



UNEP



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

Fifth meeting

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Item 4 (c) (i) of the provisional agenda*

**Listing of chemicals in Annex III of the Rotterdam Convention:
consideration of the draft decision guidance document for alachlor**

Consideration of the draft decision guidance document for alachlor

Note by the Secretariat

1. In accordance with the process for the development of decision guidance documents set out in decision RC-2/2, the internal proposal for alachlor was circulated to the Chemical Review Committee and its observers for their information and comments. The annex to the present note contains a tabular summary of the comments received thereon and how they were taken into account in preparing the draft decision guidance document on alachlor. The text in the annex has not been formally edited.
2. The draft decision guidance document for alachlor has been made available as document UNEP/FAO/RC/CRC.5/12.

* UNEP/FAO/RC/CRC.5/1.

Annex

Tabular summary of comments on the internal proposal on alachlor

Country	Section	Comment/Suggestion	Response
Switzerland	Abbreviations	AOEL, PPE, TER PPR Operator exposure assessment gave values over AOEL only using the UK model but not the German – DGD suggests both models gave values over the AOEL.	Abbreviations added and put into alphabetical order PPR is a specific European Commission committee rather than a general abbreviation so the name in full has been added p20 Section 5.1 No change. The 2003 Annex B Addendum (Alachlor Additional Supporting documentation provided by the European Community UNEP/FAO/RC/CRC.4/8/Add.3) suggests that the German model gives values below the AOEL. However, at this time the AOEL was provisionally set at 0.01 mg/kg bw/day. The final AOEL was set at 0.0025 mg bw/day and the End point list 2005 (UNEP/FAO/RC/CRC.4/8/Add.2) states that for a Lasso EC operator, alachlor is not accepted for proposed use with UK POEM and German model
Nigeria	Abbreviations	Insert CAS after CA	Abbreviation added
Chile	Abbreviations	PEC, NOEC, DT50, PPE	Abbreviations added
Czech Republic	Annex 1. Section 5.1 Annex 1. Section 5.6	Wording in the two paragraphs is not coherent as to whether values have been determined or predicted.	Wording has been clarified – Concentrations have been found at concentrations higher than 1 and predicted at concentrations higher than 1 and 10.
Sweden	Section 2.2 Section 3.3 Section 4.2	High toxicity as described in Annex I, 5.2 should also be noted in 2.2 Example given in Aldicarb DGD Clarification on possibility to set ADI	No change. The wording in this part of the DGD is taken from the notification of the EC and presents what is outlined as the main concerns in the regulatory action. As the comment says further details are stated in Annex 1. Alternative substances / products are only given when these are suggested by the documents of the notifying parties. Generic wording on alternative strategies added as in the Aldicarb DGD. Clarification added.

	Annex 1. Section 5.2	and AOAEL Use PEC/PNEC rather than TER	No change - the EC risk assessment uses TERs in their assessment and so this is used in the DGD.
Japan	Annex 1. Section 2.2.2 Annex 1. Section 2.2.4	Haematotoxicity changed to 'toxicity on red blood cells' Add rat/mouse strains Add Occupational data	No change. This wording is taken from the EC notification and the endpoints list of the EC risk evaluation (UNEP/FAO/RC/CRC.4/8/Add.2). There is haemolytic anaemia and haemosiderosis described in the animal studies. The strains of rats (Long-Evans) and Mice (CD-1) are added to the text in 2.2.4 as appropriate. No change. The occupational data was considered in the EC risk evaluation but was not in the end points list upon which the assessment was made
Finland		response indicating no comments	
Ukraine		response indicating no comments	
Germany		response indicating no comments	
Canada		response indicating no comments	
Croplife		The comments from Monsanto are on the Notifications and the Risk Evaluations that were discussed at CRC4. There are no specific comments on the Draft DGD.	No changes