

Summary of the 18th Meeting of the Chemical Review Committee of the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade: 19-23 September 2022

Meeting in person for the first time since 2019, the Chemical Review Committee (CRC) of the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade faced a lengthy agenda. The CRC's members were tasked with reviewing a dozen hazardous chemicals and pesticides to determine whether they need to be restricted to protect human health and the environment.

The CRC considered and approved draft decision guidance documents for terbufos and iprodione. The CRC forwarded this guidance to the Conference of the Parties (COP) with its recommendations to list these substances in Annex III to the Convention. Annex III includes pesticides and industrial chemicals that have been banned or severely restricted for health or environmental reasons by two or more parties and that the COP has decided to subject to the PIC procedure.

The CRC also reviewed notifications of final regulatory action on 10 chemical substances: amitrole, carbaryl, carbon tetrachloride, chlorfenvinphos, methidathion, methyl bromide, methyl parathion, mirex, paraquat and thiodicarb, concluding that methyl bromide and paraquat meet the criteria for listing banned or severely restricted chemicals under the Rotterdam Convention.

CRC-18 convened face-to-face from 19-23 September 2022 at the headquarters of the Food and Agriculture Organization of the United Nations (FAO) in Rome, Italy. Over 80 people participated in this meeting, including 30 Committee members and approximately 50 observers from governments, civil society, and industry.

The 31 current members of the CRC include: Jonah Ormond (Antigua and Barbuda), Anahit Aleksandryan (Armenia), Qinghong Pu (Australia), Jürgen Helbig (Austria), Mirijam Seng (Belgium), Christian Bart (Canada), Cangmin Li (China), Carles Escriva (Germany), Joseph Cantamanto Edmund (Ghana), Carlos Enrique Acevedo González (Guatemala), Suresh Lochan Amichand (Guyana), Dinesh Runiwal (India), Yenny Meliana (Indonesia), Judite Dipane (Latvia), Hassan Azhar (Maldives), Saida Ech-Chayeb (Morocco), Shankar Prasad Paudel (Nepal), Charles Bodar (Netherlands), Zaigham Abbas (Pakistan), Christian Sekomo Birame (Rwanda), Aïta Sarr Seck (Senegal), Suzana Andrejevic Stefanovic

(Serbia), Noluzuko Gwayi (South Africa), Sumith Arachchige (Sri Lanka), Victorine Augustine Pinas (Suriname), Sarah Maillefer (Switzerland), Palarp Sinhaseni (Thailand), Hasmath Ali (Trinidad and Tobago), Youssef Zidi (Tunisia), Daniel William Ndiyo (Tanzania), and Clorence Matewe (Zimbabwe).

A Brief History of the Rotterdam Convention and the CRC

Over the past 40 years, growth in chemical production and trade has increasingly raised concerns about the potential risks posed by hazardous chemicals and pesticides to human health and the environment. Developing countries are particularly vulnerable to these effects, as they largely lack the infrastructure to monitor chemicals' import and use. In response to these concerns, under the auspices of the FAO and the UN Environment Programme (UNEP), the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade was adopted in September 1998. The Convention entered into force on 24 February 2004.

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The Convention's objectives are to:

- promote shared responsibility and cooperative efforts among parties in the international trade of certain hazardous chemicals in order to protect human health and the environment from potential harm; and
- contribute to the environmentally sound use of those hazardous chemicals by facilitating information exchange about their characteristics, providing for a national decision-making process on their import and export, and disseminating these decisions to parties.

The Prior Informed Consent (PIC) procedure is a mechanism for obtaining and disseminating the decisions of importing parties on whether they wish to receive future shipments of certain chemicals, and for ensuring compliance with these decisions by exporting parties.

The procedure applies to chemicals listed in Annex III of the Rotterdam Convention, which includes pesticides, industrial chemicals, and severely hazardous pesticide formulations (SHPFs). The Convention creates legally-binding obligations for the implementation of the PIC procedure.

The role of the CRC: The CRC is a subsidiary body of the Rotterdam Convention established to review notifications of final regulatory action (FRA) against the criteria set out by the Convention in Annex II (for chemicals) and IV (for SHPFs) and make recommendations to the Conference of the Parties (COP) for listing such chemicals in Annex III. Proposals to include chemicals under Annex III are submitted to the CRC, with the final decision taken by the COP.

There are two ways to trigger the addition of new chemicals to Annex III. For pesticides and industrial chemicals, all parties must notify the Secretariat of any regulatory action they have adopted domestically to ban or severely restrict a chemical for environmental or health reasons. When the Secretariat receives two notifications of FRA from two different PIC regions (Africa, Asia, Europe, Latin America and the Caribbean, Near East, North America, and Southwest Pacific) that meet the criteria established in Annex I to the Convention (which describes properties, identification, and uses of the chemical and information on the regulatory action), it forwards the notifications to the CRC. The Committee then screens the notifications according to the criteria contained in Annex II. If the CRC finds the criteria are met, it recommends listing the chemical in Annex III and prepares a decision guidance document (DGD) for consideration by the COP.

