 2000 (EHC 220, WHO/IPCS 2000). In line with the working paper on the preparation of internal proposals and DGDs for banned or severely restricted chemicals, a brief summary of the conclusions are included in the draft decision guidance document. The availability of this Environmental Health Criteria (EHC) document will also be noted on the Rotterdam Convention website.

10. No specific information on chemical or non-chemical alternatives to use of DNOC as a pesticide has been submitted to the secretariat.

### B. Response of the ninth session of the Intergovernmental Negotiating Committee to issues identified at the third session of the Interim Chemical Review Committee.

11. The Interim Chemical Review Committee at its third session noted that the regulatory actions notified by the European Community and Peru banned all uses of plant protection products containing DNOC. The Chemical Abstract Service (CAS) number referred to in the notification documents was for DNOC acid only, while the product had also been used in its salt formulations, which had different CAS numbers. The Committee agreed that there were two points that required further action:

- (i) that further clarification must be sought from the notifying authorities as to the precise scope of their regulatory actions. That information would be reflected in the draft guidance document.
- (ii) that the Intergovernmental Negotiating Committee should be asked for guidance on including in the interim PIC procedure substances not specifically identified in notifications

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<sup>1</sup> 16 countries, two non-governmental organizations and two intergovernmental organizations

12. The requested clarification provided by the European Commission and Peru indicated that the final regulatory actions applied to all forms of DNOC and has been reflected in the draft decision guidance document. The relevant correspondence will be available at the fourth session of the Interim Chemical Review Committee.

13. In reviewing this issue the ninth session of the Intergovernmental Negotiating Committee (INC) noted that the scope of the regulatory actions as stated in the notifications submitted in accordance with Article 5 was the basis for listing a given chemical. The INC agreed that, in the case of a chemical such as DNOC, it would be listed as “DNOC and its salts, such as ammonium salt, potassium salt and sodium salt”, along with the relevant CAS numbers, if included in the interim PIC procedure (para 77 UNEP/FAO/PIC/INC.9/21).



# ANNEX

Operation of the interim Prior Informed Consent procedure  
for banned or severely restricted chemicals in international trade

Draft Decision Guidance Document

**DNOC**  
**(Dinitro-*ortho*-cresol)**



**Interim Secretariat for the Rotterdam Convention  
on the Prior Informed Consent Procedure for  
Certain Hazardous Chemicals and Pesticides in  
International Trade**





## **Mandate**

The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade was adopted at the Conference of Plenipotentiaries held in Rotterdam on 10 and 11 of September 1998. The same Conference also adopted a Resolution on interim arrangements in order to operate an interim PIC procedure between the time of the adoption of the Convention and its entry into force, and to prepare for its effective operation once it enters into force.

*At its [insert number] session, held in [insert location] on [insert date] the Intergovernmental Negotiating Committee (INC) adopted the decision guidance document for DNOC [insert decision number] with the effect that this chemical became subject to the interim PIC procedure.*

*The present decision guidance document for DNOC was communicated to the Designated National Authorities on [insert date] with the request that they submit a response concerning future imports of the chemical to the Secretariat, in accordance with Article 10, paragraph 2 of the Rotterdam Convention.*

## **Disclaimer**

The use of trade names in this document is primarily intended to facilitate the correct identification of the chemical. It is not intended to imply any approval or disapproval of any particular company. As it is not possible to include all trade names presently in use, only a number of commonly used and published trade names have been included in this document.

While the information provided is believed to be accurate according to data available at the time of preparation of this Decision Guidance Document, the Food and Agriculture Organization of the United Nations (FAO) and the United Nations Environment Programme (UNEP) disclaim any responsibility for omissions or any consequences that may flow therefrom. Neither FAO or UNEP shall be liable for any injury, loss, damage or prejudice of any kind that may be suffered as a result of importing or prohibiting the import of this chemical.

The designations employed and the presentation of material in this publication do not imply the expression of any opinion whatsoever on the part of FAO or UNEP concerning the legal status of any country, territory, city or area or of its authorities or concerning the delimitation of its frontiers or boundaries

**ABBREVIATIONS WHICH MAY BE USED IN THIS DOCUMENT**

(N.B. Chemical elements and pesticides are not included in this list)

<	less than
≤	less than or equal to
<<	much less than
>	greater than
≥	greater than or equal to
>>	much greater than
μg	microgram
a.i.	active ingredient
AchE	acetylcholinesterase
ACGIH	American Conference of Governmental Industrial Hygienists
ADI	acceptable daily intake
ADP	adenosine diphosphate
ALT	alanine amino-transferase
AOEL	acceptable operator exposure level
ARfD	acute reference dose
ATP	adenosine triphosphate
BBA	Biologische Bundesanstalt für Land- und Forstwirtschaft
BOEL	biological operator exposure limit
b.p.	boiling point
BSI	British Standards Institution
bw	body weight
°C	Degree Celsius (centigrade)
CA	Chemicals Association
CAS	Chemical Abstract Service
CCPR	Codex Committee on Pesticide Residues
ChE	cholinesterase
CHO	Chinese hamster ovary
d	day
D	dust
DT <sub>50</sub>	period required for 50% dissipation
EC <sub>50</sub>	effect concentration, 50% (median effective concentration)
ED <sub>50</sub>	effect dose, 50% (median effective dose)
EHC	Environmental Health Criteria
ERL	extraneous residue limit
FAO	Food and Agriculture Organization of the United Nations
g	gram
GAP	good agricultural practice
GL	guideline level
h	hour
ha	hectare

**ABBREVIATIONS WHICH MAY BE USED IN THIS DOCUMENT**

(N.B. Chemical elements and pesticides are not included in this list)

IARC	International Agency for Research on Cancer
IC <sub>50</sub>	inhibition concentration, 50%
ICSC	International Chemical Safety Card
i.m.	intramuscular
i.p.	intraperitoneal
IPCS	International Programme on Chemical Safety
IPM	integrated pest management
ISO	International Organisation for Standardisation
IRPTC	International Register of Potentially Toxic Chemicals
IUPAC	International Union of Pure and Applied Chemistry
JMPR	Joint FAO/WHO Meeting on Pesticide Residues (Joint Meeting of the FAO Panel of Experts on Pesticide Residues in Food and the Environment and a WHO Expert Group on Pesticide Residues)
k	kilo- (x 1000)
kg	kilogram
K <sub>oc</sub>	organic carbon/water partition coefficient
K <sub>ow</sub>	octanol/water partition coefficient
l	litre
LC <sub>50</sub>	lethal concentration, 50%
LD <sub>50</sub>	lethal dose, 50%
LD <sub>0</sub>	lethal dose, 0%
LD <sub>100</sub>	lethal dose, 100%
LD <sub>Lo</sub>	lowest lethal dose
LOAEL	lowest observed adverse effect level
LOD	limit of detection
LOEL	lowest observed effect level
Log P	logarithm of the octanol/water partition coefficient
m	metre
mg	milligram
ml	millilitre
m.p.	melting point
mPa	millipascal
MRL	maximum residue limit
MTD	maximum tolerated dose
NCI	National Cancer Institute (United States of America)
ng	nanogram
NOAEL	no-observed-adverse-effect level
NOEC	no observed effect concentration
NOEL	no observed effect level
OECD	Organisation for Economic Co-operation and Development
OHS	Occupational Health and Safety
OP	organophosphorus pesticide

**ABBREVIATIONS WHICH MAY BE USED IN THIS DOCUMENT**

(N.B. Chemical elements and pesticides are not included in this list)

p	same as $K_{ow}$
Pa	pascal
PHI	pre-harvest interval
PIC	Prior Informed Consent
POEM	predictive operator exposure model
POP	Persistent Organic Pollutant
ppm	parts per million
RfD	reference dose (for chronic oral exposure. Comparable to ADI)
SMR	standardised mortality ratio
STEL	short term exposure limit
TADI	temporary acceptable daily intake
TER	toxicity/exposure ratio
TLV	threshold limit value
TMDI	theoretical maximum daily intake
TMRL	temporary maximum residue limit
TWA	time weighted average
ULV	ultra low volume
UNEP	United Nations Environment Programme
USEPA	United States Environmental Protection Agency
UV	ultraviolet
VOC	volatile organic compound
WHO	World Health Organisation
wt	weight

PIC – Decision guidance document for a banned or severely restricted chemical
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**DNOC**

