



United Nations
Environment Programme

Food and Agriculture Organization
of the United Nations

Distr.
GENERAL

UNEP/FAO/PIC/ICRC.4/4
10 January 2003

ENGLISH ONLY

Interim Chemical Review Committee

Fourth session

Rome, 3 – 7 March 2003

Item 4 (a) of the provisional agenda*

**OPERATIONAL PROCEDURES FOR THE INTERIM CHEMICAL REVIEW COMMITTEE:
STATUS OF THE WORK OF THE TASK GROUPS ESTABLISHED AT
THE THIRD SESSION OF THE COMMITTEE**

**TASK GROUP 1 : DEVELOPMENT OF AN ENVIRONMENTAL INCIDENT REPORT FORM
FOR SEVERELY HAZARDOUS PESTICIDE FORMULATIONS**

Note by the secretariat

1. At its third session, the Interim Chemical Review Committee established a task group to work intersessionally. The task group was requested to finalize the draft environmental incident report form and associated guidance for severely hazardous pesticide formulations, in line with article 6 and part 1 of annex IV, and release this draft form for pilot testing. The Task Group was requested to consider and define the interpretation of the concept of “use”.
2. Annexed to the present note is the report of the task group, as prepared by the Secretariat. The report provides brief background information on the objectives and composition of the task group and information on how its work was organized. Finally, in sections E and F, respectively, the report identifies issues for consideration by the Interim Chemical Review Committee and provides specific recommendations on how the Committee might proceed. Appendices 1, 2 and 3 of the report contain the introduction to the form, the draft environmental incident report form and a tabular summary of the comments received during the pilot testing, respectively. A full set of comments provided will be available at the meeting.

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

Annex

TASK GROUP 1: DEVELOPMENT OF AN ENVIRONMENTAL INCIDENT REPORT FORM
FOR SEVERELY HAZARDOUS PESTICIDE FORMULATIONS

A. Objective of the task group

1. The objective of the task group, established at the third session of the Interim Chemical Review Committee, was to revise and finalize a draft Environmental Incident Report Form and release it for pilot testing.

B. Composition of the task group

2. The members of the Task Group, assigned at the third session of the Interim Chemical Review Committee, were:

André Mayne (coordinator)
Azhari Omer Abdelbagi
Dudley Achu Sama
Flor de María Perla de Alfaro
Cathleen Barnes
William Cable
Mohamed El Zarka
Sandra de Souza Hacon
Julio Monreal Urrutia
Kasumbogo Untung
Beverley Wood
Secretariat

Observers: Achim Holzmann (Germany)
Barbara Dinham (Pesticide Action Network UK)
Rainer Heusel (CropLife International)

C. Background

3. The Rotterdam Convention, through its article 6, provides a mechanism for any party that is a developing country or a country with an economy in transition and is experiencing problems caused by a severely hazardous pesticide formulation under conditions of use in its territory, to propose to the secretariat the listing of that formulation in Annex III of the Convention. The proposal is to contain the information required by part 1 of Annex IV.

4. Article 6, paragraphs 2 and 3, requires that the Secretariat, when it has received a proposal that it has verified meets the requirements of part 1 of annex IV, forwards a summary of the proposal to all Parties and collects the additional information set out in part 2 of annex IV regarding the proposal. The Interim Chemical Review Committee is to review the information provided in the proposal and the additional information collected and, in accordance with the criteria set out in part 3 of annex IV, recommend to the Intergovernmental Negotiating Committee whether or not the severely hazardous pesticide formulation in question should be made subject to the interim PIC procedure.

5. The submitted proposals and additional information collected by the Secretariat are the main documents upon which the Committee will base its work on severely hazardous pesticide formulations. It is thus of importance to the Committee that the information collected in accordance with parts 1 and 2 of Annex IV is of a satisfactory quality and relevant to their review of the criteria in part 3 of Annex IV of the Convention.

6. A task group, established at the second session of the Committee, developed in intersessional work a draft environmental incident report form for severely hazardous pesticide formulations. The draft form was circulated twice to task group members. The Task Group presented its report, containing the draft environmental incident report form, to the third session of the Committee in document UNEP/FAO/PIC/ICRC.3/7. The Committee, at its third session, authorized the Task Group to hold further intersessional consultations, produce an updated draft and circulate it for pilot testing.