Any party that is a developing country or country with an economy in transition can propose a SHPF for listing, and the Committee screens these against the criteria in Annex IV.

The CRC has met annually since the Convention's entry into force.

Recent Highlights

CRC-14: In 2018, the CRC adopted the DGDs for acetochlor, hexabromocyclododecane (HBCD) and phorate, and agreed that these chemicals met the criteria to be listed in Annex III. The Committee agreed that the notifications for perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds met the criteria. CRC-14 agreed to set aside a notification on methyl-parathion, deciding that it had not met all the criteria for listing.

COP-9: In 2019, COP-9 voted to adopt a compliance mechanism that established a new annex to the Convention, concluding 15 years of negotiations. The COP agreed to include HBCD and phorate in Annex III, but could not agree to list carbosulfan, acetochlor, paraquat, fenthion, or chrysotile asbestos.

CRC-15: In 2019, the CRC agreed to recommend the listing of decabromodiphenyl ether (decaBDE), a flame retardant, in Annex III, and reviewed the draft DGD on PFOA, its salts and PFOA-related compounds. The committee reviewed notifications of FRA on the herbicide amitrole and the industrial chemicals nonylphenols and nonylphenol ethoxylates, but in both cases determined that no further action would be taken until a country from a second PIC region notifies the CRC that it has taken action to ban or severely restrict the use of these chemicals.

CRC-16: Due to the COVID-19 pandemic, CRC-16 was held online in 2020. The CRC agreed to recommend that the COP list PFOA, its salts and PFOA-related compounds in Annex III of the Convention. The CRC also streamlined the language in the draft DGD on decaBDE, which recommends that decaBDE be listed in Annex III.

COP-10.1: With the COVID-19 pandemic continuing to prevent in-person meetings, the joint meetings of the COPs to the Basel, Rotterdam and Stockholm Conventions were split into two, with an online segment held in July 2021 and an in-person segment in 2022. The first segment of the COP addressed a streamlined agenda of essential work, including adoption of interim budgets for 2022 and election of members of the recently-established Rotterdam Convention Compliance Committee. It did not consider any chemicals recommended for listing.

CRC-17: Still operating in virtual format, in 2021 the CRC reviewed notifications of FRA on four pesticides: terbufos, thiodicarb, iprodione, and methidathion. The CRC concluded that the FRAs on terbufos and iprodione meet the criteria for listing and that DGDs for each should be prepared for consideration at CRC-18.

COP-10.2: The in-person segment of COP-10 convened in June 2022 and agreed to include decaBDE and PFOA, its salts, and related compounds in Annex III, but could not agree to list acetochlor, fenthion ultra-low volume formulations, paraquat dichloride formulations, carbosulfan, or chrysotile asbestos.

CRC-18 Report

On Monday, 19 September 2022, CRC-18 Chair Noluzuko Gwayi (South Africa), welcomed participants. She told members they had a "mammoth task" before them, urging them to be very efficient with Committee time without compromising the quality of its work.

Christine Fuell, FAO portion of the Rotterdam Convention Secretariat, highlighted the USD 1.5 million in technical assistance managed by FAO to help parties comply with the Convention. She also underscored the importance of CRC work by citing a recent study showing that 64% of global agricultural land is at risk of pesticide pollution, and 30% are at high risk of such pollution.

Carlos Martin-Novella, Deputy Executive Secretary, Basel, Rotterdam and Stockholm Secretariat, called the heavy CRC workload "a testament to the importance of your work" and stressed the importance of decisions based on sound science, noting that the fifth UN Environment Assembly mandated the creation of a

chemicals and waste science-policy panel that will assist future work on chemicals in this regard.

Organizational Matters

The CRC adopted the provisional agenda ([UNEP/FAO/RC/CRC.18/1](#)) and agreed to the organization of work proposed by the Secretariat ([UNEP/FAO/RC/CRC.18/INF/2](#)).

Review of COP-10 Outcomes Relevant to the Work of the Committee

On Monday, the Secretariat presented the outcomes of COP-10 relevant to the work of the Committee ([UNEP/FAO/RC/CRC.18/INF/31](#)), noting the COP decided to list decabDE and PFOA, its salts, and related compounds in Annex III, and this amendment will enter into force for all parties on 22 October 2022. She reported that the COP discussed challenges, concerns, views, and possible ways forward for dealing with chemicals that the CRC had recommended for listing but on which the COP could not reach consensus. She noted a COP decision calling for the Secretariat, in consultation with the CRC, to prepare an indicative list of PFOA, its salts and PFOA-related compounds, make it available on the Convention website and update it periodically. She invited members to submit comments on the draft list ([UNEP/FAO/RC/CRC.18/INF/32](#)) until 17 October 2022. She further noted that the COP requested the Secretariat to continue implementing training activities for new and existing members.

Abbas expressed concern about the number of chemicals recommended by the CRC that the COP has not yet agreed to list in Annex III. Chair Gwayi said it is up to Committee members to not only produce good quality work they can defend, but also to educate and inform decision-makers and others about the CRC's recommendations, which are based on science.

