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INTERIM CHEMICAL REVIEW COMMITTEE

Third session

Geneva, 18 – 22 February 2002

Item 6 (b) on the provisional agenda *

**INCLUSION OF CHEMICALS IN THE INTERIM PRIOR INFORMED CONSENT PROCEDURE
- REVIEW OF PROPOSALS FOR SEVERELY HAZARDOUS PESTICIDE FORMULATIONS**

GRANOX TBC and SPINOX T

Note by the Secretariat

1. Further to the information provided by the Secretariat in document UNEP/FAO/PIC/ICRC.3/17.Add.1, the Secretariat would like to provide for your kind information those comments and information that have been received between 7 and 14 January 2002.

* UNEP/FAO/PIC/ICRC3/1

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ANNEX I– Countries where the designated national authority responded to the request for information on the formulations Granox T.B.C. and Spinox T

As of 14 January 2002, the designated national authorities in the following countries had replied to the request for information of 25 October 2001 (in bold: countries whose reply has been received between 7 January and 14 January 2002).

Country/Organisation	Date received
Bhutan	18 December 2001
Canada	9 January 2002
Chile	10 January 2002
People's Republic of China	19 December 2001
Colombia	26 November 2001 and 11 December 2001
Costa Rica	3 December 2001
Czech Republic	17 December 2001
Estonia	26 November 2001
Finland	6 December 2001
Israel	27 December 2001
RDA Republic of Korea	17 December 2001
Latvia	25 November 2001
Lesotho	18 December 2001
Malaysia	9 January 2002
Mexico	20 December 2001
New Zealand	11 December 2001
Tanzania	10 January 2002
Turkey	17 December 2001
Vietnam	9 January 2002
Zimbabwe	8 December 2001
European Union	18 December 2001

A copy of the correspondence and attachments submitted to the Secretariat has been sent to the chair of the inter-sessional task group on these two formulations and is available from the Secretariat on request. A complete set of this correspondence will be available at the third session of the Committee in February 2002.

ANNEX II



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January 9, 2002

Interim Secretariat for the Rotterdam Convention
 Plant Protection Service
 Plant Production and Protection Service
 FAO
 Viale delle Terme di Caracalla
 00100 Rome, Italy

Gentlemen;

Subject: Senegal Notification for Granox TBC and Spinox T

On behalf of CropLife International I am pleased to provide the Interim Secretariat with the industry response to a request for information relating to the Senegal notification on a severely hazardous pesticide formulation and in accordance with Annex III Part 2 of the Rotterdam Convention. CropLife International and its member organizations support the Rotterdam Convention. We believe that sound regulation of pesticides should be science-based, balanced and fair and serve the intended purpose of informing countries of hazards in other countries that are relevant to their own situations. We are providing comments, herewith, in that spirit as the ICRC embarks on the consideration of the first notification for a severely hazardous pesticide formulation.

The comments were generated by a task group of four basic manufacturers of the three active ingredients contained in the subject formulations: Dupont for benomyl, FMC Corp. for carbofuran, and Uniroyal/Crompton Corp. and UCB Group for thiram. Some of the information presented was gleaned from personal communications with Senchim and S.P.I.A., the local distributors of the subject three-way mixture.

None of the basic manufacturers in the task group formulate or sell the subject three-way formulation anywhere in the world and are unaware of sales of the subject formulation or any formulation variants outside of Senegal. The ICRC may wish to take the absence of international trade into consideration, even though evidence of international trade is not a criterion for listing a severely hazardous pesticide formulation.

Given that the task group did not have firsthand knowledge of the incidences, it decided to undertake an indirect approach to understanding the relationship between the twenty-two reported incidents that were available and the subject formulation. It conducted an evaluation of the incident report forms from a scientific standpoint to understand how well the reported incidents matched the known modes of action and toxicological properties of the individual active ingredients. We encourage the ICRC to include this information in its deliberations.

