



UNEP



**United Nations  
Environment Programme**

**Food and Agriculture Organization  
of the United Nations**

Distr.: General  
27 November 2008

Original: English

---

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

Fifth meeting

Rome, 23–27 March 2009

Item 4 (c) (ii) of the provisional agenda\*

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

## **Consideration of the draft decision guidance document for aldicarb**

### **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 aldicarb 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 aldicarb. The text in the annex has not been formally edited.
2. The draft decision guidance document for aldicarb has been made available as document UNEP/FAO/RC/CRC.5/13.

---

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

## Annex

## Tabular summary of comments on the internal proposal on aldicarb

| Country     | Section  | Comment/Suggestion  | Response  |
|-------------|--|---|---|
| Nigeria     | Abbreviations.                                     | Add a.i. active ingredient  | Added to Abbreviations  |
| Sweden      | Section 2.2  | Better to use PEC/PNEC rather than TER.   | No change. The EC risk evaluation uses TER values.  |
|             | Section 2.2  | Add more information on Jamaica 'island ecology' if important.  | Explanation added   |
|             | Section 2.2 and Section 3.5                        | Aldicarb poisoning from fruit consumption important and useful to add to Section 2.2 'residue risks, not only in Annex 1, section 3.5         | No change. Poisoning was not in the EC risk evaluation as an endpoint and so it is not included in this section. It is in the Annex based on internationally available sources. |
| Japan       | Section 2.1.1                                      | 'Inhibitor of true (brain, erythrocyte) ChE' (in contrast to pseudo-ChE) and uniformity of expressing ChE throughout text, use cholinesterase | 'True' added as suggested and cholinesterase used through DGD   |
|             | Section 3.6  | 'small farmers' is misleading, suggest 'small-scale farmers'  | Wording changed as suggested  |
| Canada      | Section 2.2, Human Health EC                       | Mentions consumers but no details of assessment   | Wording added on the consumer assessment.   |
|             | Section 2.2, Residue Risks Jamaica and Section 3.1 | Aldicarb up to 20 ppm on fruit in USA but p17 up to 0.2 ppm   | 0.2 ppm is correct and wording changed to this.   |
|             | Section 3.1  | European Commission should be European Community  | Corrected   |
|             | Section 4.1  | Hazard Classification for US EPA and UN not included  | US EPA cancer classification added<br>UN has no classification apart from Hazard Class and Packing Group listed in 4.3  |
| Finland     |  | response indicating no comments   |   |
| Ukraine     |  | response indicating no comments   |   |
| Germany     |  | response indicating no comments   |   |
| Switzerland |  | response indicating no comments   |   |

| Country  | Section   | Comment/Suggestion  | Response   |
|----------|---|---|--|
| Croplife | Section 1. Uses in regulated category (Comment 1) | <p><b>DGD Proposal</b><br/>Granular formulations of aldicarb were known to be used as insecticides to control sucking aphids, mites, leaf miner and nematodes particularly in citrus fruit and ornamentals.</p> <p><b>New proposal</b><br/>Temik 15 GR formulation of Aldicarb was known to be used as insecticide to control sucking aphids, mites, leaf miner and nematodes in citrus fruit and ornamentals.</p>  | Notification from Jamaica says Temik 10G and 15G so wording changed to:<br><i>Temik 10 and 15 granular formulation of Aldicarb was known to be used as insecticide to control sucking aphids, mites, leaf miner and nematodes in citrus fruit and ornamentals.</i>   |
|          | Section 1. Uses in regulated category (Comment 2) | <p><b>DGD Proposal</b><br/>Before 1975 they were available to all farmers and could be applied to vegetables. They were applied to soil by hands.</p> <p><b>New proposal</b><br/>It has been reported that Temik is in the hands of persons that are not capable of handling the product and it is being used on vegetables and other products for which the health consequences to both, user and consumer as well as the environment may be regrettable</p>   | Changed to: <i>'They were available to all farmers and could be applied to vegetables. They were applied to soil by hands'</i> , which is precisely the wording from the notification.   |
|          | Section 2.1 (Comment 3)                           | <p><b>DGD Proposal</b><br/>Aldicarb was on the second schedule (prohibited list) of the Pesticides act 1975, however, a registration was subsequently found on the Jamaican register of pesticides. In 1994, reregistration was refused and it was decided that no further registrations would be considered.</p> <p><b>New proposal</b><br/>Aldicarb was on the second schedule (prohibited list) of the Pesticides act 1975, however, a registration was subsequently found on the Jamaican register of pesticides. In December 1994, the decision was made to prohibit Aldicarb from importation and use in Jamaica.</p> | Addition of <i>'December'</i> , otherwise no change as this wording is from the Jamaican notification  |
|          | Section 2.2. Jamaica: Human health (Comment 4)    | <p><b>DGD Proposal</b><br/>Aldicarb is used primarily on citrus and ornamentals on small and medium farms in Jamaica. There is no program to manage the distribution of Aldicarb which meant that small farmers would have access to and use Aldicarb on a wide range of crops including tomatoes.</p> <p><b>New proposal</b><br/>Aldicarb was used on citrus and ornamentals in Jamaica. In the years before 1994, specific products were available to a limited number of farms under a stewardship program implemented by the manufacturer</p>   | Wording changed to: <i>In the years before 1994, specific products were made available to a limited number of farms under a stewardship program implemented by the manufacturer. However, it was reported that products containing aldicarb were in the hands of persons that were not capable of handling them and were being used on a wide range of crops including tomatoes.</i> This wording is most faithful to what was in the Jamaican notification and the information provided by industry during CRC-4. |