Rotation of the Membership

On Monday, the Secretariat introduced this item ([UNEP/FAO/RC/CRC.18/INF/3](#)), noting changes that were made during the intersessional period and that the terms of office of 14 members of the Committee expire on 30 April 2024, so COP-11 needs to appoint new members to fill these forthcoming vacancies on the Committee.

Technical Work

Consideration of the Draft Decision Guidance Document for Iprodione: On Monday, the Secretariat introduced the draft DGD for iprodione ([UNEP/FAO/RC/CRC.18/3](#)) and related comments and responses ([UNEP/FAO/RC/CRC.18/INF/4](#)).

The Chair of intersessional drafting group, Daniel William Ndiyo (Tanzania), introduced the draft DGD. Charles Bodar (Netherlands), assuming the role of drafter since the end of the term of the original drafter, Timo Seppälä, explained that the drafting group reviewed FRA notifications submitted by the European Union (EU) and Mozambique, together with the supporting documentation. He described issues in streamlining the language of the document and noted some absence of data.

The observer from CropLife objected to proceeding with a DGD on iprodione, saying the Mozambique FRA was not based on a proper risk evaluation involving prevailing conditions within Mozambique.

Apologizing for the delay in submitting comments on draft DGD, the observer from the US offered to provide in writing updated data and references involving US sources. The Committee tasked Ndiyo and Bodar to revise the draft DGD to take into account the updated US information.

On Thursday, Bodar presented the revised draft DGD (UNEP/FAO/RC/CRC.18/CRP.23), walking members through the changes made to account for the new data and references. He also noted that the drafters had added more environmental data.

The Committee decided to forward the DGD, as revised, along with the tabulated summary of comments and responses (UNEP/FAO/RC/CRC.18/CRP.22).

Final Decision: In its final decision (UNEP/FAO/RC/CRC.18/CRP.13), the CRC adopts the draft DGD for iprodione and forwards it, together with the related tabular summary of comments, to the COP for its consideration.

Consideration of the Draft Decision Guidance Document for Terbufos: On Monday, the Secretariat introduced the draft DGD for terbufos ([UNEP/FAO/RC/CRC.18/4](#)) and related comments and responses ([UNEP/FAO/RC/CRC.18/INF/5](#)). Christian Bart (Canada), assuming the role of drafter since the end of the term of the original drafter, Martin Lacroix, presented the draft DGD based on FRAs from Canada and Mozambique.

The observer from the US offered to provide in writing updated data and references involving US sources. The Committee tasked Bart and the Chair of the drafting group, Jonah Ormond, with revising the draft DGD to take into account the updated US information.

On Wednesday, Bart presented the revised draft DGD (UNEP/FAO/RC/CRC.18/CRP.16), walking members through the changes made to account for the new data and references. The Committee decided to forward the DGD, as revised, along with the tabulated summary of comments and responses (UNEP/FAO/RC/CRC.18/CRP.15).

Final Decision: In its final decision (UNEP/FAO/RC/CRC.18/CRP.14), the CRC adopts the draft DGD for terbufos and decides to forward it, together with the related tabular summary of comments, to the COP for its consideration.

Report of the Bureau on the Preliminary Review of Notifications of Final Regulatory Action: On Monday, the Secretariat introduced the agenda item ([UNEP/FAO/RC/CRC.18/2](#), [UNEP/FAO/RC/CRC.18/INF/6](#), and [UNEP/FAO/RC/CRC.18/INF/7](#)). She explained that, due to a high number of FRA notifications to be reviewed by the CRC, the Bureau decided to prioritize the work of the Committee. CRC-18 would consider the intersessional work by four task groups focused on additional FRA notifications for chemicals that were already under consideration by the Committee. In addition, CRC-18 would consider the notifications that could not be initiated or completed at CRC-17 due to lack of time. She explained that additional FRA notifications awaiting CRC review will be considered at a future meeting of the Committee.

Review of a Notification of Final Regulatory Action for Chlorfenvinphos: On Monday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/8](#); [UNEP/FAO/RC/CRC.18/INF/15](#); [UNEP/FAO/RC/CRC.18/INF/16](#); and [UNEP/FAO/RC/CRC.18/INF/17](#)).

Jonah Ormond (Antigua and Barbuda), Chair of intersessional Task Group 3, introduced the work of the Task Group on chlorfenvinphos. Sarah Maillefer (Switzerland), assuming the role of drafter since the end of the term of the original drafter, Kristine Kazerovska, presented the group's report. She explained that the Task Group found that the FRAs from Norway and Mozambique met all Convention criteria, but the one from Türkiye did not meet criterion b(iii)—the FRA is based on a risk evaluation involving prevailing conditions within the party taking the action—because the Turkish notification:

- states that the final regulatory action was not based on any risk or hazard evaluation;
- provided no information on actual, expected or anticipated exposure under prevailing conditions in Türkiye; and
- did not submit bridging information relating to risk evaluations performed in other countries.