Published: draft November 2002

<b>1. Identification and uses (see Annex 1)</b>
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<b>Common name</b>	<b>DNOC</b> (BSI, E-ISO). Throughout this Decision Guidance Document, DNOC means "DNOC and its salts, such as ammonium, potassium and sodium salts".
<b>Chemical name</b>	4,6-dinitro- <i>o</i> -cresol (IUPAC)
<b>Other names/ synonyms</b>	2-methyl-4,6-dinitrophenol (CAS) (Synonyms: 2,4-dinitro-6-methylphenol, 3,5-dinitro- <i>o</i> -cresol, 2,4-dinitro- <i>o</i> -cresol, DNC)
<b>CAS-No.(s)</b>	534-52-1 DNOC 2980-64-5 534-52-1 (DNOC) DNOC salts, such as ammonium salt (CAS no.2980-64-5), 5787-96-2 and potassium salt (CAS no.5787-96-2), and 2312-76-7 sodium salt (2312-76-7), which have other CAS numbers, are also covered by the PIC procedure.
<b>Harmonised System Customs Code</b>	2908.90 – active ingredient. 3808.10 – formulated product put up as insecticide. 3808.30 20 – formulated product put up as acaricide, fungicide and herbicide. 3808.30 – formulated product put up as herbicide.
<b>Category</b>	Used as a pesticide and as an industrial chemical.
<b>Regulated Category</b>	Pesticide
<b>Use(s) in regulated category</b>	Used as a defoliant in deciduous fruit tree orchards, as a post-emergent herbicide in apple orchards as well as a desiccant for potato haulm. Also used in the winter treatment of orchards as an insecticide, larvicide, and ovicide and fungicide.
<b>Trade names</b>	Antinonin, Bonitol, Dekrysil, Detal, Dinitrol, Dinitrosol, Effusan, Ibertox, K III, K IV, Kapsizole, Lipan, Luxan DNOC Crème 46%, Prokarbol, Supersinox SC, Technolor, Trifanex (130 g DNOC/1), Trifina, Trifocide SC (625 g DNOC ammonium salt/1), Trifocide 50%EC, 2,5 EC, Veraline 10.0% EC  <i>Trade names no longer in use:</i> Elgetol, Extar-A (Bayer), Nicil, Nitrador, Sandoline, Selinon 615 SC (Bayer), Sinox.

<b>Formulation types</b>	Available as free acid or salts (such as ammonium, or potassium or sodium salts) in a variety of formulations, such as soluble concentrate (SL), suspension concentrate (SC), emulsifiable (aqueous or oily) concentrate (EC), paste (PA), wettable powder (WP) or cream. The concentration of active ingredient (a.i.) in these formulations ranges from 130 to 560 g/l. It is not known if DNOC is also available in mixtures with other active ingredients.
<b>Uses in other categories</b>	Industrial use: DNOC is used in the plastics industry as an inhibitor of polymerisation in styrene and vinyl aromatic compounds. It is also used as an intermediate for synthesis of other fungicides, dyes and pharmaceuticals (IPCS, 2000).
<b>Production</b>	The world-wide annual production of DNOC was approximately 2000 tonnes in the 1950s, all of which was used in agriculture. Currently, of the 600 tonnes or so manufactured annually, 400-500 tonnes are used for industrial purposes and 100-200 tonnes as an agrochemical (IPCS, 2000).
<b>Basic manufacturers</b>	BAYER SA, ELF ATOCHEM AGRI B.V. (The Netherlands). <i>This is an indicative list of current and former manufacturers of DNOC. It is not intended to be exhaustive.</i>

## 2. Reasons for inclusion in the PIC procedure

DNOC and its salts, such as the ammonium, potassium and sodium salts is included in the PIC procedure as a pesticide. It is listed on the basis of the final regulatory actions to ban all agricultural uses of DNOC notified by the European Community and Peru.

No final regulatory actions relating to industrial chemical uses have been reported

### 2.1 Final regulatory action: (see Annex 2 for details)

#### European Community

The authorisations for plant protection products containing DNOC had to be withdrawn by 16 August 1999 in accordance with Commission Decision 1999/164/EC of 17/02/1999 (Official Journal of the European Community L54 of 02/03/1999, p. 21). From the latter date, no authorisations for plant protection products containing DNOC could be granted or renewed.

**Reason:** Concerns with regard to operator exposure and non-target organisms.

#### Peru

DNOC was prohibited for registration, import, local formulation, distribution, trade and use (Resolución Jefatural N° 182-2000-AG-SENASA). This prohibition of the pesticidal uses of DNOC entered into force on 9 October 2000 and is valid for formulations as well as for the technical material.

**Reason:** Concerns with regard to human health and the environment.

## 2.2 Risk evaluation

### European Community

Pursuant to Article 8 (2) of the Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market, DNOC was reviewed to determine whether or not it should be included in Annex I to this Directive (the list of active ingredients that can be used in plant protection products).

In the Member States, DNOC containing pesticides were registered for two main applications, which were considered in the risk evaluation:

Spraying onto fruit trees (apple trees, stone fruits, vine) to control aphids (including eggs), scales, mites, fungi (*e.g. Phomopsis viticola*), vectors of viruses, other sucking insects, acarids (*e.g. Colomerus vitis*) and other diseases. The intended doses to be used range from 840 to 8400 g of DNOC/ha once a year in orchards and viticulture as a winter spray.

Application as ammonium salt onto potatoes to prevent the development of infectious or viral diseases that could contaminate the tuber. The proposed application rates range from 2500 to 5600 g of DNOC/ha twice a year for the herbicide contact action as a desiccant for potato haulm.

Based on the information available and the proposed conditions of use, it was concluded from the evaluation that DNOC could not fulfil the safety requirements set out in Article 5 (1) (a) and (b) of Council Directive 91/414/EEC. The evaluation identified concerns with regard to the safety of DNOC, in particular with regard to operator exposure and non-target organisms. The main issues are detailed below.

### Human Health and Safety

From the toxicological assay results available, the following conclusions on DNOC health hazards were reached: DNOC is very toxic by inhalation, contact with skin and if swallowed. This active ingredient is a potential mutagen and the risk of irreversible effects cannot be excluded. DNOC is also irritating to the skin and may cause sensitisation by skin contact. The risk of serious damage to the eyes has been demonstrated.

No monitoring for operator exposure under normal conditions was performed. Therefore, the United Kingdom Predictive Operator Exposure Model (POEM) and the German model were used to evaluate the exposure for each category of application (orchard trees/potatoes). Toxicological data were missing in a number of key areas, but when using an AOEL (Acceptable Operator Exposure Level) of 0.0034 mg/kg/day, determined on the basis of the available data, exposure levels for an operator wearing gloves were of concern. For further details, see Annex I.

The residues, following an application consistent with good plant protection practices, were studied in order to assess any harmful effects on human or animal health. Considering the intended uses of DNOC, potatoes are the only foodstuffs that are likely to be contaminated. Residue levels in potatoes were lower than the Limit of Detection (LOD) of 0.05 mg/kg, which is identical to the proposed maximum residue limit (MRL). Assuming that the intake is equal to the LOD, consumer dietary exposure (for a standard person) was expected to be close to the temporary ADI of 0.001mg/kg/day that was established (for further details, see Annex I).

On this basis, it was concluded that potential operator exposure levels were of concern and that further data were required for all registered uses. In addition information was needed on the efficiency of gloves in reducing exposure. The potential dietary/consumer exposure from the consumption of treated potatoes was also of concern.

### **Environmental Impact**

From the available data, a high risk to mammals from all the intended uses, a high acute risk to aquatic life at higher application rates and a medium chronic risk to aquatic life were identified. DNOC is not very toxic to earthworms and only higher application rates pose a risk to them. The bioconcentration factor is low ( $\log P < 3$ ). DNOC is highly toxic to honey bees in laboratory conditions ( $LD_{50}$  oral: 2  $\mu\text{g}/\text{bee}$ ) but, has been shown to be only slightly toxic to them under field conditions.

After considering the test data available, it was concluded that DNOC is dangerous for the environment, as it is very toxic to terrestrial and aquatic organisms and may cause long term adverse effects in the environment.

**Note:** Effects on target organisms and toxicity/ecotoxicity for non-target organisms are due to either the phenolic form of DNOC or the phenolate once absorbed into the organisms. It does not matter from which form or salt the reaction started: in the organism there is rapid equilibration between the phenolic form and phenolate with various counter-ions (that are always present in organisms). The actual mode of action (*i.e.* interference with the energy-producing metabolism in the mitochondriae of the cells) is in general independent of the kind of cation present in the formulated plant protection product. Concerns related to this mode of action were the reason why the final regulatory action was intended to cover all salts of DNOC.

### **Peru**

DNOC was registered in Peru for use as a defoliant in deciduous fruit tree orchards (apple, peach tree, pear and plum trees / vineyard) and as a post-emergent herbicide in apple orchards to control *Chenopodium murale* L. and *Cenchrus echinatus* L.

Based on a study of occupational exposure of farmers using DNOC it was concluded that the risks of continued use were greater than the benefits obtained.

### **Human Health and Safety**

A study conducted in 1992 on the use of DNOC in the valley of Mala revealed that the level in the blood of applicators was significantly higher than in the blood of bystanders. Of the applicators interviewed, 73% admitted that they had suffered the poisoning symptoms explained to them. The following risk factors were observed among populations studied: long hours of exposure to the product, high application dose, short interval between applications, and lack of cleaning after application.