D. Organization of work

7. A letter from the Chair of the drafting group containing the revised draft Environmental Incident Report Form, as discussed at the third session of the Committee, was circulated to task group members on 29 April 2002. Also attached was a compilation of comments received since the third session of the Committee which were incorporated into the draft form and guidance document.

8. Comments received were considered by the Chair of the Task Group and served as the basis for revising the draft Environmental Incident Report Form and associated introduction. The task group had given consideration to the proposed introduction that should accompany the environmental incident report form.

9. A compilation of the comments received, the revised form and the introduction were circulated to task group members on 6 June 2002 for information.

10. The Secretariat launched the pilot testing on 30 July 2002. The Environmental Incident Report Forms (English, French and Spanish versions) together with the introduction and a cover note were sent to sixteen field experts. The documents were also sent to task group members in order to keep them informed on the progress in pilot testing and to provide them with a further opportunity to provide input to the document.

11. During the pilot test phase comments were received from four field experts and two task group members. A tabular summary of these comments is available as Appendix 3 in this report.

12. During the pilot testing some specific comments were provided which addressed the content of the form as well as the content of the introduction to the form. Those comments are addressed in detail in Section E of this report.

13. Comments of more editorial nature were directly incorporated by the Secretariat into the Environmental Incident Report Form and its introduction.

14. The task group has not had the opportunity to review and comment on the revisions made by the Secretariat. The revised Environmental Incident Report Form and the comments received during the pilot testing were not circulated to the members of the Task Group.

15. The revised Environmental Incident Report Form, the introduction, and a tabular summary of comments received during the pilot test phase are provided as Appendix 1, 2 and 3, respectively.

E. Issues to consider

16. To facilitate discussion by the Committee the following comments and issues are submitted for consideration:

(a) Guidance document: One of the objectives of the task group was to draft a form that was simple enough that it could be used widely at the field level. To facilitate the implementation of the form, the Committee might consider developing a more detailed guidance document. Such a

guidance document could contain, among others, a worked example of a completed form to demonstrate how the Environmental Incident Report Form might be completed and the types of responses expected.

(b) Scope of the Environmental Incident Report Form: In order to clearly describe the scope of the Environmental Incident Report Form and to make more easily understandable to the end user of the form, the task group has identified some representative examples and included them in the introduction to the form. These few examples are not intended to limit the scope of the form. In providing some examples focus was given on cases which are more likely to happen and can be reported by field staff. It was thought that the following examples might be beyond the scope of this form: disturbance of ecological key processes, e.g. breakdown of organic matter, microbial nitrogen fixation, etc, or secondary poisoning of non-target organisms, or effects of run-off of rains from pesticide treated land.

(c) Merging human health and Environmental Incident Report Form: At its third session, the committee had some discussion regarding the relation of the Environmental Incident Report Form to the human health incident report form. The Environmental Incident Report Form was developed on the basis of the human health incident report form. Part A (“Transmittal Form – Designated National Authority”) of both forms is identical. The task group considered the issue of appending the Environmental Incident Report Form as a third Section (Part C) to the already finalized human health incident report form (Parts A and B). This might result in a form which would be too complex and difficult to handle.

(d) Format of the form and sequence of questions: The format of the form is in a stage believed to be close to completion. As a result of the pilot testing, some of the questions were re-ordered with the aim to have them in an order which facilitates the provision of the information by the end user. One field expert provided extensive comments mainly dealing with organisation of the questions and formatting.

