



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**

Third meeting

Rome, 20–23 March 2007

Item 5 (c) (ii) of the provisional agenda*

Listing of chemicals in Annex III of the Rotterdam Convention:

consideration of the draft decision guidance documents for: tributyltin compounds

Consideration of the draft decision guidance document for tributyltin compounds

Note by the Secretariat

1. In accordance with the process for the development of decision guidance documents agreed by the Chemical Review Committee at its first meeting and later set forth in decision RC-2/2, the internal proposal for tributyltin compounds 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 on the internal proposal and how they were addressed in preparing the draft decision guidance document on tributyltin compounds. The annex has not been formally edited.
2. The draft decision guidance document for tributyltin compounds is set out in document UNEP/FAO/RC/CRC.3/14.

* UNEP/FAO/RC/CRC.3/1.

Annex

Tabular summary of comments on the internal proposal on TBT

Section	Author	Comments	How dealt with
Section 1	Samoa	Under the heading trade names ask whether checked with basic manufacturers	Basic trade names taken from the original notifications. As stated, the list it is indicative and not intended to be exhaustive. Draft was sent to all CRC members and observers for comment, including observers from industry.
	Germany	Under the heading Basic Manufacturers, provide information regarding the legal successor of a company listed there. The legal successor of Witco GmbH is Chemtura Organometallics GmbH, Postfach 1620, 59180 Bergkamen, Germany	Document amended
	Netherlands	Under the heading Chemical structure, comment: the formula should read C ₁₂ H ₂₇ SnX instead of C ₁₂ H ₂₈ SnX	Document amended
Section 2	Switzerland	Para.1 request to spell out the name of the chemical at the beginning to read Tributytin Compounds (TBTs)	Document amended
Section 2.1	South Africa	Request to add a reference to the relevant government publications to both notifications from Canada and the EU.	No change. Section 2.1 refers to Annex 2 for details
Section 3.1	South Africa	request to add a generic statement regarding FAO guidelines on Good Labelling Practice for Pesticides	No change. A statement is not relevant to this section. A reference to the FAO guidelines is included in the Relevant Guidelines and Reference Documents listed in Annex 4.
Annex 1	Canada	Request to add the reference “IPCS, 1990” to the following sections of Annex I: S.1.13 at the end of the section; S.2.1.3 at the end of para.1; S.2.2.1 after 5 th line and at the end of para.2; S.2.2.2 at the end of Para.1 and 2; S.2.2.3 at the end of Para.1; S.2.2.4 at the end of Para.2; S.2.2.5 at the end of Para.1 and 2;	Document amended
		Request to add the reference “Atkins International Ltd,1998”to the following sections of Annex I: S.1.13 at the end of the section;	Document amended. Atkins International Ltd., 1998 added to reference list as abbreviation
		S.3.1 Para.2 Line 1, after “The risk evaluation of the European	No change; source clear from text

Section	Author	Comments	How dealt with
		<p>Community”;</p> <p>S.3.2. Para.2 2nd line, after “the risk evaluation of the European Community”;</p> <p>S.3.3 at the end of Para. 1;</p> <p>S.3.4 at the end of Para. 3;</p> <p>S.3.6 at the end of the section;</p> <p>S.4.1.2 at the end of Para.1 and 2;</p> <p>S.4.1.5 at the end of the section;</p> <p>S.4.2.2 after line 7 and 9;</p> <p>S.5.2 at the end of the section;</p> <p>Request to add the reference “Maguire, 2000”to the following sections of Annex I:</p> <p>S.4.1.4 at the end of Para. 1;</p> <p>S.4.2.2 at the end of line 12 and the end of the section;</p> <p>Request to add the reference “PMRA, 2002” to Section 5.2, at the end of Para.3.</p>	<p>No change; source clear from text</p> <p>No change; source clear from text</p> <p>No change; source clear from text</p> <p>No change; source clear from text</p> <p>Document amended. Atkins International Ltd., 1998 added to reference list as abbreviation</p> <p>Document amended. Maguire, 2000 added to reference list as an abbreviation</p> <p>No change; source clear from text</p>
Annex 1 / 1.2	Netherlands	Comment: the formula for Tributyltin linoleate should read: $C_{30}H_{58}O_2Sn$ instead of $C_{30}H_{58}O_2Sn$.	Document amended
Annex 1 / 3.5	Canada	<p>Para.1, 1st sentence, question the source of information</p> <p>Request to add to line 4 a cross reference (Annex 1, S.3.4) after the words human data</p>	<p>No change, this sentence comes from EU CSTEE Opinion, a background document to European Community notification</p> <p>Document amended</p>
Annex 1 / 4.1.2	South Africa	Request to remove the comments on persistence as it is a duplication of section 4.1.5	Document amended
Annex 1 / 4.1.4	Netherlands	Comment: Probably, the octanol / water partition coefficients refer to different kind of TBTs, indicating a range of 3.2 – 4.1. In Section 1, Physico-Chemical properties a range is given of 3.19 – 3.84. Therefore, these ranges do not match and this should be explained if the sentence on page 19 will be kept there. However, the author is in favour of deleting the sentence on the K_{ow} here,	Document amended. Deletion of sentence 1 Annex 1, section 4.1.4. The range 3.19-3.84 is taken from IPCS (1990) and is in both notifications. The range 3.2-4.1 is taken from the Canadian background document PMRA, 2002.

Section	Author	Comments	How dealt with
		i.e. first sentence of this section because there are bioconcentration studies available and thus overrule the K_{ow} conclusion on bioconcentration.	
Annex 1 / 4.2.1	Thailand	Comment: information regarding "bee"+ "insect" should be transfer to Annex 1/section 4.2.3 because these are "arthropods" not "vertebrates"	Document amended, this information has been transferred to Annex 1 section 4.2.3
Annex 1 / 4.2.2	Canada	3 rd line, comment: LC 50 for juvenile <i>M. edulis</i> is 66d, not 48 h, according to Atkins report	Document amended
Annex 2	Slovenia	Title of the Annex: Request to delete the later part of the title in the circulated version with the words "For Canada to comment/correct but see comments below"	Document amended
Abbreviations	Thailand	Request to add "RTECS" in Standard Core Set of Abbreviations	Document amended
General comments	Mauritius	Providing information on regulatory status of TBT in Mauritius	Noted