The toxicological hazards identified in the existing scientific data, taken together with the above study of exposure, indicate that the risk to farmers is high.

### **Environmental Impact**

DNOC is toxic to fish and to bees. It is highly phytotoxic.

### 3. Protective measures that have been applied concerning the chemical

#### 3.1 Regulatory measures to reduce exposure

**European Community** From the assessments made, it was concluded DNOC did not satisfy the safety requirements laid down in Directive 91/414/EEC, in particular with regard to acceptable operator exposure and exposure of non-target organisms. As a result, authorisations for all DNOC products had to be withdrawn.

**Peru** The registration, local formulation, distribution, trade and use of technical DNOC as well as formulations containing DNOC are were prohibited.

#### 3.2 Other measures to reduce exposure

*This section should only be completed where a chemical has been subjected to a severe restriction and the notifying countries have allowed continued use of the chemical and associated products.*

#### 3.3 Alternatives

DNOC is a broad-spectrum non-systemic insecticide and acaricide with contact and stomach action, contact herbicide and fungicide, used in a wide range of crops. There are a number of alternative methods involving chemical and non-chemical strategies, including alternative technologies available, depending on the individual crop-pest complex under consideration. Countries should consider promoting, as appropriate, integrated pest management (IPM) strategies as a means of reducing or eliminating the use of hazardous pesticides.

The European Community and Peru did not provide any specific information on alternatives to DNOC.

Advice may be available through National IPM focal points, the FAO, agricultural research or development agencies. Where it has been made available by governments, additional information on alternatives to DNOC may be found on the Rotterdam Convention website [www.pic.int](http://www.pic.int)

*It is essential that before a country considers substituting alternative pesticides, it ensures that the use is relevant to its national needs and the anticipated local conditions of use.*

#### 3.4 Socio-economic effects

No detailed assessments of socio-economic effects were undertaken by the notifying parties.

## 4. Hazards and risks to human health and/or the environment

### 4.1 Hazard Classification

<b>WHO</b>	<b>Technical a.i.:</b>	Ib (highly hazardous), classification based on oral toxicity in rats LD <sub>50</sub> : 25 mg a.i./kg bw (WHO 2000)			
	<b>Formulations:</b>				
		<b>Oral toxicity</b>		<b>Dermal toxicity</b>	
		LD <sub>50</sub> = 25 mg a.i./kg bw		LD <sub>50</sub> = 200 mg a.i./kg bw	
		a.i. (%)	hazard class	a.i. (%)	hazard class
	<b>Liquid</b>	> 10	Ib	> 50	Ib
		> 1	II	> 5	II
	<b>Solid</b>	> 40	Ib	> 20	II
		> 5	II	> 5	III
	> 1	III			
<b>European Community</b>	Classification of the active substance is: Mutagenic category 3; R 4068: possible risks of irreversible effects T+; R26/27/28: very toxic by inhalation, contact with skin and if swallowed Xi; R38: irritating to skin, R41: risk of serious damage to eyes R43: may cause sensitisation by skin contact R44: risk of explosion if heated under confinement. N; R 50/53: dangerous for the environment, very toxic to aquatic organisms, may cause long-term effects in the aquatic environment.				
<b>US EPA</b>	Category 1 (highly toxic) (EPA 1985)				
<b>IARC</b>	Not classified				

### 4.1 Exposure limits

#### Food

The Codex Alimentarius has not established any specific Maximum Residue Limits (MRLs) for DNOC.

The FAO/WHO Joint Meeting on Pesticide Residues (JMPR) reviewed DNOC in 1963 and 1965. It has not assessed a specific ADI or acute reference dose (ArfD).

#### Drinking Water

The WHO has not established a drinking water guideline value for DNOC.

## 4.2 Packaging and labelling

<b>Hazard Class:</b>	The United Nations Committee of Experts on the Transportation of Dangerous Goods classifies DNOC (UN number = 1598) in : Class 6, Division 6.1 (Toxic substances)UN Subsidiary Risks: 8
<b>Packing:</b>	UN Pack Group: II substances and preparations presenting a serious toxicity risk, formulations containing 50–100% DNOC (LD <sub>50</sub> (oral, rat) = 25 mg/kg bw). Special provisions: 43 When offered for carriage as pesticides, these substances shall be carried under the relevant pesticide entry (in the case of formulated products) and in accordance with the relevant pesticide provisions.
<b>Limited quantities:</b>	500 g is the maximum quantity per inner packaging authorised for transport of the substance.
<b>Storage:</b>	Separated from strong oxidants, food and feedstuffs.
<b>International Maritime Dangerous Goods (IMDG) Code:</b>	DNOC is classified as a marine pollutant. (amendment: IMCOCIMDG, IMO Dangerous Goods Code, Recommendation prepared by The Maritime Safety Committee, 26-91, 10054, 199130-00, 2000)

**For specific guidance on appropriate symbols and label statements regarding formulations of DNOC countries should consult the *FAO Guidelines on Good Labelling Practice for Pesticides (1995)***

## 4.3 First aid

*NOTE: The following advice is based on information available from the World Health Organisation (IPCS 2000) and was correct at the time of publication. This advice is provided for information only and is not intended to supersede any national first aid protocols.*

Signs and symptoms of acute DNOC poisoning in humans include yellowish skin tissues and nausea, vomiting, fever, gastric distress, restlessness, sensation of excessive heat, sweating, thirst, deep and rapid respiration, retrosternal pain, mental disorders, tachycardia, pyrexia, cyanosis, collapse and coma. Death is promptly followed by intense *rigor mortis*. A hot environment enhances the intensity of the symptoms and shortens the time before their onset. Acute DNOC poisoning runs a rapid course, and the general rule is either death or recovery within 24–48 h.

First aid personnel should wear nitrile over latex gloves to avoid contamination. Contaminated clothing and contact lenses should be removed as quickly as possible to prevent further absorption. If skin contact occurs, the area should be washed with soap and water. Eyes should be washed for 15–20 minutes with running water or saline solution. In the case of ingestion, if the victim is conscious and not convulsing, give 1 or 2 glasses of water to dilute the chemical. If the victim is unconscious or convulsing, do NOT give anything by mouth and do NOT induce vomiting. The stomach should be emptied as soon as possible by careful gastric lavage, preferably within one hour of ingestion. In massive overdoses, acute respiratory failure may occur. It is important to keep the airway open and to prevent aspiration if nausea and vomiting occur.

Persons who have been poisoned (accidentally or otherwise) must be transported immediately to a hospital and placed under the surveillance of properly trained medical staff. Where possible show the label of the DNOC container when the patient/affected person is presented for medical attention.

If the substance is formulated with solvent(s), also consult the International Chemical Safety cards (ICSC) of the solvent(s). Carrier solvents used in commercial formulations may affect the toxicity of the active ingredient by altering its extent of absorption from the gastrointestinal tract or through the skin ([www.inchem.org](http://www.inchem.org)).

#### **4.4 Waste management**

Regulatory actions to ban a chemical should not result in creation of a stockpile requiring waste disposal. For guidance on how to avoid creating stockpiles of obsolete pesticide stocks the following guidelines are available: FAO Guidelines on Prevention of Accumulation of Obsolete Pesticide Stocks (1995), The Pesticide Storage and Stock Control Manual (1996) and Guidelines for the management of small quantities of unwanted and obsolete pesticides (1999).

The European Community avoided creating stockpiles of DNOC by taking a stepwise approach to the phase-out of permitted uses (See Annex 2). It was considered that the risk was manageable during this phase out period.

In all cases waste should be disposed of in accordance with the provisions of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1996), any guidelines thereunder (SBC, 1994) and any other relevant regional agreements.

It should be noted that the disposal/destruction methods recommended in the literature are often not available in, or suitable for, all countries e.g. high temperature incinerators may not be available. Consideration should be given to the use of alternative destruction technologies. Further information on possible approaches may be found in Technical Guidelines for the Disposal of Bulk Quantities of Obsolete Pesticides in Developing Countries (1996).

#### **Annexes**

- Annex 1     **Further information on the substance**
- Annex 2     **Details on final regulatory action**
- Annex 3     **Addresses of designated national authorities**
- Annex 4     **References**

## **Introduction to Annex I**

The information presented in this Annex reflects the conclusions of the two notifying parties: the European Community and Peru. In a general way, information provided by these two parties on the hazards are synthesised and presented together, while the risk assessments, specific to the conditions prevailing in these parties, are presented separately. This information is contained in the documents referenced in the notifications in support of their final regulatory actions banning DNOC. The notification from Peru was first reported in the PIC Circular XIII of June 2001 and the notification from the European Community in PIC Circular XIV of December 2001.

DNOC was the subject of an IPCS Environmental Health Criteria document (Dinitro-ortho-cresol, EHC 220) published in 2000. The conclusions concerning the toxicity of DNOC were not substantially different from that reported here. Section 2.2.7. includes a brief summary of the conclusions of the European Community and IPCS evaluations.