A number of CRC members supported the Task Group's conclusions regarding the Norwegian and Turkish FRAs. The observer from Camara de Industria de Guatemala said Norway's FRA should be re-evaluated because Norway failed to submit a copy of the decree on which the FRA is based.

Regarding Mozambique's FRA, Bodar, Pu, Pinas, Ndiyo, Azhar, Ech-Chayeb, Meliana and Seck expressed support for the Task Group's conclusions. Bart expressed doubts about the Mozambique FRA meeting criterion b(iii), noting:

- no exposure information specific to Mozambique was provided;
- while supposedly the product of a policy on highly hazardous pesticides (HHP), chlorfenvinphos is classified by Mozambique as "close to" HHP status; and
- Mozambique's survey is on general use of pesticides, specific to agricultural uses in Mozambique, while chlorfenvinphos was registered only for veterinary uses.

Maillefer responded that:

- when the survey was conducted in Mozambique, it was possible that farmers used it as a pesticide because the country classifies it as a pesticide;
- the survey did not preclude use on animals;
- farmers responding to the survey showed they did not use proper personal protective equipment (PPE), so it is not unreasonable to expect that they would not wear proper PPE to treat their animals; and
- chlorfenvinphos is classified by the World Health Organization (WHO) as class 1b (highly hazardous) because of its high dermal lethal dose 50 (LD50) value.

Helbig seconded Maillefer's arguments, supported the Task Group's conclusions, and argued that Mozambique's FRA did meet the b(iii) criterion because it did a risk evaluation while considering international sources and was based on prevailing conditions in the country. He found the survey relevant because chlorfenvinphos is used as a veterinary pesticide there.

Citing [CRC Handbook](#) passages regarding handling of FRA for chemicals involving "unacceptable risks to workers," Escriva said it is clear criterion b(iii) is met.

Sinhaseni questioned if the CRC would be setting a bad precedent in declaring the FRA as meeting all criteria "when it clearly is not based on a risk assessment." Chair Gwayi reminded members that CRC is concerned with risk evaluations, not risk assessments.

The observer from the US, with the observer from Camara de Industria de Guatemala, said Mozambique's general survey of pesticide use is not the same as providing a science-based risk evaluation of use and exposure under prevailing conditions in the country, and recommended setting aside the Mozambique FRA.

Pesticide Action Network (PAN) cited the CRC Handbook example of the Jamaican notification on aldicarb as relevant to the Mozambique FRA, noted that the survey has already been accepted by the CRC for use on other Mozambique FRAs, agreed that the survey makes clear that lack of PPE is a major consideration in Mozambique, and argued the fact that chlorfenvinphos is or is not classified as a HHP is not relevant for the Rotterdam Convention.

Noting consensus among members that Norway's FRA meets all criteria, Chair Gwayi tasked a contact group chaired by Ormond, with Maillefer as drafter, to work with the Secretariat in preparing a draft rationale on the Norwegian FRA. She also mandated the group to further discuss whether the Mozambique FRA meets Convention criteria and, if the group decides that the FRA does, to draft a rationale for it.

The contact group met from Monday through Wednesday. On Monday, the group discussed members' concerns regarding three issues involving Mozambique's FRA:

- Mozambique chose to regulate chlorfenvinphos because it is "close to" WHO class 1b;
- Chlorfenvinphos is registered as a veterinary product in Mozambique; and
- Questions about whether chlorfenvinphos was imported into Mozambique during the period that the pesticide use survey was undertaken, so the survey data would be relevant.

Contact group drafter Maillefer led the discussion among members addressing all three points. At the end of the discussion, group Chair Ormond asked to confirm that all members had their concerns addressed and were satisfied that the Mozambique notification met all Convention criteria. No member objected.

Ormond reported to plenary on Tuesday morning that the contact group reached agreement that all criteria has been met, so Chair Gwayi tasked the group to develop with a draft rationale for both the Norwegian and Mozambique notifications. Noting the requisite two notifications from two PIC regions to proceed to the next step in the process, the Committee asked the Secretariat to begin drafting the rationale.

On Tuesday the contact group edited the portion of the draft rationale pertaining the Norwegian FRA notification, making minor editorial changes. On Wednesday the group addressed the draft rationale portion pertaining to the Mozambique notification (UNEP/FAO/RC/CRC.18/CRP.27). Apart from editorial changes, participants focused on revising the text to clarify passages regarding criterion b(iii) that describe how chlorfenvinphos was defined by Mozambique as "being close to" an HHP. Due to the opposition of one member, supported by several observers, the text in the draft rationale declaring criterion b(iii) to have been met was bracketed. The member said he wished to "harmonize" the approach with that taken regarding criterion b(iii) in Mozambique's FRA notification on carbaryl.

During Thursday's plenary discussion of the contact group outcome, Bart said he was not comfortable making a decision to remove the brackets in the draft rationale on Mozambique's

FRA, since Mozambique used the same information for their notifications of other chemicals on which the Committee had yet to take a decision. Observers from the US and Camara de Industria de Guatemala supported Bart's stance. Bodar recalled that the Committee recognized that the data in the Mozambique notification came from scientifically underpinned methods, fulfilling Convention criteria. Maillefer, supported by many other members, said the Mozambique notification clearly met all Convention criteria.

