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**Rotterdam Convention on the Prior Informed
Consent Procedure for Certain Hazardous
Chemicals and Pesticides in International Trade
Chemical Review Committee**

Fourth meeting

Geneva, 10–13 March 2008

Item 5 (b) (i) of the provisional agenda*

**Inclusion of chemicals in Annex III of the Rotterdam
Convention: review of notifications of final regulatory
action to ban or severely restricted a chemical:alachlor**

Alachlor: rationale for the Committee's conclusion that Canada's notification met the requirements of the Convention

Note by the Secretariat

1. The documentation provided by Canada in support of its final regulatory action on alachlor was circulated for consideration at the second meeting of the Chemical Review Committee in document UNEP/FAO/RC/CRC.2/10/Add.1.
2. The annex to the present note contains the rationale for the Committee's conclusion that the notification met the criteria set forth in Annex I and Annex II to the Rotterdam Convention.

* UNEP/FAO/RC/CRC.4/1

Annex

Rationale for the conclusion that the notification for alachlor (CAS No. 15972-60-8) from Canada meets the criteria set forth in Annex I and Annex II of the Rotterdam Convention

1. In reviewing the notification of final regulatory action by Canada, together with the supporting documentary information provided by the Party, the Committee at its second meeting confirmed that the action had been taken in order to protect human health. The notification and supporting documentation identified alachlor as an animal carcinogen and a probable human carcinogen.
 2. Alachlor was used in Canada as a herbicide for control of annual grasses and broadleaf weeds in corn and soybeans. Exposure occurs to workers during application of pesticides containing alachlor.
 3. The Committee established that the final regulatory action had been taken on the basis of a risk evaluation and that the evaluation 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 action had been based on chemical-specific risk evaluations, taking into account the conditions of exposure within Canada.
 4. The risk evaluation included an assessment of the hazard (carcinogenicity) and the exposure (primarily occupational exposure, namely, exposure of applicators), and therefore meets the criteria for a risk evaluation.
 5. The Committee concluded that the final regulatory action taken by Canada on the basis of the available supporting documentation provided a sufficiently broad basis to merit including alachlor in Annex III of the Rotterdam Convention in the pesticide category. It noted that the action had led to a decrease in the quantities of the chemicals used in the notifying Party. All uses had been banned in Canada and therefore continued exposure did not occur there. The risk to human health in the notifying Party had therefore been significantly reduced.
 6. There was no indication that there were any industrial uses of alachlor in Canada. The Committee also noted that the considerations underlying the final regulatory action were not of limited applicability since all uses had been banned. On the basis of information provided to the members at the second meeting of the Chemical Review Committee and other available information, the Committee concluded also that there was evidence of current international trade in alachlor.
 7. The Committee noted that the final regulatory action was not based on concerns about intentional misuse of alachlor.
 8. The Committee noted that the regulatory decision had been reviewed by an independent board that had concluded that the risk to applicators was overstated. The Minister of Agriculture had considered the recommendations and upheld the regulatory action.
 9. The Committee also noted that the regulatory decision had been taken in 1985 and that recent interpretations of data related to classification of carcinogens had not been available at the time that the regulatory decisions had been taken.
 10. The Committee concluded at its second meeting that the notification of final regulatory action by Canada met the information requirements of Annex I and the criteria set out in Annex II to the Convention.
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