It is clear from the incident reports that fatalities and intoxications occurred in men involved in the equivalent of a short-term occupational use. The conditions of use would be expected to result in an acute exposure and a rapid onset of symptoms. Based on animal testing and the experience of years of use in the field, symptoms of poisoning associated with the three individual active ingredients are known to occur within minutes or hours of exposure. However, only one reported incident occurred in this timeframe. More than 90 % of the symptoms occurred after 2 months. Therefore, the observed symptoms did not correlate with the exposures. Furthermore, all three active ingredients are rapidly excreted from the body so a cumulative effect of exposure cannot explain the delay in onset of symptoms. We note that the Rotterdam Convention defines a severely hazardous pesticide formulation as a "severe health effect...observable within a short period of time." Because adverse health effects were not observed shortly after exposure we encourage the ICRC to consider whether the reported incidences qualify under this definition.

According to the incident reports the most prevalent symptoms of alleged exposure to the subject formulation were chest pain (91%), dyspnea (82%) and oedema (73%). Based on a review of symptoms described in Material Safety Data Sheets, one would not expect to observe this combination of symptoms from exposure to the subject three-way mixture. All other reported symptoms occurred in less than 36% of the affected individuals and in most instances less than 10% of the cases. Because the conditions of use and duration of exposure were so similar among the subjects, this suggests the absence of a correlation between symptoms and exposure to a common toxicant.

The three active ingredients of the subject formulation share a carbamate moiety, but belong to different pesticide classes and have different mechanisms of toxicity. Benomyl interferes with cell division, carbofuran interacts with acetyl cholinesterase, and thiram interferes with cellular energy transfer. . Therefore, one would not expect exposure to all three active ingredients to be additive in their acute effects.

The Senegal notification makes clear that the product was misused and identifies the inability to read the product label as the underlying cause. There was also disregard for the pictogram of the skull and crossbones, the universal symbol for a dangerous product. Under the circumstances the proposed educational measures and monitoring by Senegal are appropriate and laudable and recognize that product can be used safely according to label. We would also recommend the use of pictograms on the label in accordance with the FAO Code of Conduct.

CropLife International is grateful for the opportunity to provide its views on the Senegal notification and is prepared to assist the ICRC with additional information as may be available.

Sincerely,

Michael A. Morelli, Ph.D,
 Chair, PIC Project Team
 CropLife International

cc: C. Verschueren - CropLife International
 M Laget – UCB Group
 P Pritchard – Uniroyal/Crompton Corp
 L Hershberger – Dupont Crop Protection
 J Becker – FMC Corp
 C Barnes – US EPA

ANNEX III

**Rapport de l'Investigation de l'Epidemie d'une Maladie d'Etiologie Inconnue a Kolda
December 2000**

*Dr. Eugenia Gomes do Espirito Santo, SNGE; Dr. Laurence Marrama, IPD; Dr. Kader Ndiaye IPD;
Dr. Malan Coly, OMS; Dr. Dior Diagne, ISED; Dr. Pape Ndour, ISED; Dr Ousseynou Ba.*

SNGE - Service Nataional des Grandes Endemies

IPD - Institut Pasteur de Dakar

OMS - Organisation Mondiale de la Sante

ISED - Institut de Sante st de Developpement

Region Medicale de Kolda, Service Regional des Grandes Endemies

Note by the Secretariat

The document is only available as a hard copy in French. However in view of the importance of his information to the work of the intersessional Task Group headed by M. Ammati we have made it available to the intersessional Task Group in its present form in order that it might be reflected in their presentation to the full Committee during the third session of the ICRC.

We are in the process of having the document translated and will have an English version posted on the Rotterdam Convention site and available to all members of the Committee by the meeting in February. If in the meantime you wish to see a copy of the document in French please let us know and we will send one to you, or you can download it from the Internet at www.pic.int at the page containing the documents relevant to ICRC3.