Chair Gwayi, noting the disagreement from Bart, proposed the Committee only decide on the rationale for Norway's notification, and defer action to on a draft rationale for Mozambique until CRC-19.

On Friday, the Secretariat presented the draft rationale on the Norwegian FRA notification (UNEP/FAO/RC/CRC.18/CRP.29), which the Committee approved as presented.

Final Decision: In the decision (UNEP/FAO/RC/CRC.18/CRP.28), the CRC:

- concludes that the notification of FRA for chlorfenvinphos submitted by Norway meets the criteria set out in Annex II to the Convention;
- adopts the rationale for the Committee's conclusion set out in the annex to the decision; and
- notes that only one notification for chlorfenvinphos meets the criteria set out in Annex II to the Convention, so it will take no further action on the chemical at this time.

Review of a Notification of Final Regulatory Action for Methidathion: On Monday, the Secretariat introduced the relevant documents for notifications from Mozambique, Türkiye and Uruguay ([UNEP/FAO/RC/CRC.18/9](#); [UNEP/FAO/RC/CRC.17/INF/13](#); [UNEP/FAO/RC/CRC.18/INF/18](#); and [UNEP/FAO/RC/CRC.17/INF/14](#)).

Mirijam Seng, assuming the role of drafter for intersessional Task Group 4 since the end of the term of the original drafter, Mara Curaba, presented the Task Group's report. She noted that CRC-17 had considered the notifications from Mozambique and Uruguay but had not decided if they met all criteria. Since then, another notification had been submitted by Türkiye. She reported the group determined the notification from Uruguay met all Convention criteria, but the one from Türkiye failed to meet criterion (b) as a whole because it does not establish that the FRA has been taken as a consequence of a risk evaluation. She also noted that the notification from Mozambique was discussed at CRC-17, but no conclusion was reached as to whether the general pesticide use survey carried out in Mozambique had generated sufficient chemical-specific data to meet criterion b(iii).

Members supported the Task Group's conclusions about the notification from Türkiye.

On Uruguay, Bodar noted Uruguay had not responded to the Committee's questions about methodology used in its risk evaluation. Seng responded that Uruguay had only provided additional information on input parameters and acknowledged that some members felt that was not sufficient.

Several members disagreed with the Task Group's conclusions, reiterating concerns raised at CRC-17 about Uruguay's use of Environmental Impact Quotients (EIQ). Bart observed that the EIQ was a comparative tool meant for helping farmers with integrated pest management, but not as the basis for risk assessment. He also

noted that Uruguay had failed to indicate what it considered to be an acceptable EIQ threshold. Observers from the US, Camara de Industria de Guatemala and CropLife agreed, and suggested that the unexplained use of EIQ in reaching Uruguay's regulatory decision meant criterion b(iii) was not met. PAN countered that Uruguay was within its rights to use EIQs as a regulatory tool, and FAO guidance on EIQs suggested such use was appropriate. The observer from the US, noting that EIQs had come up before, suggested the topic could be added to the CRC Handbook.

Regarding Mozambique's notification, Helbig, Abbas, Ormond, Bodar, Stefanovic, Pu and Azhar expressed support for the Task Group's conclusions. Bart questioned whether methidathion can be considered covered by Mozambique's HHP policy, since Mozambique deemed it to be "close to HHP," and questioned whether Mozambique imported methidathion during the period the general use survey was conducted, so its data can be considered relevant.

The observer from the UK supported the Task Group's conclusions on Mozambique. The observer from CropLife, supported by the observer from Camara de Industria de Guatemala, reiterated its position expressed at CRC-17 that the Mozambique notification did not meet all Convention criteria.

Chair Gwayi tasked a contact group chaired by Suzana Stefanovic with Seng as drafter to discuss remaining concerns about the Mozambique notification. The group met Monday evening and reported back to Tuesday's plenary that all issues had been resolved, there was agreement that the notification met all Convention criteria, and the contact group also conducted a paragraph-by-paragraph review of a draft rationale (UNEP/FAO/RC/CRC.18/CRP.17).

On Thursday, the full Committee considered the draft rationale. Bart stated that he would like to have more information from Mozambique so that he can make a more informed decision, recalling the Committee is reviewing a notification from Mozambique for another substance that used the same procedure. Sinhaseni asked for more time to consider the draft, noting she is a new member, English is not her native language, and the meeting "moves very fast." The Secretariat reminded members that the Committee had decided on Tuesday that the notification had met the criteria of the Convention and therefore sent the proceedings to a contact group to draft a rationale.

On Thursday morning Chair Gwayi suspended plenary and announced a "members only" informal consultation that afternoon to discuss concerns regarding the Mozambique notifications on methidathion, carbaryl, and thiodicarb. On Friday, after a discussion on carbaryl (see below) was unable to produce a breakthrough, the Committee decided to defer further deliberation on methidathion until CRC-19.