The FAO/WHO Joint Meeting on Pesticide Residue (JMPR) assessed DNOC in 1963 and 1965. These evaluations are outdated and can be regarded as superseded by the reviews of the European Community and the IPCS. Accordingly, they were are not included here.

## Annex 1 – Further information on the substance

### 1. Physico-Chemical properties

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<b>1.1</b>	<b>Identity</b>	DNOC
<b>1.2</b>	<b>Formula</b>	C <sub>7</sub> H <sub>6</sub> N <sub>2</sub> O <sub>5</sub>
<b>1.3</b>	<b>Chemical name (IUPAC)</b>	4,6-dinitro- <i>ortho</i> -cresol
<b>1.4</b>	<b>Chemical type</b>	Dinitrophenol
	<b>Form</b>	Pure DNOC: yellow green crystalline powder
<b>1.5</b>	<b>Solubility</b>	In water: 0.213 g/l at pH4, 6.94 g/l at pH7, 33.3 g/l at pH10. At 25°C in toluene: 251 g/l, acetone: 514 g/l, dichloromethane: 503 g/l, ethyl acetate: 338 g/l, hexane: 4.03 g/l, methanol: 58.4 g/l
	<b>Log P</b>	1.78 at pH4, 0.087 at pH7, -1.32 at pH10
<b>1.6</b>	<b>Vapour pressure</b>	1.6 x 10 <sup>-2</sup> Pa at 25 °C
<b>1.7</b>	<b>Melting point</b>	85.2 – 89.9 °C
<b>1.8</b>	<b>Reactivity</b>	Hydrolysis: stable in sterile water at all pH after 5 days, DT <sub>50</sub> > 1 year
<b>1.9</b>	<b>Stability</b>	Risk of explosion if heated under confinement. Also risk of explosion when dry, which can be reduced by moistening with up to 10 % water. No auto-ignition below 400 °C. DNOC is a pseudo-acid and readily forms water-soluble salts with alkalis. The concentration of DNOC in ionised form increases as the pH increases and at pH ≥ 7, 100 % of DNOC is ionised.
<b>1.10</b>	<b>Molecular Weight</b>	198.13

## 2 Toxicological properties

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### 2.1 General

#### 2.1.1 Mode of action

DNOC is a substituted dinitrophenol compound. It acts mainly as an inhibitor of oxidative phosphorylation at the mitochondrial level, inducing a significant increase in basal metabolism and hyperthermy. The oxidation of carbohydrate forms the main source of energy of the body and the energy is “stored” in the form of compounds containing phosphate (high energy phosphate bonds of adenosine triphosphate or ATP). This compound is then a source of energy to the body. DNOC inhibits the formation of ATP. In the presence of DNOC the oxidative process continues and is even increased, but the energy cannot be converted to a useable form and it is therefore dissipated as heat. In muscle ATP cannot be re-synthesized and is progressively broken down to adenylic acid. The shortage of ATP may lead to muscular paralysis which for critical organs, such as heart and respiratory muscles, includes a blocking of their vital functions and in the case of death by DNOC poisoning, to early rigor mortis

#### 2.1.2 Symptoms of poisoning

DNOC is extremely toxic for human beings. Symptoms of acute toxicity include abnormal fatigue, excessive sweating, hyperthermia, tachycardia, headache, nausea, loss of appetite, coma and yellow pigmentation of the eye.

Exposures to high levels of DNOC for short periods may cause convulsions, unconsciousness and death. A hot environment enhances the intensity of the symptoms and shortens the time before their onset. Ingestion of DNOC for long periods may cause cataract and dermal eruption.

#### 2.1.3 Absorption, distribution, excretion, and metabolism in mammals

**Absorption:** The blood concentration is at a maximum 2-4 h after administration by the oral route to rats (1-100 mg/kg bw). Blood concentration maxima are reached It is 24 h and 48 h after dermal application (18 mg/kg bw, 8 h exposure) to female and male rats respectively. At the peak level, the plasma concentrations represented 2.5 and 5.0-5.8 % of the applied dose in of a water-based and an oily DNOC formulation respectively. Percutaneous absorption in In rabbits and rats , penetration by the percutaneous route was demonstrated, which increases with temperature.

**Distribution and excretion:** In general, the concentration of DNOC in the blood is much higher than in other tissues and, about over 90% of the DNOC in the blood burdens are found in the plasma. At 24h after a single radiolabelled Following oral administration dose to rats at 0.4 mg/kg, 15% of the administered dose was found in the blood, 6.6% in the gastrointestinal tract, 5% in the liver, 1.0% in the kidneys and 28% in the residual carcass. The faeces contained 10.1% of the radioactivity and urine 28.7% with a total recovery at 24 h of 94.4%/day, the highest concentrations are found in the blood, carcass, gastro-intestinal tract and eventually the liver after 24h. DNOC is relatively quickly eliminated in faeces (10% of the administered DNOC) and urine (28.7% of the administered DNOC). More generally, DNOC is excreted in urine as free DNOC and acetylated conjugate 6-ANOC, conjugated as 6-acetamido-4-

nitro-o-cresol (6-AcANOC).

**Accumulation:** The elimination half-life of a single oral dose in rats is 1–1.5 days. Studies in man show that DNOC has a tendency for accumulation with a half life that varies according to the authors from 4 to 7 days.

It is concluded that humans retain DNOC longer than other tested species.

**Metabolism:** The metabolic routes of DNOC appear to be comparable in rats and rabbits. The main metabolic pathway is the reduction of one of the 2 nitrated substituents of DNOC to form the amino derivatives viz. 6-amino-4-nitro-o-cresol (6-ANOC), and to a lesser extent to 4-amino-6-nitro-o-cresol (4-ANOC). One of the routes of metabolisation is the reduction of one of the 2 nitrated substituents either in position 4 to form the 4-amino derivative product, or in position 6 to form the 6-amino derivative product. Another route leads to the oxidation of the remaining methyl to form 3,5-dinitro-2-hydroxy benzyl alcohol.

## 2.2 Toxicology Studies

### 2.2.1 Acute toxicity

#### Oral

DNOC is very toxic by the oral route, with LD<sub>50</sub> values ranging from 20 to 85 mg/kg bw for rats, 16-47 mg/kg bw for mice, 50 mg/kg bw for cats, 200 mg/kg bw for sheep and 100 mg/kg bw for goats.

Signs of acute toxicity include hyperactivity, laboured breathing, asphyxial convulsions, coma and death. An increase in environmental temperature enhanced the acute toxicity of DNOC in rats.

#### Dermal

The acute dermal toxicity of DNOC is solvent-dependent corresponding to low to high toxicity in rats with LD<sub>50</sub> values ranging from 200 (water) to > 2000 mg/kg (moistened with peanut oil). The LD<sub>50</sub> is about 1000 mg/kg bw in rabbits

#### Inhalation

The LC<sub>50</sub> (aqueous formulation containing 50% DNOC, 4h) is 0.23 mg DNOC/l of air.

#### Irritation

DNOC is irritating to rabbit's skin and corrosive to rabbit's eyes (tests using New Zealand rabbits).

#### Sensitisation

DNOC induces skin sensitisation in 100% of guinea pigs tested according to the method of Magnusson and Klingman.

**Acute reference dose (ARfD):** No ARfD has been reported. .

### 2.2.2 Short-term toxicity

#### Oral

A six-week range-finding study was conducted on **rats** fed daily diets containing 0, 5, 13, 32, 80 or 200 mg/kg of 99.5% pure DNOC corresponding to 0, 0.44, 1.17, 2.89, 7.24 and 18.6 mg/kg bw/day. No treatment-related mortality was recorded. No significant effects were observed on food consumption, body temperature and haematology, and no abnormalities were seen at necropsy. However, at the two highest concentrations, the body-weight gain of the females was reduced, a slight, but significant decrease in alanine aminotransferase (ALT) activity was observed and the blood urea level was slightly, but significantly elevated in the females. The NOEL was set at 2.89 mg/kg bw/day.

In a 90-day feeding study, Wistar rats were administered a diet containing DNOC at doses equivalent to 0, 2.5, 5, 10 or 20 mg/kg bw. At the highest dose, 25 % of the rats died and mortality was also observed at 10mg/kg bw/day. The highest dose was well above the maximum tolerated dose which should be considered to be the next lower dose (10 mg/kg bw). At the two highest doses, body-weight gain was depressed in a dose-related manner; and levels of glucose and urea were increased in both sexes. No histopathological alterations were observed in any groups other than the high dose group. Levels of pyruvates and thyroid hormones T<sub>3</sub> and T<sub>4</sub> levels were decreased at all dose levels. In view of the decreased levels of pyruvate and thyroid hormones at all dose levels a definitive NOEL could not be established. The NOEL would be below the lowest dose level of 2.5 mg/kg bw/day.