(e) Content of the form: The form should ensure that an adequate level of detail of information on the environmental incident is provided, in order to meet the needs of the Interim Chemical Review Committee. The comments received during the pilot test suggested several amendments:

- i) No further comments were provided during the pilot testing on Part A of the form. The content of Part A is therefore identical with the requirements provided in part 1 of annex IV of the Rotterdam Convention.
- ii) The Environmental Incident Report Form requires a clear description of the formulation used, and a clear distinction in case more than one formulation was used at the same time. This consideration led to the inclusion of a new Section (I) dealing with the number of formulations used, and requiring the end user to eventually complete Sections II and III for every individual formulation used at the same time;
- iii) In the case of environmental incidents, the time (period) and place (space) of application of the pesticide formulation might differ significantly from the time or place where the effects were observed in the environment. Therefore, a Section III was introduced. Section III requests a description of the treatment – how the formulation was used and where and when it was applied. The relevance of Section III must be seen in relation to Section IV - description of the incident. Section IV focuses on a description of the location where the effects on the environment were observed.
- iv) A number of other proposals were made, such as: request for more details concerning the individual application rate in case of multiple applications; or a request for analytical data

on residues in soil, water or biological tissues. The Committee might consider whether such details are required.

(f) The result of the pilot test phase is very limited. It might not provide a sufficiently broad basis to fully conclude on the development of the content of the Environmental Incident Report Form. The Committee might therefore consider whether more experience regarding the usefulness of the form be obtained through another round of pilot testing, or whether such experience best be gained through the release of the form.

F. Recommendation to the Interim Chemical Review Committee

17. The Committee might wish to consider:

(a) Reviewing the outcome of the work of the task group, in particular whether the form developed would provide the information required under Article 6 and Annex IV, part I, of the Convention;

(b) Reviewing the outcome of the pilot-testing at the field level, in particular whether a further round of validation of the draft environmental incident report form and guidance document through pilot-testing at the field level is required;

(c) to approve the draft Environmental Incident Report Form and introductory document;

(d) to develop a guidance document containing a worked example;

18. Possible outcomes of the discussion could be:

(a) Adoption of the Environmental Incident Report Form (introduction, Part A and Part B);

(b) Establishment of a work plan for release of the form;

(c) Assigning of the task of developing a guidance document;

Appendix 1 – Introductory document

<p>Introduction to the Severely Hazardous Pesticide Formulation Report Form - Environmental Incidents -</p>
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The severely hazardous pesticide formulation report form consists of three sections:

Introduction, the text is intended to provide relevant background information on the Rotterdam Convention and how the information collected by the form and submitted by the Designated National Authority will be used.

Part A is to be completed by the Designated National Authority once he/she receives Part B from the field. It reflects the information requirements of part 1 of Annex IV of the Convention. There is some redundancy between Parts A and B of the form particularly with respect to information on product identity. It was thought that this redundancy might help countries to consolidate responses by using Part A of the form to report on more than one incidents for the same formulation.

Part B can be completed by any competent person. It is designed to provide “*a clear description of the incidents related to the problem, including the adverse effects and the way in which the formulation was used*” (part 1 paragraph g of Annex IV of the Convention). The form has been constructed around these points. It consists of a series of closed questions or checklist that captures the basic information needed with options for including additional information where it is available.

SEVERELY HAZARDOUS PESTICIDE FORMULATION REPORT FORM - ENVIRONMENTAL INCIDENTS

INTRODUCTION

Purpose of this form

The Severely Hazardous Pesticide Formulation (SHPF) Report Form - Environmental Incident Report Form - was developed to facilitate the identification of candidate formulations with environmental concerns for inclusion in the Rotterdam Convention. A similar form was developed for reporting health incidents. The Convention provides a mechanism for countries to decide whether or not they wish to receive future shipments of such pesticide formulations and for ensuring compliance with these decisions by exporting countries.

What is the Rotterdam Convention?

The Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade promotes a shared responsibility between importing and exporting parties in the international trade of certain hazardous chemicals. It gives importing countries the power to decide which chemicals they want to receive and to exclude those they cannot manage safely. The Convention includes provisions for developing countries and countries with economy in transition, that are experiencing health or environmental problems with severely hazardous pesticide formulations under conditions of use, to identify such formulations as candidates for inclusion in the Convention. Further information on the operation of the Rotterdam Convention may be found at www.pic.int.

What is the severely hazardous pesticide formulation report form?