Review of a Notification of Final Regulatory Action for Carbon Tetrachloride: On Monday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/7](#); [UNEP/FAO/RC/CRC.18/INF/13](#); and [UNEP/FAO/RC/CRC.18/INF/14](#)).

Daniel William Ndiyo, Chair of intersessional Task Group 2, introduced the work of the Task Group on carbon tetrachloride. Christian Bart, assuming the role of drafter for intersessional Task Group 2 since the end of the term of the original drafter, Martin Lacroix, presented the group's report. He noted that CRC-1 determined a notification from Canada met all Convention

criteria. Bart reported the Task Group found that a new notification from Ecuador did not meet criterion (b) as a whole, because the group could not find evidence the FRA had been based on a risk evaluation, it lacked bridging information or a data review, and supporting documentation from an international database for pesticide risk assessments post-dated Ecuador's regulatory action by over 14 years.

Members intervened to support the conclusions of the Task Group. Noting general agreement among members that the Ecuadorian notification does not meet all Convention criteria, Chair Gwayi said no further action will be taken on this chemical at this time.

Review of a Notification of Final Regulatory Action for Carbaryl: On Tuesday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/6](#); [UNEP/FAO/RC/CRC.18/INF/10](#); [UNEP/FAO/RC/CRC.18/INF/11](#); and [UNEP/FAO/RC/CRC.18/INF/12](#)), while noting that CRC-4 had determined that an EU notification on this chemical had met all Convention criteria.

Hassan Azhar, Chair of the intersessional Task Group 1, presented the group's report on carbaryl. He noted that:

- the FRA notification from Bosnia and Herzegovina did not meet criterion b(iii);
- the FRA notification from Türkiye did not meet multiple criteria; and
- the FRA notification from Mozambique meets all criteria except b(iii), on which there is a difference of opinion among members.

Members who intervened supported Task Group's conclusions on the FRA from Bosnia and Herzegovina.

Regarding the FRA from Türkiye, while there was general support for the Task Group's conclusions, Seng, supported by Maillefer, indicated inconsistency within group's conclusions on b(iii) with those involving similar notifications from Türkiye on other chemicals. The observer from Camara de Industria de Guatemala concurred about the inconsistency regarding criterion b(iii) and noted there is also an inconsistency regarding the conclusion on criterion (a), that the FRA should be taken in order to protect human health or the environment.

As for Mozambique's FRA, Seng, Maillefer, Helbig and Matewe said criterion (b)(iii) was clearly met. Bodar suggested that bridging information from the US Environmental Protection Agency (EPA) could be used to strengthen the case that the FRA satisfies criterion b(iii). Abbas, Amichand, Matewe and Pinas supported using the bridging information.

Bart suggested that what members are saying is that Mozambique's notification is missing some clarifying information to link its survey results to the risks identified.

Li, supported by Sinhaseni, said it was clear Mozambique's notification did not meet all criteria since the Convention requires a risk evaluation, not just a hazard evaluation.

The observer from Camara de Industria de Guatemala said criterion b(iii) was clearly not met. The observer from the US said using US data as bridging information is fine when a notifying party does so in a notification, but not when it is missing in the notification and is later added by members at the CRC. Observers from Norway and PAN supported the use of bridging information. The observer from the UK said criterion b(iii) was met.

Regarding Mozambique's FRA, the Chair of the Committee established a contact group, chaired by Azhar with Escriva as drafter, to discuss whether Mozambique's notification meets all criteria, and to consider harmonizing the approach to criteria (a) and b(iii) taken in the notification from Türkiye on carbaryl vis-à-vis their FRA notifications on other chemicals.

When the contact group met Tuesday afternoon, several members reiterated their belief that all criteria had been met by the Mozambique notification, while a few expressed uncertainty about meeting the b(iii) criterion. One member urged seeking further information from Mozambique specific to carbaryl.

On Thursday morning, Chair Gwayi suspended plenary and announced a "members only" informal consultation that afternoon to discuss in detail concerns in common regarding the Mozambique notifications on methidathion, carbaryl, and thiodicarb.

On Friday, Chair Gwayi reported that the informal consultation had resulted in a "frank and robust" discussion and enabled an exchange of views that may have clarified matters for many members. She requested the Secretariat to display on screen a passage from Mozambique's notification stating that the ban on carbaryl "was decided due to its toxic nature and hazardous properties which combined with improper use due to local specific conditions can damage human and animal health." She reported that this passage, which some members may not have noticed in the notification, has led to a decision that criterion b(iii) has not been met.

Helbig pointed to a passage in the supporting documentation as well, while Abbas, Ech-Chayeb and Matewe said the CRC Handbook suggests Mozambique's notification would meet criterion b(iii). Escriva urged considering the notification and all its supporting documentation as a single package. He also warned the CRC cannot ask all notifications to be based on a risk assessment when the Convention explicitly refers to a risk evaluation.

Bart said the linkage is not explicit in Mozambique's notification, and without such an explicit link, he could not support a determination that criterion b(iii) is met. Sinhaseni pointed out that CRC-17 had also raised many questions about this notification. Sinhaseni, Li, and Pu supported Bart in his quest for more documentation from Mozambique.