A 90-day study was performed on **dogs** receiving 0.17, 0.89 or 4.82 mg/kg bw/day of DNOC in their diet. A limited number of biochemical examinations were performed. No mortalities were recorded. The main effects at the two highest doses were an increase in activity and a decrease in the prothrombin time in the males. A weight increase in the liver in the females was observed at the highest dose only. Food consumption was not changed at any dose level, but there was a reduction in body weight gain in both males and females. This effect is likely related to the mechanism of action of DNOC. The NOEL was set at 0.17 mg/kg bw/day based on the effect observed on body weights at the high concentration.

**Dermal, :** No information.

**Inhalation:** No information.

### 2.2.3 Genotoxicity (including Mutagenicity)

DNOC has been studied in many *in vitro* and *in vivo* systems with contradictory results. The European Community concluded that the available data were inconclusive, but in order to protect human health it decided to classify DNOC as mutagen Category 3.

**2.2.4 Long-term toxicity and carcinogenicity** In a two-year study male and female F-344 rats were exposed to DNOC at dietary concentrations of 0, 2.5, 15 or 100 mg of 99.5 % pure DNOC/kg. These concentrations were equivalent to a daily intake of 0.12, 0.75 and 5.03 mg/kg bw in the females and to 0.10, 0.59 and 4.12 mg/kg bw in the males. No significant difference in the mortality rate was observed in the same study between the groups. No clinical signs of adverse effects from the treatment were recorded. In the male rats treated at the highest concentration, food consumption was found to be slightly higher than in the controls (+6%) from week 5 onwards. An increase in food consumption was noted at 0.59 mg/kg bw/day in males from week 84 (+8%). No effect was noted on the body-weight gain of the animals. No significant alterations were recorded in the haematological and biochemical parameters evaluated in the course of the experiment. No carcinogenic effects were demonstrated over the course of the study. The NOELs for carcinogenic effects were set at 5.03 and 4.12 mg/kg bw/day in male and female rats respectively. The NOELs for long-term toxicity were set at 0.59 and 10 mg/kg bw/day in males on the basis of increased food consumption. (next lowest dose in the same study), and 5.03 mg/kg bw/day in females (highest administered dose).

**2.2.5 Effects on reproduction**

**Reproduction**

**Developmental effects**

In a teratogenic study groups of pregnant Wistar rats were exposed to DNOC equivalent to 0, 1, 5 and 25 mg/kg bw from the 6<sup>th</sup> to the 15<sup>th</sup> day of gestation. The high dose was maternotoxic and a decrease in food consumption was noted at the high dose. No sign of embryo or foetal toxicity was noted and no particular malformations were observed. A NOEL for maternotoxicity was set at 5 mg/kg bw/day. The NOEL for fetotoxicity was set at 25 mg/kg/day (the highest dose tested).

Groups of pregnant rabbits received doses of 0, 4.0, 10.0, 25 mg DNOC/kg bw/day by gavage on days 6–18 (inclusive) of gestation. The highest dose was maternotoxic; these dams showed clinical signs of toxicity and produced litters with increased incidence of either external or visceral malformations or skeletal variations. The NOEL for teratogenicity was set at 10 mg/kg bw/day. A study was conducted in rabbits by the oral route. At 22 mg/kg bw/day, teratogenic effects of DNOC were evidenced, being hydrocephalia, microcephalia, incomplete ossification of the sternebra and bones of the phalanx. However, this dose is a maternotoxic dose. The teratogenic NOEL was set at 10 mg/kg bw/day.

**2.2.6 Neurotoxicity/ Delayed neurotoxicity**

Neurotoxic effects are not expected given the molecular structure of DNOC and were not observed in subacute and chronic toxicity studies in several animal studies.

**2.2.7 Summary and overall evaluation**

**Note:** Effects on target organisms and toxicity/ecotoxicity for non-target organisms are due to either the phenolic form of DNOC or the phenolate once absorbed into the organisms. It does not matter from which form or salt the reaction started: in the organism there is rapid equilibration between the phenolic form and phenolate with various counter-ions (that are always present in organisms). The actual mode of action (*i.e.* interference with the energy-producing metabolism in the mitochondriae of the cells) is in general independent of the kind of cation present in the formulated plant protection product. Concerns related to this mode of action were the reason why its final regulatory action was intended to cover all salts of DNOC.

**European Community**

Human beings are more likely to accumulate DNOC than other mammals, due to a slower elimination rate.

The oral LD<sub>50</sub> in rats ranges from 20 to 85 mg/kg bw, thus classifying the active ingredient as very toxic if swallowed according to European Community rules.

The dermal LD<sub>50</sub> in rats is in the range of 200 to over 2000 mg/kg, depending on the solvent applied, thus classifying DNOC as very toxic by contact with the skin according to European Community rules.

Inhalation LC<sub>50</sub> values of 0.23 mg/l for a 4 h exposure in rats classify DNOC as very toxic if inhaled according to European Community rules. DNOC is irritating to the skin (New Zealand rabbits), corrosive to the eye (New Zealand rabbits) and is a skin sensitiser in guinea-pigs.

Short-term dietary administration of DNOC for up to 90 days decreased body-weight gain in rats and dogs, usually without significant alteration in food consumption. At high doses the liver was affected. Blood urea levels were also increased at high dosages.

In a long-term dietary feeding study in rats, DNOC did not induce any treatment-related adverse effects at doses of up to 5 mg/kg bw/day. No increase of any type of tumour was observed.

On the basis of all the data available, the mutagenicity of DNOC remains equivocal.

Teratogenic effects were observed only at maternotoxic doses.

No ARfD was established.

The calculation of the ADI was carried out from the NOEL in the most sensitive species. From the two-year study in rats, it was established as 0.1 mg/kg bw/day. Given that in this study no carcinogenic effects were shown and that teratogenic effects were demonstrated at higher doses in rabbits, a safety factor of 100 was used:  $ADI = 0.1/100 = 0.001$  mg/kg/day. The choice of this ADI allows a margin of safety (MOS) of 10,000 with respect to the teratogenic risk as the teratogenic no-effect level by oral administration in rabbits is 10 mg/kg bw/day.

**IPCS 2000**

The International Programme on Chemical Safety (IPCS) published an Environmental Health Criteria document on Dinitro-ortho-cresol (DNOC) in 2000 (EHC 220).

DNOC is an uncoupler of oxidative phosphorylation and toxic effects observed either in human or in animals result from this mechanism.

Clinical symptoms occur after a relatively short period of exposure. Symptoms include nausea, gastric distress, restlessness, a sensation of heat, excessive sweating, thirst, deep respiration, tachycardia and hyperpyrexia. In severe cases, collapse, coma and death occurred within 24 – 48 h.

The metabolic pathway of DNOC is qualitatively similar across several species. However the rate of DNOC elimination varies substantially across species. Human retain DNOC longer than other species tested

In animal studies the oral LD<sub>50</sub> values, as determined in several species, range from 16 – 100 mg/kg bw

On the basis of all the data available the mutagenicity of DNOC remains equivocal

A rat carcinogenicity study did not show any carcinogenic effects. Histopathological examination did not reveal any alteration in any organ that could be attributable to an effect of the treatment with DNOC. No increase in the incidence of any type of tumour was recorded. A **NOEL** of 0.59 mg/kg bw/day. was determined in males on the basis of increased food consumption, and 5.03 mg/kg bw/day in females (highest administered dose).

In a multi-generation reproduction study male and female Sprague-Dawley rats were exposed to 15, 30 and 100 mg DNOC/kg diet throughout maturation, mating, gestation and lactation phases for two successive generations. At the highest dose, during the gestation phase of the F<sub>0</sub> generation there was a significant reduction in mean body weight, and a reduction in food consumption during lactation. In this group the mean litter size and weight at birth were comparable to controls, but were reduced on days 14 and 21 of lactation. The **NOEL** was set at 30 mg/kg diet, equivalent to 1.73 mg/kg bw/day for the F<sub>0</sub> males, 2.24 mg/kg b.w./day for the F<sub>0</sub> females, 2.40 mg/kg b.w./day for the F<sub>1</sub> males and 2.61 mg/kg b.w./day for the F<sub>1</sub> females.

Teratogenicity studies performed in rats and rabbits showed that DNOC induced embryotoxicity and teratogenic effects only at dose levels that were also maternally toxic. In rats the No Observed Adverse Effect Level (**NOAEL**) for teratogenicity and for embryotoxicity was set at 25 mg/kg/bw/day. (highest dose tested). In rabbits the **NOAEL** was set at 10 mg/kg/bw/day for foetal effects, on the basis of the malformations observed in the high dose group.

### 3 Human exposure/Risk evaluation

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#### 3.1 Food

##### European Community

DNOC was registered for application on fruit trees when no fruits and haulm were present. The treatment was carried out in winter 5 to 6 months before harvest. DNOC is not systemic and is rapidly degraded.

Potatoes were treated at 5 kg/ha and only four trials were acceptable (7 days of pre-harvest interval). The residue levels were 0.02 mg/kg or less.