The form consists of two parts: – the Transmittal Form (Part A) – is to be used by the Designated National Authority (DNA) to transmit the Environmental Incident Report Form (Part B – EIRF) to the Secretariat. The Environmental Incident Report Form has been developed to meet the information requirements of the Convention, that is a clear description of the environmental incidents related to the use of a severely hazardous pesticide formulation, including the adverse effects and the way in which the formulation was used. Part B of the form consists of a series of closed questions or checklist that captures the basic information needed with options for including additional information where it is available. Although programmes for collecting quantitative information on environmental incidents of pesticides may not be implemented in many countries, use of such national programmes for reporting environmental incidents should be made, where they exist. The format has been developed so that it might be widely used by States, aid agencies, intergovernmental organizations and non-governmental organizations etc., in reporting on environmental incidents related to the use of severely hazardous pesticide formulations. If there are other formats available, they may be used in preparing a submission to the Secretariat and forwarded through the DNA using Part A of the SHPF form provided that they meet the information requirements of Parts 1 and 3 of Annex IV of the Convention. There is some redundancy between Parts A and B of this form. It was thought that this might help countries to consolidate responses by using Part A of the form to report on more than one incident for the same formulation.

What is an environmental incident?

For the purposes of this incident report form, an environmental incident is defined as the contamination of land, water and/or air by a severely hazardous pesticide formulation (SHPF) causing the temporary or permanent impairment or mortality of non-target organisms or biological processes under the “conditions of use” in developing countries or countries with economies in transition (Article 6). In this instance, “conditions of use” does not include accidental spills/leaks, nor deliberate misuse of an SHPF, and is clearly limited to effects caused by a certain formulation of a substance. The following are some examples of potential incidents:

- the poisoning of birds or other wildlife that ingest granular insecticides used for soil treatment. Such incidents may result from the application method (eg. broadcast application rather than injection into the soil) or from the behaviour of non-target organisms (eg. scavenging of granules).
- the poisoning of aquatic organisms due to the contamination of a stream or pond. Such incidents may occur if sufficient buffer zones between treated areas and waterways were not observed.
- the severe disturbance of non-target populations (e.g. honey bees, earthworms, beneficial insects)

What happens to the completed form?

Once Part B - Environmental Incident Report Form - has been completed to the extent possible based on the information available, it should be forwarded to the DNA. The DNA is to coordinate the completion of Part A - Transmittal form - and forward the entire document to the Secretariat. The Secretariat is required to collect additional information including physico-chemical and ecotoxicological properties of the pesticide formulation, information on environmental incidents related to the formulation in other States, and the existence of environmental restrictions or environmental guidelines in other states, or relevant evaluations, where available. This information along with the completed form is reviewed by the Interim Chemical Review Committee (ICRC). The ICRC will decide whether or not to recommend the inclusion of the pesticide formulation in the Rotterdam Convention.

Your co-operation in completing this form and your contribution for the identification of severely hazardous pesticide formulations posing environmental problems under conditions of use is greatly appreciated. If you have any questions or comments relating to the completion of this form please contact the Secretariat at the address below.

<p>Interim Secretariat for the Rotterdam Convention Plant Protection Service Plant Production and Protection Division, FAO Viale delle Terme di Caracalla 00100 Rome, Italy Tel: (+39 06) 5705 3441 Fax: (+39 06) 5705 3224 E-mail: pic@fao.org</p>	<p>Interim Secretariat for the Rotterdam Convention UNEP Chemicals 11-13, Chemin des Anémones CH – 1219 Châtelaine, Geneva, Switzerland Tel: (+41 22) 917 8183 Fax: (+41 22) 797 3460 E-mail: pic@unep.ch</p>
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Appendix 2 - Severely Hazardous Pesticide Formulation Report Form