Hassan, Bodar, Pinas, Ech-Chayeb, Seng, Dipane, Seck, Ormond, Amichand, Ndiyo, Ali, Birame, and Matewe said it was clear that b(iii) has been met.

Chair Gwayi told members that:

- under the Rotterdam Convention, a country has to do a risk evaluation, not a risk assessment;
- the CRC is not meant to prescribe or set standards for national risk evaluations;
- risk assessments are a plus when they are part of a submission to the CRC, but they are not a prerequisite or requirement for a successful FRA notification;
- the CRC judges a risk evaluation only through whatever information is submitted by the notifying country;
- it is not the CRC's job to judge one country's notification versus another's; and
- members should always remain patient and cordial with each other.

The observer from PAN said she had attended 14 CRCs and had seen many notifications go forward with far less documentation than what Mozambique has provided on carbaryl. She professed astonishment that some cannot see the link between the evaluation and the regulatory action. She also pointed to applicable precedents already included in the Handbook. She warned members to think very carefully about the message it sends when a notification so clearly meets the criteria and members fail to adhere to what the Convention says.

The observer from Canada, a former CRC member, agreed that the proper focus for the Committee is risk evaluation, and that members should consider what is in the documentation package as a whole, not necessarily only what is included in the regulatory action itself. He noted what some new members are asking for is patience, and they are only saying that they are uncomfortable moving on this notification at this time.

Pu said she had studied all the Mozambique submissions and still had questions before she could take a position on some of the notifications.

The Committee, noting lack of consensus on the Mozambique notification on carbaryl, deferred action until CRC-19.

Review of a Notification of Final Regulatory Action for Paraquat: On Tuesday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/13](#); [UNEP/FAO/RC/CRC.18/INF/28](#); and [UNEP/FAO/RC/CRC.18/INF/29](#)).

Intersessional Task Group 4 drafter Jürgen Helbig presented the group's report on paraquat, reporting that the group had found that both the Malaysia and Mozambique notifications met all Convention criteria.

Members intervening expressed support for the Task Group's conclusions regarding Malaysia's notification.

Many members also supported the Task Group's conclusions on Mozambique's notification, several citing the utility of the detailed explanation provided in supporting documentation of the study underpinning the risk evaluation. Acevedo González dissented, saying insufficient data had been provided for a proper risk evaluation. Observers from Argentina, Guatemala, Agrocare Latinoamerica, and CropLife also opposed the Task Group's conclusions on the grounds that criterion b(iii) had not been met. The observer from Camara de Industria de Guatemala called for more transparency in the Committee's work in assessing FRAs.

Chair Gwayi noted general agreement that the notification from Malaysia meets all relevant criteria and proposed to establish a contact group, chaired by Stefanovic with Helbig as drafter, to further discuss the notification from Mozambique and develop a draft rationale for the notification based on comments from participants. Meeting that evening, the contact group discussed and agreed Mozambique's notification met all criteria and edited a draft rationale on both the Malaysia and Mozambique notifications.

On Thursday, the Secretariat presented the draft rationale on the notifications by Malaysia and Mozambique (UNEP/FAO/RC/CRC.18/CRP.21), which the Committee approved as presented.

Final Decision: In the decision (UNEP/FAO/RC/CRC.18/CRP.25), the CRC:

- concludes that the notifications of FRA for paraquat submitted by Malaysia and Mozambique meet the criteria set out in Annex II to the Convention;

- adopts the rationale for the Committee's conclusion set out in the annex to the decision;
- recommends, in accordance with paragraph 6 of Article 5 of the Convention, that the COP should list paraquat in Annex III to the Convention as a pesticide; and
- decides to prepare a draft DGD for paraquat.

Review of a Notification of Final Regulatory Action for Thiodicarb: On Tuesday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/14](#); [UNEP/FAO/RC/CRC.17/INF/20](#); and [UNEP/FAO/RC/CRC.18/INF/30](#)), noting that CRC-17 had been unable to reach consensus on whether Mozambique's notification met all Convention criteria, but nonetheless had prepared a draft rationale for consideration at CRC-18.

Jonah Ormond, Chair of intersessional Task Group 3, introduced the work of the Task Group on thiodicarb. Sarah Maillefer, assuming the role of drafter since the end of the term of the original drafter, Kristine Kazerovska, presented the group's report. She said that since Türkiye's notification was not based on a risk or hazard evaluation and offered no exposure data or bridging information on risk evaluations performed in other countries, the Task Group had concluded that criterion b(iii) was not met. Maillefer noted CRC-17 decided Mozambique's notification had met all criteria except b(iii), on which no conclusion had been reached. Even so, CRC-17 had drafted a rationale but did not adopt it.