No significant residues of DNOC are expected in potatoes and fruits when plants are treated with DNOC. As DNOC has not been actually detected in treated fruits and potatoes, MLRs were set at the level of 0.05 mg/kg, corresponding to the limit of detection of the residue determination method. Assuming a typical consumer, an adult of 60 kg, and assuming consumption is 328.5 g of potatoes per person per day, the estimated residue intake is 0.00027 mg/kg bw/day or 27% of the ADI.

The maximum residue intake through feed for dairy and beef cattle, pigs and chickens was calculated assuming residues for potatoes at the MRL level (0.05 mg/kg). The theoretical residue intake ranges from 0.0016 mg/animal/day for chickens to 1.8 mg/animal/day for beef cattle.

It was concluded that residues might appear on potatoes and in potato-eating animals, whereas for fruit on fruit trees, the interval between treatment and harvest is great enough to avoid any significant residue.

#### 3.2 Air

DNOC has a low potential to volatilise. Significant exposure of the general population is not expected.

#### 3.3 Water

Not relevant

#### 3.4 Operator Exposure

##### European Community

In line with internationally accepted practices, the occupational risk evaluation was based on hazard characteristics and worker exposure. There were no measured worker exposure studies for mixing, loading or application of DNOC. Therefore the United Kingdom POEM model was used to estimate exposure for the proposed uses in potatoes and in orchards.

An Acceptable Operator Exposure Level (AOEL) was established based on the NOEL of 0.17 mg/kg bw/day in a 90 day study on dogs and using a 50 fold safety factor:

$$\text{AOEL} = 0.17 \text{ mg/kg/day}/50 = 0.0034 \text{ mg/kg/day}$$

The safety factor was established based on the following considerations:

- The nature of the protocol (limited with regard to biochemical examination) in the 90 day dog study
- The results of the mutagenicity studies were ambiguous

- The lack of a fertility study over two generations and a carcinogenicity study in a second species

**Orchard use:**

The following parameters were used for the evaluation during the treatment of orchards with a formulation containing 560 g DNOC/l:

- Quantity applied: 8.4 kg of DNOC/ha (highest recommended use)
- Surface treated: 5 ha/day/person (this is a relatively small surface),
- Volume sprayed: 1,500 l/ha (highest recommended use)
- Packaging: jerry can of 10 IL with an opening of 49 mm.

Under these conditions, a 70 kg operator without any special protection either during preparation or during spraying is exposed to 0.49 mg/kg/day, taking into account a permeability through the skin of 5%, which is a low estimate. This exposure is of the order of 144 times greater than the AOEL (0.0034 mg/kg/day).

For a 70 kg operator wearing gloves the exposure becomes 0.039 mg/kg/d. This exposure remains 10 times greater than the AOEL.

**Potato use:**

The following parameters were used in the evaluation of a formulation containing 200 g/l of DNOC ammonium salt used as a desiccant for potatoes haulm:

- Quantity applied: 5 kg/ha/day/person
- Surface treated: 10 hectares/day/person (this is a relatively small surface)
- Volume sprayed: 500 l/ha
- Packaging: jerry can of 20 IL with an opening of 49 mm.

Under these conditions, a 70 kg operator without any special protection either during the preparation of the formulation to be sprayed or during spraying is exposed to 0.401 mg/kg bw/day, taking into account a permeability through the skin of 5%, which is a low estimate. This exposure is of the order of 118 times greater than the AOEL (0.0034 mg/kg/day).

For a 70 kg operator wearing gloves the exposure is 0.073 mg/kg/day. This exposure remains over 20 times greater than the AOEL.

**Peru**

A study was conducted on the use of DNOC in the valley of Mala. In 1991, 97 farmers exposed to DNOC were examined and 86 in 1992 (within 24 hours, exceptionally 48 hours) after the end of a working day spraying DNOC. The following findings were obtained:

- The levels of DNOC in the blood of the applicators and bystanders were measured, revealing significant statistical differences between the two groups.
- The farmers were unaware of the real risk in using this pesticide and, when they were informed, paid little attention.
- 80% of the target population did not use the protective clothing recommended by WHO while applying the product.
- 73% of the applicators interviewed admitted they had suffered the poisoning symptoms explained to them.
- It was confirmed that DNOC blood levels are eliminated in six to eight weeks.
- The following risk factors were observed among the studied populations: long hours of exposure to the products, high application doses, short intervals between application, lack of cleaning after applications.
- The complaints most frequently suffered by farmers exposed to DNOC were: polydipsia, fatigue, feeling hot, cephalalgia, suffocation, giddiness, blurred vision, diarrhoea, general malaise, nausea and vomiting. However, the farmers considered the situations to be "normal".

Complaints were also received from workers, whose DNOC blood concentration was below the so-called danger level of 10 ppm (NIOSH). At those levels, symptoms, although not specific, can be recognised as part of the symptomatology of DNOC poisoning.

**3.5 Medical data**

Data from the literature report cases of intoxication resulting from very prolonged exposure in hot weather. The symptoms reported were abnormal fatigue, perspiration, and a sensation of heat and weight loss. The degradation of the general state of the person intoxicated can be quick with tachypnea, tachycardia, and significant important hyperthermia, which may lead to death. One of the important characteristic post-mortem effects is the quick appearance (45 minutes to 1 hour) of *rigor mortis*. In the case of light or moderate exposure, the return back to normal is quick (48 to 72 hours) following exposure, without any after-effects. It should be added that the product is irritating and sensitising to the skin and caustic to the eyes. No treatments, other than symptomatic, can be recommended.

The survey data from Peru confirm that DNOC increases the basal metabolic rate, without proportionally stimulating the cardiovascular system. Effects on the gastrointestinal tract and on the nervous system have also been observed on Peruvian workers exposed to this product.

## 4 Environmental fate and effects

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### 4.1 Fate

#### 4.1.1 Soil

**Mobility:** At a low pH, the adsorption of undissociated DNOC to particulate is strong. However, at an environmentally relevant pH DNOC is weakly adsorbed on soil. In a study using three soil types, adsorption was less than 15.4 % after 16 h. Apparent adsorption substantially increased over a longer period but this was likely due to degradation of the compounds. The values of  $K_{oc}$  ranged from 53 to 195, for the various soils and concentrations. DNOC is expected to be mobile in soil but, due to rapid degradation, aged residues containing DNOC and its major metabolite (likely 2-methyl-4-nitrophenol) are shown to have a low potential for leaching in soil (leachates from soil columns were 0.9-5.8 %, mainly as polar metabolites).

The degradation of DNOC in **sterile soil** was not investigated.

The **biodegradation** of DNOC under aerobic conditions in soils is rapid. It was investigated in three types of standard soils over a period of 88 days, at 20 °C, in the dark: at concentrations equivalent to a field application rate of 5 kg DNOC/ha,  $DT_{50}$  values were less than 12 days at 20°C and 15 days at 5°C. Degradation proceeds via unidentified polar metabolites. The ring moiety is highly mineralised (>40 %) and bound residues are <40 %. The main non-volatile metabolite was tentatively identified as 2-methyl-4-nitrophenol, which peaks at 14 before decreasing to a low level. Other metabolites remain at low levels.

Degradation under anaerobic conditions and **photodegradation** in soil have not been studied as DNOC is rapidly degraded in the upper soil layer.

#### 4.1.2 Water

DNOC is stable in sterile water at any pH.

The  $DT_{50}$  in surface water is 3-5 weeks. The  $DT_{50}$  value of photodegradation in aqueous systems might be around 253 hours (10.5 days). Experiments do not provide reliable information on the degradation rate in water/sediment systems.

DNOC is moderately adsorbed on aquatic sediment.

#### 4.1.3 Air

DNOC has a Henry's law constant of  $2.46 \times 10^{-7}$  atm.  $m^3/mol$  and therefore will not volatilise from surface water. Due to the low volatility of DNOC, the active substance is not expected to be found in significant amounts in air.

#### 4.1.4 Bioconcentration

$\log P < 3$ . Generally, compounds with  $\log P < 3$  do not bioconcentrate.

**4.1.5 Persistence** DNOC is not expected to accumulate in soil as the DT<sub>50</sub> values for aerobic degradation are less than 12 days at 20°C and 15 days at 5°C. With a DT<sub>50</sub> of 3-5 week in aerobic surface water, and a photodegradation DT<sub>50</sub> value of 10.5 d, DNOC is not likely to persist in water systems either.

**4.2 Ecotoxicity – Effects on non-target organisms**

**4.2.1 Terrestrial vertebrates**

**Mammals** LD<sub>50</sub> (rat, oral)= 26 mg/kg bw (LD<sub>50</sub> value retained for the European Community risk evaluation)

**Birds** LD<sub>50</sub> = 8.3 mg/kg (pheasants),  
 = 15.7 mg/kg (Japanese quail),  
 = 23 mg/kg (duck),  
 = 8-25 mg/kg (partridge)  
 LD<sub>0</sub> = 1.4 mg/kg bw (pheasants)  
 = 4.4 mg/kg bw. (partridges)  
 LC<sub>50</sub> = 637 mg/kg diet (Japanese quail)

Mortality occurs quickly after administration

Concentrations on the treated grain fed to birds equivalent to the field use of 3.5 kg DNOC /ha, had a repellent effect on the birds.