PART A - TRANSMITTAL FORM - DESIGNATED NATIONAL AUTHORITY

Information required from a Designated National Authority	
1	Name(s) of the formulation(s):
2	Type(s) of formulation(s): (<i>for example EC, WP, DP</i>)
3	Trade name(s) and name(s) of producer, if available :.....
4	Name(s) of the active ingredient(s) in the formulation(s):
5	Relative amount of each active ingredient in the formulation(s):(% Concentration)
6	Attach copy of the label, and instructions for use, if available (or describe the key aspects of the label: language, etc.).
7	Common and recognized patterns of use of the formulation within the country – <ul style="list-style-type: none"> ➤ the formulation is registered / permitted for use in the country? ➤ what uses are permitted? ➤ are there any handling or applicator restrictions specified as a condition of registration; ➤ information on the extent of use of the formulation, such as the number of registrations or production or sales quantity (indicate the source of information); ➤ other information on how the formulation is commonly/typically used in the country <p><i>(this information should be submitted on a separate sheet attached to the completed form)</i></p>
8	A clear description of incidents(s) related to the problem, including adverse effects and the way in which the formulation was used (for example <i>Part B pesticide incident report form identifies key elements and appropriate level of detail</i>). Other report formats which may exist at the national level may also be used, provided they contain comparable information.
9	Any regulatory, administrative or other measure taken, or intended to be taken, by the proposing Party in response to such incidents.

Date, signature of DNA and official seal:

PLEASE RETURN THE COMPLETED FORM TO:

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

OR

**Interim Secretariat for the Rotterdam Convention
UNEP Chemicals**

11-13, Chemin des Anémones
CH – 1219 Châtelaine, Geneva, Switzerland

Tel: (+39 06) 5705 3441
Fax: (+39 06) 5705 3224
E-mail: pic@fao.org

Tel: (+41 22) 917 8183
Fax: (+41 22) 797 3460
E-mail: pic@unep.ch

Severely Hazardous Pesticide Formulation Report Form

PART B – ENVIRONMENTAL INCIDENT REPORT FORM

Note: several forms may have to be completed if a single incident is associated with the use of more than one formulation at the same time. In such a case, sections II and III of part B may have to be filled several times, with a clear indication to which pesticide formulation it relates. Therefore, please enter a specific number and the date of this incident report in the upper right corner. These entries should be the same on all sheets of this report.

(I) Number of formulations used

1. How many formulations were used when the incident took place (tick or fill in number and proceed as indicated)?

One formulation was used: Complete sections II and III once only.

_____ different formulations were used at the same time (eg. tank mix of a herbicide and a fungicide; similar formulations of different origin): Complete section II and appropriate parts of section III for each formulation on separate sheets. Make sure that all sheets have the same number and date.

2. If different formulations were used, please describe how they were prepared:

(II) Product identity: What formulation was used when the incident took place? If more than one formulation was used at the same time (eg. tank mix), please complete this section II and appropriate parts of section III for each formulation on separate sheets for each formulation used, and attach all forms to Part A – Transmittal Form – Designated National Authority.

3. Name of the formulation (chemical name):

4. Type of formulation _____ (use commonly used formulation codes)

5. Name and relative amount of each active ingredient (a.i.) in the formulation (eg. % concentration, g a.i./L or g a.i./kg):

6. Trade name, and names of the producer/manufacturer, if available:

7. Attach copy of the label, and instructions for use, if available (or describe the key aspects of the label: language, etc.).

8. Intended use:

- Insecticide Herbicide Tick control Rodenticide
 Fungicide Unknown Other (specify) _____

9. Are there any use restrictions or prohibitions (domestic or regional) regarding the use of this formulation or the active ingredient?

- No
 Yes, specify: _____

10. Was the formulation changed in any way or was it used as purchased?

- Used as purchased Changed, specify how:

11. Was the pesticide product or formulation in its original container?

- Yes (go to 12.) No (Continue below)

Did the repacked container have a copy of the label attached?

- Yes No

(III) Description of the treatment: How was the formulation used?

12. Location of the area treated: Village/city:

Province/state/region/district:

Country:

13. Date and number of pesticide applications:

a) Approximately what were the dates (if known) of the beginning and end of the pesticide release into the environment?

Beginning: _____ End: _____

b) Was the pesticide release from a single or multiple application?

- Single application
 Multiple application
Number of applications: _____
Approximate date of each application: _____

14. Treated (target) area and target pest

a) What type of crop or landscape was treated (eg. maize, grassland, forest, pond)?

