



**United Nations
Environment Programme**

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

Distr.: General
1 December 2005

English only

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

Second meeting

Geneva, 13–17 February 2006

Item 5 (b) of the provisional agenda*

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

Alachlor: supporting documentation provided by the Netherlands

Note by the secretariat

The annex to the present note contains the supporting documentation provided by the Netherlands in support of its final regulatory action onalachlor.

* UNEP/FAO/RC/CRC.2/1.

Annex:

Focused summary – Alachlor

I. Introduction

- (a) The registration of alachlor and all relating products were withdrawn from the market in The Netherlands from 1 January 1987 onwards. This decision was based on an evaluation of the properties of alachlor, especially the information on carcinogenicity of the substance in combination with the precaution principle that residues from pesticides should not be found in groundwater intended for the abstraction of drinking water. The active substance and two important metabolites were found to have leaching characteristics in amounts of 40% of the dose applied. In soils with low organic matter (<3%) leaching was found to be even higher (up to 92%).
- (b) The decision aims at a complete reduction of the risk of alachlor emission to the environment due to the application of the substance as a pre- and post emergence herbicide in the culture of corn, vegetables and forage crops. In view of the supposed carcinogenic properties of alachlor leaching to groundwater would be an unacceptable risk to the general population. In The Netherlands groundwater can be used for drinking water and therefore must remain free from pesticides (precautionary principle).
- (c) Substances with carcinogenic properties can not be registered in The Netherlands (Pesticide Act, 1962 and later revisions). In combination with the leaching potential of the substances and relating metabolites the risk to the general public was considered to be too high.
- (d) The decision to withdraw the substance alachlor from the Dutch market was aimed at all products containing the substance alachlor. The final result was a complete reduction of the risk to the general public.

II. Risk evaluation

- (a) The risk evaluation of The Netherlands focussed on the carcinogenic properties of alachlor and the possible contamination of groundwater by the substance. It was established by laboratory research in two chronic studies that the substance alachlor showed nasal tumours to rats. In addition, the leaching potential of the substance and relating metabolites showed amounts of about 40% of the dose occurring in the leachate. In soils with low organic matter (<3%), as is quite usual in The Netherlands, the leaching was found to be even higher (up to 92% of the dose).
- (b) The decision is based on the review of all available data as present in the registration dossier of the notifier. Research carried out by the notifier to support the registration request is summarised and evaluated by the national authorities in preparation of the registration decision. The main conclusions of the evaluation are laid down in a registration decision document by the Dutch Board for the Registration of Pesticides. For alachlor this has been done in 1986 as indicated in the references below for the carcinogenic properties of alachlor and in 1994 for the environmental studies.
- (c) CTB (1986) Verslag Werkgroep L. 132^e vergadering d.d. 28 augustus 1986. Agendabijlage L-132.9.2.1. Standpunt RIVM-DGA van E.M. den Tonkelaar en C.L. Maas (in Dutch).
CTB (1994). Verslag C-24.3.6 d.d. 17 June 1994 (in Dutch).
- (d) The general public may be exposed to the substance alachlor and relating residues if the substance reaches groundwater. In The Netherlands a large proportion of the drinking water produced is abstracted from groundwater (c. 40%). According to the leaching characteristics of alachlor and its

residues the contamination of groundwater is expected to be unacceptable as about 40% of the dose was found in the leachate of soil column studies and even up to 90% in soils with an organic matter content of less than 3%.

III. Risk reduction and relevance to other States

- (a) As the substance is still registered in several countries there is trade going on with alachlor. No further information available.
 - (b) After the described decision the use of alachlor in The Netherlands reduced to zero. Therefore, no risk is to be expected any more to the general public.
 - (c) The substance alachlor is typically used in the culture of corn, vegetables and forage crops as a herbicide. The application takes place mainly in spring and early autumn with dosages of 2.4 – 2.9 kg a.i./ha.
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