**Aquatic Species**

**Fish** LC<sub>50</sub> = 6-13 mg/l (carp)  
 = 0.45 mg/l (96 h, trout)  
 = 0.95 mg/l (96 h, bluegill)

**Aquatic invertebrates** LC<sub>50</sub> (24 h) = 5.7 mg/l (daphnia)  
 NOEC (14 d) = 0.6 mg/l (daphnia)

**Algae** LC<sub>50</sub> (96 h) = 6 mg/l

**4.2.3 Honey Bees & Other arthropods** Bees: LD<sub>50</sub> (acute oral) = 2.04 ± 0.25 µg/bee, suggest that DNOC is moderately toxic to honey bees

When bees were exposed in a field experiment to a crop (*Brassica napusrape*) treated at a rate of 5 kg a.i./ha, only 4.8 % mortality was observed, showing that under normal field conditions, the risk to honey bees from DNOC- treated crops is lowis only slightly toxic to honey bees. Other arthropods: no data

**4.2.4 Earthworms** LC<sub>50</sub> (7 days) = 17 mg/kg of soil.  
 LC<sub>50</sub> (14 days) = 15 mg/kg soil.

**4.2.5 Soil micro-organisms** At a concentration of 2.5 mg/kg of soil, DNOC stimulates respiration (formation of CO<sub>2</sub> resulting from decomposition of the organic components of the soil by the microflora).

**4.2.6 Terrestrial plants** No data available. May be phytotoxic.

## 5 Environmental Exposure/Risk Evaluation

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### 5.1 Terrestrial Vertebrates

#### Mammals and birds

The risk evaluation of the use of DNOC in the European Community was performed taking into account the intended applications notified for authorisation. Application rates of 0.8 to 8.4 kg a.i./ha were considered in vines and orchards and 5.6 kg a.i./ha for potatoes. For calculations, the LD<sub>50</sub> values of 26 mg/kg bw and 8.3 mg/kg bw were used as reference for the acute toxicity in mammals and in birds respectively.

The Toxicity/Exposure Ratios (TER) were calculated for small and medium-sized grazing or insect eating mammals and birds. These TERs must be greater than the trigger value (10) established in the European Community. All application rates lead to TERs lower than the trigger value, ranging from 0.04 (high rate) to 0.6 (low rate). Therefore, there was evidence of unacceptable risks for all the applications notified for authorisation.

The direct exposure of birds and mammals due to the intended uses of DNOC within the European Community as a desiccant on potatoes and as an insecticide on dormant fruit crop are limited.

### 5.2 Aquatic Species

#### Fish/Aquatic invertebrates

The risk evaluation of the use of DNOC in the European Community was performed taking into account application rates of 0.8 to 8.4 kg a.i./ha for orchards and 5.6 kg a.i./ha for potatoes. The exposure levels were calculated for 1 m and 5 m buffer zones respectively. The toxicity data concerning the most sensitive species in each trophic level (see point 4.2.2) were used.

The TERs were calculated for fish, daphnia and algae in acute exposure and for daphnia in chronic exposure. These TERs must be greater than the trigger values (100 for acute and 10 for chronic exposure) established in the European Community.

Almost all the acute TER values were lower than the trigger values even with a 5 metre buffer zone, namely for fish (orchards: at all application rates, potatoes), for daphnia (orchards: at high application rates, potatoes) and algae (orchards: at high application rates, potatoes). The chronic TER values were very close to the trigger value. The results are summarised in the following table.

Application rate (kg a.i./ha)	Crop	Distance (m)	Organism	Time-scale	TER	Trigger Values
8.4	Orchard	5	Fish	Acute	<b>0.8</b>	100
8.4	Orchard	5	Daphnia	Acute	<b>10</b>	100
8.4	Orchard	5	Algae	Acute	<b>11</b>	100
0.8	Orchard	5	Fish	Acute	<b>8</b>	100
0.8	Orchard	5	Daphnia	Acute	100	100
0.8	Orchard	5	Algae	Acute	110	100
5.6	Potato	1	Fish	Acute	<b>6</b>	100
5.6	Potato	1	Daphnia	Acute	<b>76</b>	100
5.6	Potato	1	Algae	Acute	<b>80</b>	100
0.8	Orchard	5	Daphnia	Chronic	<b>11</b>	10
5.6	Potato	1	Daphnia	Chronic	<b>8</b>	10

### 5.3 Honey bees and other arthropods

Bees: The risk evaluation was performed assuming an acute oral toxicity of 2 µg a.i./bee. Application rates of 0.8 and 8.4 kg a.i./ha for orchards and 5.6 kg a.i./ha for potatoes were considered for the risk evaluation. The hazard quotient (HQ = Application rate/ LD<sub>50</sub>) in all cases was much higher (400-4200) than the trigger value of 50 and this unacceptable risks thus appeared to have been identified risks that were unacceptable. However, under normal field conditions the risk to honey bees was considered to be low (see point 4.2.3). In addition the use patterns of the plant protection products containing DNOC were not considered to present any significant risk of exposure to honey bees.

Other arthropods: no data

### 5.4 Earthworms

The risk evaluation was performed in the European Community using the acute toxicity value of LC<sub>50</sub> (7 days): 17 mg a.i./kg. Only the lowest application rate of 0.8 kg a.i./ha on orchards leads to an acceptable risk to earthworms. With an application rate of 8.4 kg a.i./ha on orchards, even assuming a 50 % interception by grass, the TER value of 1.5 was lower than the trigger value set to 10.

The TER value of 2.3 obtained for an application on potatoes following a single application of 5.6 kg a.i./ha was also lower than the trigger value of 10.

Consequently, the related risks were considered unacceptable.

**5.5 Soil micro-organisms**

No reliable data were available.

**Summary**

Although there were a number of deficiencies in the DNOC data package provided to the European Community that prevented a complete evaluation being carried out, it was clear that the data package already available suggested:

- a potential for groundwater contamination,
- for all applications, a high acute risk to birds, and mammals and bees,
- for use in orchards ( with a 5 metre buffer zone), a high acute risk to fish, at all application rates, and to daphnia, algae and earthworms at high application rates,
- for use in potatoes, a high acute risk to fish, algae and earthworms,
- for use in orchards and potatoes a medium chronic risk for daphnia.

## Annex 2 – Details on final regulatory actions reported

<b>Country Name:</b>	<b>European Community</b>	
<b>1</b>	<b>Effective date(s) of entry into force of actions</b>	The measures laid down by Commission Decision 1999/164/EC of 17/02/1999 had to be put into effect by 16/08/1999 at the latest.
	<b>Reference to the regulatory document</b>	Commission Decision 1999/164/EC of 17/02/1999 concerning the non-inclusion of DNOC in Annex I to Council Directive 91/414/EEC and the withdrawal of authorisations for plant protection products containing the active substance (Official Journal of the European Communities L54 of 02/03/1999, p.21).
<b>2</b>	<b>Succinct details of the final regulatory action(s)</b>	DNOC and its salts are not included as an active ingredient in Annex I to Directive 91/414/EEC. It is therefore prohibited to place on the market or to use plant protection products containing DNOC. The authorisations for plant protection products containing DNOC had to be withdrawn by 16/8/1999. From 17/2/1999, no authorisation for plant protection products containing DNOC could be granted or renewed.
<b>3</b>	<b>Reasons for action</b>	<p>The Decision followed the review of DNOC and its salts pursuant to Article 8 (2) of the Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market. In accordance with that Directive, the Commission initiated a programme of work for the gradual examination of active substances available on the market. DNOC was one of the 90 active substances included in the list of substances covered by the first stage of the work programme. The main notifier (Elf Atochem Agri SA) submitted a dossier, which was reviewed by the Member States and the Commission within the Standing Committee on Plant Health. This review was finalised on 1 December 1998 in the form of a Commission review report for DNOC.</p> <p>From the assessments made, it was concluded that the submitted information had not demonstrated that the safety requirements laid down in Article 5(1)(a) and (b) and 5(2)(b) of Directive 91/414/EEC were met, in particular with regard to operator exposure and non-target organisms.</p>
<b>4</b>	<b>Basis for inclusion into Annex III</b>	<p>None of the intended uses were considered to present an acceptable risk as regards operator exposure. Moreover, insufficient data were available to assess consumer exposure to potential residues resulting from use.</p> <p>There were also concerns about high acute toxicity to aquatic and terrestrial organisms.</p>
<b>4.1</b>	<b>Risk evaluation</b>	It was concluded that continued use of DNOC and its salts would pose an unacceptably high risk to human health and the environment.
<b>4.2</b>	<b>Criteria used</b>	Exposure/effects ratios for occupational use, public health and the environment.