- b) What was the target pest (eg. weeds in maize, locusts in grassland, gypsy moth in forests, mosquitoes in ponds)?

15. Pesticide preparation and application rate:

- a) Was the manufactured formulation (as specified in Section II, 3–7) mixed with a carrier or diluent (eg. liquid, powder, bran) before treatment? How was the pesticide mixture prepared (eg. mixed with water, diesel), and what was the mixing ratio: ___ (L or kg) of formulation per ___ (L or kg) of carrier/diluent? Please describe any other details or additional information relating to the preparation of mixtures:

- b) What was the application rate (tick appropriate unit)?
_____ g a.i./ha L/ha kg/ha

- c) What was the total amount and active ingredient (a.i.) concentration of the actual formulation released into the environment (circle appropriate unit)? (For multiple applications, please provide the total amount released.)

Total amount: _____ (L or kg) Concentration: _____ (g a.i./L or g a.i./kg)

16. Conduct of application

- a) How was the pesticide applied (method of application)?

By hand Hand-held sprayer Backpack sprayer
 Tractor-mounted sprayer Aircraft In-furrow applic.
 Other method (please specify) _____

- b) What were the weather conditions at the time of release?

Temperature: _____ °C or °F, Wind speed: _____ km/hr or mph, Direction: _____
Rain: _____ mm or inches, Sunny or cloudy: _____
General description of conditions: _____

- c) What were the weather conditions for the few days after release?

Temperature: _____ °C or °F, Wind speed: _____ km/hr or mph, Direction: _____
Rain: _____ mm or inches, Sunny or cloudy: _____
General description of conditions: _____

17. Please provide any relevant information regarding the applicator of the pesticide formulation (eg. level of training, literacy):

(IV) Description of the incident:

18. When was the incident first noticed? Please give the date if known.

19. Location of the incident:

Please indicate where the incident occurred (be as specific as possible). Was the location of the incident identical with the location of the area treated?

- Yes (as specified in Section III 12)
- No (please specify) Geographical coordinates, if available
Village/city:

Province/state/region/district:

Country:

Please indicate approximately how large the area affected was by completing all areas of the following table that apply: (for aquatic environments, circle fresh water (FW) or saltwater (SW)). Use units of length for rivers and streams).

ENVIRONMENT AFFECTED	SURFACE AREA OR VOLUME AFFECTED	UNITS
Terrestrial (eg. garden, field, roadside, grassland, forest) _____ _____ _____	Surface area _____ _____ _____	Units: Surface Area: m ² , hectare (ha), km ² or other (specify) _____ _____ _____
Aquatic (eg. pond, stream, lake, estuary, sediment) _____ _____	Surface area or volume affected _____ _____	Units: Surface Area: m ² , ha, km ² Length: m, km, Volume: L, m ³ or other (specify) _____ _____ FW, SW _____ FW, SW

20. Please draw a rough map of the area around the incident (indicate scale if possible). Include

- a) the area affected;
- b) any nearby waterways that were or could be affected and the direction of water flow;
- c) the location of any affected non-target organisms that were found;
- d) suspected location of pesticide release, application or spill; and
- e) any other details which may further clarify the incident (eg. topography, soil properties, water table).

21. Please describe any other details or additional information that further explain the cause of the incident, or facts that are not reported anywhere else in the form, how it occurred, the result and any remediation efforts (attach extra pages if required).

(V) Description of adverse effects:

22. Was there any direct evidence of severe hazards to non-target organisms? Examples are provided in the table below. Please identify which species was/were adversely affected in the incident. Be as specific as possible (common names, if possible scientific names) and complete as much as possible.