| Country | Section   | Comment/Suggestion   | Response  |
|---------|---|--|---|
|         | cont'd<br>(Comment 5)   | <b>DGD Proposal</b><br>Pesticide operators on such small farms do not have access to protective gear. Also hot tropical conditions make protective uncomfortable. Use of the product represents an unacceptable risk to the health of these small farmers.<br><b>Delete</b>  | No change. Wording is from the Jamaican notification.   |
|         | Section 2.2.<br>Jamaica:<br>Environmental impact<br>(Comment 6) | <b>DGD Proposal</b><br>Jamaica has several areas of limestone and underground rivers where much of the farming is done. Consequently, as evidenced by the incidents of pollution in the US, there is a risk of contamination of groundwater and surface water.<br><b>Delete</b>  | No change. This wording is from the notification and the PCA document.  |
|         | Section 4.5<br>(Comment 7)                                      | <b>DGD Proposal</b><br>Sweep spilled aldicarb into containers. If appropriate, moisture first to prevent dusting.<br>Carefully collect remainder, and then remove to a safe place.<br><b>New proposal</b><br>Sweep spilled aldicarb into containers. After careful collection, store the container in a safe place.  | No change. This wording is from the International Chemical Safety Card for Aldicarb and does suggest the use of moisture 'if appropriate' |
|         | Annex 1.<br>Introduction<br>parag.1<br>(Comment 8)              | <b>DGD Proposal</b><br>The information presented in this Annex reflects the conclusions of the two notifying parties:<br>European Community and Jamaica. In a general way, information provided by these two parties on the hazards are synthesized and presented together, while the risk assessments specific to the conditions prevailing .<br><b>New proposal</b><br>The information presented in this Annex reflects the conclusions of the two notifying parties:<br>European Community and Jamaica. In a general way, information provided by these two parties on the hazards are synthesized and presented together, while the risk assessment / risk evaluation specific to the conditions prevailing. | No change. This is the general wording for DGDs.  |
|         | Annex 1.<br>Introduction,<br>parag.3<br>(Comment 9)             | <b>DGD Proposal</b><br>The notification of Jamaica includes consideration of the Environmental Health Criteria .....<br>(US EPA, 1988), <b>comparing the worker exposure and leaching conditions with the conditions of use in Jamaica.</b><br><b>New proposal</b><br>The notification of Jamaica drafted in 2007 includes consideration of the Environmental Health Criteria ..... (US EPA, 1988).  | No change. The sentence is based on what has been described as conditions of use in Jamaica in the notification.                          |

| Country | Section                                 | Comment/Suggestion  | Response  |
|---------|---|---|---|
|         | Annex 1. Section 3.1 Food (Comment 10)  | <p><b>DGD Proposal</b><br/>Residues have been detected in a variety of crops on which Aldicarb has been applied.</p> <p><b>New proposal</b><br/>Residues have been detected <b>in the US</b> in a variety of crops on which Aldicarb has been applied.</p>  | Wording 'in the USA' added as suggested   |
|         | Annex 1. Section 3.1 Food (Comment 11)  | <p><b>DGD Proposal</b><br/>The evaluation by Jamaica reported that the aldicarb product, Temik, was in the hands of persons that were not capable of handling the product and were not wearing PPE, and it was used on vegetables and other products where there were potential health concerns for both the consumer and user (PCA, 1995).</p> <p><b>New proposal</b><br/>The evaluation by Jamaica stated that it has been reported that the aldicarb product, Temik, was in the hands of persons that were not capable of handling the product and were not wearing PPE, and it was used on vegetables and other products where there were potential health concerns for both the consumer and user (PCA, 1995).</p> | Changed as suggested.   |
|         | Annex 1. Section 3.1 Food (Comment 12)  | <p><b>DGD Proposal</b><br/>It was concluded that there was an unacceptable risk of contamination of food products in Jamaica based on known incidents in the USA <b>and the normal pattern of use under the prevailing conditions in Jamaica.</b></p> <p><b>New proposal</b><br/>It was concluded that there was an unacceptable risk of contamination of food products in Jamaica based on known incidents in the USA.</p>   | No change. The PCA reference does compare use of aldicarb in USA and Jamaica and ecology of Jamaica.  |
|         | Annex 1. Section 3.3 Water (Comment 13) | <p><b>DGD Proposal</b><br/>..... (PCA, 1995).</p> <p><b>New proposal</b><br/>?????.</p> <p><b>Reasoning</b><br/>The working group on the draft DGD for aldicarb should clarify with the DNA from Jamaica how an evaluation from 1995 could be used for a decision in 1994 or even for the earlier decision in 1975, as this was the basic date of notified regulatory decision of Jamaica.</p>  | The PCA document is dated December 1994 but the headings on the document are 1995 (probably referring to publication). All reference to this document in the DGD changed to 1994 as it is stated in the Reference List. |