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|---|--|
| <b>Relevance to other States and Region</b> | Of special concern to developing countries due to the high risk associated with spraying of DNOC, even when rigorous Good Agricultural Practices (GAP) are employed and protective equipment is used.  |
| <b>5 Alternatives</b>                       | No alternatives are proposed.  |
| <b>6 Waste management</b>                   | Member States were allowed to grant a limited period of grace for disposal, storage, placing on the market and use of existing stocks was provided in accordance with the provisions of Article 4(6) of Directive 91/414/EEC. This period was set at not longer than a maximum of 15 months. |
| <b>7 Other</b>                              | Authorisations had already been withdrawn by a number of Member States on the basis of DNOC's similarity to other dinitro compounds with known teratogenic potential.  |

<b>Country Name:</b>	<b>Peru</b>
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|---|--|
| <b>1 Effective date(s) of entry into force of actions</b>   | 9 October 2000   |
| <b>Reference to the regulatory document</b>                 | Resolución Jefatural N° 182-2000-AG-SENASA   |
| <b>2 Succinct details of the final regulatory action(s)</b> | Prohibition of DNOC for registration, import, local formulation, distribution, trade and use; valid for formulations (including salts) as well as technical material.  |
| <b>3 Reasons for action</b>                                 | Based on a study of occupational exposure of farmers using DNOC it was concluded that the risks of continued use were greater than the benefits obtained   |
| <b>4 Basis for inclusion into Annex III</b>                 | The substantial toxicological hazards identified from existing scientific data, taken together with a study of poisoning incidents in the country, demonstrated a risk under prevailing national conditions.<br><br>DNOC is toxic to fish and to bees. In addition, it is highly phytotoxic. |

- 4.1 Risk evaluation** A study was conducted in 1991-1992 on the use of DNOC in the Valley of Maja where farmers were examined and blood samples taken, 24 hours (exceptionally 48 hours) after a day's work spraying DNOC. Local doctors recorded several complaints from the workers and showed that those spontaneously reporting complaints had higher levels of DNOC in the blood. The levels of DNOC in the blood of applicators and bystanders were significantly different. It took the body 6 to 8 weeks to eliminate DNOC.  
This study identified concern about human health.
- 4.2 Criteria used** Assessment of impact upon human health
- Relevance to other States and Region** Concerns may apply to the operators from countries with similar agricultural practices.
- 5 Alternatives** The product will be replaced with other products, with lower risk to human and the environment.
- 6 Waste management** No information
- 7 Other**

**Annex 3 – Addresses of designated national authorities****European Community**

<b>CP</b>	<b>Phone</b>	+322 299 48 60
Administrator	<b>Fax</b>	+322 295 61 17
European Commission	<b>Telex</b>	
DG Environment	<b>e-mail</b>	klaus.berend@cec.eu.int
Rue de la Loi, 200		
B-1049, Brussels – Belgium		
<i>Mr Klaus BEREND</i>		

**PERU**

<b>P</b>	<b>Phone</b>	+511 433 8048
Directora General de Sanidad Vegetal	<b>Fax</b>	+511 433 8048
Servicio Nacional de Sanidad Agraria (SENASA)	<b>Telex</b>	
Dirección General de Sanidad Vegetal	<b>e-mail</b>	adelarosa@senasa.minag.gob.pe
Pasaje Zela S/N, Edificio del Ministerio de Trabajo,		
Piso 10, Lima 11 – PERU		
<i>Ing. Alicia De La ROSA BRACHOWICZ</i>		

<b>C</b>	<b>Phone</b>	+511 440 2340/440 0399
Director General	<b>Fax</b>	+511 440 6562
Dirección General de Salud Ambiental	<b>Telex</b>	
Ministerio de Salud	<b>e-mail</b>	
Las Amapolas 350		
Lince		
Lima –PERU		
<i>Mr. Jorge Villena Chavez</i>		

**C** Industrial and consumer product chemicals  
**CP** Pesticides, industrial and consumer product chemicals  
**P** Pesticides,

## Annex 4 – References

### ◆ PART I: FINAL REGULATORY CONTROL ACTION

#### European Communities

Commission Decision 1999/164/EC of 17/02/1999 concerning the non-inclusion of DNOC in Annex I to Council Directive 91/414/EEC and the withdrawal of authorisations for plant protection products containing the active substance (Official Journal of the European Community L54 of 02/03/1999, p.21) (available at: [http://europa.eu.int/eur-lex/pri/en/oj/dat/1999/l\\_054/l\\_05419990302en00210022.pdf](http://europa.eu.int/eur-lex/pri/en/oj/dat/1999/l_054/l_05419990302en00210022.pdf))

#### Peru

Resolución Jefatural N° 182-2000-AG-SENASA

### ◆ Part II: Documentation used for risk evaluation

**Review report** for the active substance DNOC – Finalised to support European Commission decision concerning the non-inclusion of DNOC as active substance in the Annex I to the Directive 91/414/EEC and the withdrawal of authorisations for plant protection products containing this active substance. European Commission – Directorate General for Agriculture DG VI-B.II-1 (7777/VI/98-REV.3, 1.12.1998).

**EU Peer review Programme (ECCO)** – Full report on DNOC Pesticides Safety Directorate/ECCO Team 5528/ECCO/PSD/97 25.7.97, plus supporting background papers.

Guidance for the setting of **Acceptable Operator Exposure Levels (AOELs)**. Commission of the European Communities. Directorate-General for Health and Consumer Protection (7531/VI/95 rev 6, 10.09.2001).

Guidance document on Risk assessment for **Birds and Mammals** under Council Directive 91/414/EEC. European Commission –Directorate-General for Health and Consumer Protection (SANCO/4145/2000, Nov.2001).

Guidance document on **Aquatic Ecotoxicology** within the framework of Directive 91/414/EEC. European Commission –Directorate-General for Health and Consumer Protection (SANCO/3268/2001, Rev. 8, 26.06.2001).

Guidance document on **Terrestrial Ecotoxicology**. European Commission – Directorate-General for Agriculture (2021/VI/98 rev. 7, 08.07.2000).

Guidance document on **Persistence in Soil**. European Commission – Directorate-General for Agriculture (9188/VI/97 rev. 8, 12.07.2000).

**Technical Report No. 2001-AG-SENASA-DGSV-DIA**, dated 20 September 2001

**Report** of project on occupational health and rural education (Lima, Peru, 1992, excerpt – table of content and section relevant to DNOC).

**FAO/WHO, 1963**. Pesticide Residues in Food – 1963 - FAO Meeting Report No. PL/1963/13 (mimeographed); WHO/Food Add./23/1964.

**FAO/WHO, 1965.** Pesticide Residues in Food – 1965 - Evaluations of the toxicity of pesticide residues in food. Toxicological and environmental Joint Meeting on Pesticide Residues (JMPR); Report of the second joint meeting of the FAO Committee on Pesticides in Agriculture and the WHO Expert Committee on Pesticide Residues, WHO Geneva WHO/Food Add./27.65, FAO meeting report No. PL/1965/10 (available at: <http://www.inchem.org/document/jmpr/jmprmono/v065pr22.htm>).

**IPCS, 2000.** Health and Safety Guide No.220: Dinitro-o-cresol. International Programme on Chemical Safety, IPCS/ World Health Organization, Geneva. (available at: [http://www.inchem.org/documents/ehc/ehc/ehc220.htm#\\_Toc478363972](http://www.inchem.org/documents/ehc/ehc/ehc220.htm#_Toc478363972))

**Tomlin, Clive 2000.** The Pesticide Manual: A World Compendium (12th ed.), British Crop Protection Council, United Kingdom

**WHO, 1996.** Recommended classification of pesticides by hazard and guidelines to classification 1996-1997. WHO/PCS/96.3. World Health Organization, IPCS, Geneva.

**WHO, 1998.** Recommended classification of pesticides by hazard and guidelines to classification 1998-1999. WHO/PCS/98.21/Rev.1

**WHO, 2000.** Recommended classification of pesticides by hazard and guidelines to classification 2000-01. WHO/PCS/01.5. World Health Organization, IPCS, Geneva.

◆ **Part III: Relevant guidelines and reference documents**

**Basel Convention** on the Control of Transboundary Movements of Hazardous Wastes and their Disposal 1996.

**FAO, 1990.** Guidelines for personal protection when working with pesticides in tropical countries. FAO, Rome.

**FAO, 1995.** Revised guidelines on good labelling practices for pesticides. FAO, Rome.

**FAO, 1995.** Guidelines on Prevention of Accumulation of Obsolete Pesticide Stocks. FAO, Rome.

**FAO, 1996.** Technical guidelines on disposal of bulk quantities of obsolete pesticides in developing countries. FAO, Rome.

**FAO, 1996.** Pesticide Storage and Stock Control Manual. FAO, Rome.

**FAO, 1999.** Guidelines for the management of small quantities of unwanted and obsolete pesticides, FAO, Rome.