SPECIES OF ANIMAL OR PLANT	NUMBER OR PROPORTION AFFECTED	AGE OR DEVELOPMENT STAGE (EG. JUVENILE, LARVAL, SEEDLING)	OBSERVATIONS (EG. ABNORMAL MORPHOLOGY OR BEHAVIOUR, TOXICOLOGICAL SYMPTOMS)	DURATION OF EFFECT (INCLUDING DATE OF DEATH OR RECOVERY)
<i>Examples:</i>				
<i>terrestrial vertebrate</i>				
<i>Eg. Domestic cattle (Bos taurus)</i>	10	Adults	Excessive salivating, loss of balance, lethargy.	Recovered on 26 May 2002
<i>Eg. Birds – Mallard ducks (Anas platyrhynchos)</i>	40	Adults and juveniles	Disoriented, ruffled appearance, head lesions.	Recovered on 30 May 2002
	6	Juveniles	Disoriented, lethargy	Recovered on 21 May 2002
	5	Juveniles	Disoriented, lethargy	Died on 22 May 2002
Fish: <i>e.g: various species,</i>	<i>numerous,</i>	<i>all size classes,</i>	<i>dead fish on riverbank up to 3 km downstream of treatment area,</i>	<i>no information</i>
Invertebrates <i>e.g: honey bee (Apis mellifera),</i>	<i>100 colonies,</i>	<i>foraging during peak of flowering period,</i>	<i>colonies dead</i>	<i>all cases reported within 20 days post-application</i>

23. Was there any indirect evidence of severe hazards to non-target organisms (eg. unexpected population declines, disappearance of certain species in the incident area)? Please describe these effects.

24. Please provide any other relevant information such as:

(a) describing any links between the pesticide release (Section IV) and observed effects in nontarget organisms (22):

(b) any analytical measurements, if available, which confirm pesticide residues in soil, water, air or biological tissues

(VI) Management:

25. What practical steps (if any) were taken at the time the incident happened to limit or stop further release of the pesticide and/or its impact (excluding administrative/ regulatory steps)?

26. What steps (if any) were taken to clean up the area after the incident or to rehabilitate any species affected in the incident?

(VII) Reporting/communication:

27. Date of data collection/consultation:

28. Name and address of investigator/data collector:

29. Category of investigator/data collector (eg. environmental scientist, agricultural officer, government representative, etc.):

30. Contact if further information needed:

Telephone: _____

Fax: _____

E-mail: _____

31. Has this incident been reported elsewhere?

No

Yes To whom? _____

32. Did similar incidents happen in that area more frequently? Were they reported?

Send the completed incident report form to the Designated National Authority.

(Name and address of the DNA)

Appendix 3 – Tabular summary of comments received as a result of the pilot testing

Comments received from:

1. Hans de Kruijf (Ecoassistance Consulting, The Netherlands)
2. Pietro Fontana (ICRC expert, Switzerland)
3. Fatoumata Jallow Ndoye (ICRC expert, The Gambia)
4. Susanne Scholaen, (Pilot Project Chemical Safety, GTZ, Germany)
5. Alfredo Malarin, (Chief Technical Advisor, IPM project, Peru)
6. Ralf Peveling, (Institute for Nature and Environmental Protection, University of Basle, Switzerland)

Summary comments:	How was the comment taken into consideration
Hans de Kruijf (Ecoassistance Consulting, The Netherlands)	
Text is clear and understandable, but people with little education might need assistance in using and completing the form	Effort was made to keep form short and use simple terms and expressions
Provide ½ page example or description of an incident	Several simple examples are provided in the introduction to the form, Section: issues to consider. The comment made supports the development of a worked example.
Provide guidance and examples explaining when an environmental report should be made	The introduction to the from, in Section “Issues” provides suitable examples
Suggested to add a question “Did similar incidents happen in that area more frequently”	Accepted; Question 33 was added to report whether similar incidents happened in that area more frequently
Reporter should be briefed about the results of their report	To be addressed when a Environmental Incident Report from is received by the Secretariat
Raised concerns about negative repressions on the person who reports	To be addressed in the implementation phase of the Environmental Incident Report from
Pietro Fontana (ICRC expert, Switzerland)	
Suggestion to provide together with the copy of the label also the instructions for use, if available	Accepted; Question 7 was amended
Fatoumata Jallow Ndoye (ICRC expert, The Gambia)	
Suggested to insert a section on Information on the User (or applicator - level of education, experience, license)	Accepted; Question 17 was added
Susanne Scholaen, (Pilot Project Chemical Safety, GTZ, Germany)	
It is felt that completing the form is additional workload and therefore it is unlikely that the form be used	General effort to keep the form short while still providing sufficient information on the incident
Alfredo Malarin, (Chief Technical Advisor, IPM project, Peru)	
Training for field officer would be required, and	General effort to keep the form short