| Country | Section                                       | Comment/Suggestion   | Response   |
|---------|---|--|--|
|         | Annex 1. Section 3.3 Water<br>(Comment 14)    | <p><b>DGD Proposal</b><br/> <b>As Jamaica has several areas of limestone and underground rivers where much of the farming is done</b> it was concluded that there was a risk of contaminating ground water and hence, drinking water, based on known incidences in the USA.</p> <p><b>New proposal</b><br/>                     It was concluded that there was a risk of contaminating ground water and hence, drinking water, based on known incidences in the USA.</p>  | No change. This wording is in the Jamaican notification  |
|         | Annex 1. Section 3.4<br>(Comment 15)          | <p><b>DGD Proposal</b><br/>                     Pesticide operators, mainly small farmers, in Jamaica do not have access to protective gear. A further reason why they fail to wear protective clothing is that it is uncomfortable in the hot tropical climatic conditions. Therefore, use of the product was considered to represent an unacceptable risk to the health of small farmers (PCA, 1995).</p> <p><b>Delete</b></p>   | No change. This wording is from the Jamaican notification. However, the suggested reference on the supporting document provided by Jamaica on the use of PPE has now been added in the list of references. |
|         | Annex 1. Section 5.2<br>(Comment 16)          | <p><b>DGD Proposal</b><br/>                     ..... (PCA, 1995). <b>Jamaica has several areas of limestone and underground rivers, where much of the farming is done.</b></p> <p><b>Delete</b></p>   | No change. This wording is from the Jamaican notification.   |
|         | Annex 1. Section 5.6<br>(Comment 17)          | <p><b>DGD Proposal</b><br/> <b>Jamaica has several areas of limestone and underground rivers, where much of the farming is done. Consequently, as evidenced by the incidents of pollution in the US, there is a risk of contamination of ground water and surface water</b></p> <p><b>Delete</b></p>   | No change. This wording is from the Jamaican notification.   |
|         | Annex 2. Jamaica. Section 4.2<br>(Comment 18) | <p><b>DGD Proposal</b><br/> <b>Comparison of conditions in agricultural areas in Jamaica with similar conditions</b> in the USA where contamination of ground and drinking water has been described despite use under very restricted conditions. The island ecology of Jamaica is more vulnerable than conditions in the USA. Contamination of citrus fruit has also been observed in the USA. <b>The lack of access to and proper use of protective equipment in Jamaica by small farmers were also considered.</b></p> <p><b>New proposal</b><br/>                     The island ecology of Jamaica is more vulnerable than conditions in the USA. In the USA contamination of ground and drinking water has been described despite use under very</p> | No change. This wording is based on what was contained in the Jamaican notification and supporting documentation from Jamaica.   |

| Country | Section                                | Comment/Suggestion  | Response  |
|---------|--|---|---|
|         | Annex 4.<br>References<br>(Comment 19) | <p>restricted conditions. Contamination of citrus fruit has also been observed in the USA. It has been reported in Jamaica that Temik is in the hands of persons that are not capable of handling the product and is being used on vegetables and other products for which the health consequences both user and consumer as well as the environment may be regrettable.</p> <p>In the draft DGD reference list the following references of documents are missing:<br/> <b>1:</b> PCA (1995).<br/> <b>2:</b> Document on the availability of personal protective equipment (PPE) in Jamaica (reference). They must be added to the reference list, to be in line with the citations and the given Statements.</p> | <p>1. The PCA document is actually dated December 1994, but the headings on the document are 1995. All reference to this document in the DGD changed to 1994 as it is stated in the Reference List.<br/> 2. The document on the use of PPE in Jamaica as available to the CRC has been added to the Reference list.</p> |