their supervisors would need to approve that preparing such reports becomes part of their official duties. The already heavy work load for DNAs is a constraint to their active participating in reporting incidents.	
Ralf Peveling, (Institute for Nature and Environmental Protection, University of Basle, Switzerland)	
Mixing of formulations is a critical issue (mixing of different pesticides, mixing with oil or water or other carriers)	Include Section I, as proposed, and request that Sections II and III be completed for each individual formulation of active ingredients.
Regarding Introduction to the form: Suggested to delete from the examples given the one example on sensitive species, as it is clear that such cases would apply.	Deleted in “Introduction to the form” the example on “disturbance of ecological key processes such as pollination, breakdown of organic matter, microbial nitrogen fixation, etc.
Part A: Transmittal of the form: All points should be written in plural because there may be several formulations involved in the incident	Accepted; and changed the words in Part A, and where relevant in Part B of the form into plural
Part B of the form should contain a clear reference number and date for each report	Accepted; introduced in upper right corner of Part B of the form a field for reference number/date
Introduce new Section I on “Number of formulations used”	Accepted; as suggested, new Section I with questions 1 and 2 introduced
Suggested to merge questions on “Name of active ingredient” and “relative amount” into one question	Accepted; new Question 5 combines both points
Suggested to be in Section II: Product Identity- Type of Formulation: more specific in listing the full list of GCPF codes for formulations of pesticides as an Annex to the form, or citing the most widely used formulations	Not incorporated in Question no.4. The full GCPF list of codes would make the form unnecessary long and citing only the most widely used formulations could be seen as a limitation to these formulations only.
Suggested improved wording on question regarding existence of use restrictions	Accepted; the wording was modified as per new Question 9
Move previous question 14b to 10	Accepted, previous question 14b became new Question 10
Move previous question 14c to 11	Accepted, previous question 14b became new Question 11
Suggested to bring the previous Questions number 11 to 17 in a more logical sequence	Rearranged the questions in such a way that Questions 12 to 17 would form a new Section III on “Description of the Treatment and how the formulation was used”
Suggested more detailed questions regarding “Pesticide preparation and application rate” in order to be more specific on how the formulations were mixed, stored and what the rate of each individual application was during the full cropping season.	Partially accepted; New Question 15 was modified, based on the previous Question no.14 and taken into consideration the suggestions made.
Suggested to add “hand-held sprayer”	Accepted: New Question 16 contains also the category “hand-held sprayer”
Suggested reorganization of the Table describing the extend of the environment affected	Partially accepted: The table in Question 19 was modified. It contains two categories only (Terrestrial/Aquatic, with Fresh water and Salt water as the two main types of Aquatic environment.

Suggested to offer that photocopies of topographical maps, etc. be appended	Not incorporated into Question 20. It is felt that a drawing appended to the report be sufficient. Efforts were made to keep the balance between details requested and length of the form.
Suggested to provide examples not only for Terrestrial, but also for Fish and Invertebrates	Question 22 was modified to provide more examples of Species affected.
Suggested to add a question on “indirect evidence of effects on non-target organisms”	Accepted; Question 23 on “indirect evidence of effects on non-target organisms” was added.
Suggested to add a question on “evidence of severe disturbance of ecological processes”	Not supported; It is not likely that such information is available at field level or to people completing the form.
Suggested to modify the question on availability of analytical measurements in order to include “availability of analytical data that support a cause-effect relationship” (e.g. pesticide residues in soil, water, bio-tissues, enzyme concentrations, etc.)	Not supported; it is suggested to keep the term “information” rather than to introduce “data” as this might be essential to allow field staff to simply report on observations, rather than requiring scientist to provide analysis.
Suggested to include a question requesting to indicate the main sources of information used for each of the Sections I – VII.	Not supported;
Suggested to Append to the form the GCPF Code for Pesticide Formulations, and a Glossary of Terms	Not supported;