Several members intervened to support the Task Group's conclusions regarding Türkiye. They split regarding Mozambique, with Helbig, Seng, Escriva, Pinas, Amichand and Abbas saying the notification met criterion b(iii). Bart expressed doubts that b(iii) had been met. Observers from the US and Guatemala asserted the notification did not satisfy criterion b(iii), while Camara de Industria de Guatemala said Mozambique did not import thiodicarb during the general pesticide use survey period, so the survey data could not be used.

Chair Gwayi tasked a contact group chaired by Ormond with Maillefer as drafter to further discuss the Mozambique notification, and if it found that the notification met all the criteria, to develop a draft rationale based on the one drafted during CRC-17 ([UNEP/FAO/RC/CRC.17/INF/35](#)). When the contact group met Wednesday evening, several members reiterated their belief that all criteria had been met by the Mozambique notification, while a few expressed uncertainty about b(iii). One urged seeking further specific information from Mozambique during the intersessional period.

On Thursday morning, Chair Gwayi suspended plenary and announced a "members only" informal consultation that afternoon to discuss in detail concerns in common regarding the Mozambique notifications on methidathion, carbaryl, and thiodicarb. On Friday, after a plenary discussion on carbaryl (see above) was unable to produce a breakthrough, the Committee decided to defer further deliberation on thiodicarb until CRC-19.

Review of a Notification of Final Regulatory Action for Methyl Bromide: On Wednesday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/10](#); [UNEP/FAO/RC/CRC.18/INF/19](#); [UNEP/FAO/RC/CRC.18/INF/20](#); and [UNEP/FAO/RC/CRC.18/INF/21](#)).

Jonah Ormond, Chair of intersessional Task Group 3, introduced the work of the Task Group on methyl bromide. Sarah Maillefer, assuming the role of drafter since the end of the term of the

original drafter, Kristine Kazerovska, presented the group's report. She noted that the first notification from the Netherlands on this chemical had been addressed at CRC-1 and reported that the Task Group determined that the new notification from Colombia met all Convention criteria, while the notification from Indonesia did not meet criterion b(iii).

All members who intervened supported the Task Group conclusions regarding the Colombian and Indonesian notifications. The observer from the US agreed that Colombia provided a significant amount of data in its notification, but noted:

- the notification came 15 years after the regulatory action in question, well past the 90 days mentioned in the Convention; and
- the chemical is heavily restricted and subject to a notification regime under the Montreal Protocol on ozone depleting substances, so listing it under the Rotterdam Convention may impose another obligation with little value added in terms of restricting trade in the chemical.

Chair Gwayi responded that this is not the first time a party has notified past the 90-day period. She recalled that in a prior case, advice was sought from the legal adviser, and the response was that while the language in the Convention says notifications should be submitted within 90 days of the action being taken, nothing in the Convention text prohibits notifying later. Gwayi also noted that while the Montreal Protocol restricts the substance, it does allow its use for quarantine and pre-shipment and for certain "critical use exemptions," so the chemical is still in circulation.

The observer from Norway agreed that meeting a 90-day deadline is difficult even for developed countries and suggested perhaps this issue should be raised with the Rotterdam Convention's new Compliance Committee.

Noting general agreement that the Colombia notification meets all criteria, Chair Gwayi tasked the Secretariat, in consultation with the Task Group chair and drafter, to draft a rationale and discuss it in a contact group. Considering that with the acceptance of the Colombian notification, there are now two notifications from two PIC regions, she proposed that they begin drafting a DGD.

On Friday morning, the Secretariat presented the draft rationale on the Colombian notification (UNEP/FAO/RC/CRC.18/CRP.26). The Committee adopted the rationale as presented.

Final Decision: In the decision (UNEP/FAO/RC/CRC.18/CRP.24), the CRC:

- concludes that the notification of FRA for methyl bromide submitted by Colombia meets the criteria set out in Annex II to the Convention;
- adopts the rationale for the Committee's conclusion set out in the annex to the decision;
- recommends, in accordance with paragraph 6 of Article 5 of the Convention, that the COP should list methyl bromide in Annex III to the Convention as a pesticide; and
- decides to prepare a draft DGD for methyl bromide.

Review of a Notification of Final Regulatory Action for Methyl Parathion: On Wednesday, the Secretariat introduced the relevant documents regarding FRA notifications from China, Indonesia and Uruguay ([UNEP/FAO/RC/CRC.18/11](#); [UNEP/FAO/RC/CRC.18/INF/22](#); [UNEP/FAO/RC/CRC.18/INF/23](#); and [UNEP/FAO/RC/CRC.18/INF/24](#)), which follow an EU FRA notification

determined by CRC-1 to have met all Convention criteria ([UNEP/FAO/RC/CRC.17/INF/17](#)).

Mirijam Seng, assuming the role of drafter for intersessional Task Group 4 since the end of the term of the original drafter, Mara Curaba, presented the group's report on methyl parathion. She noted that:

- the FRA notification from China does not meet criterion (b) as a whole, because it does not establish that the FRA has been taken as a consequence of a risk evaluation, nor criterion c(iii)—whether the considerations that led to the FRA being taken are applicable only in a limited geographical area or in other limited circumstances;
- the FRA notification from Uruguay was found to meet all criteria except c(iv), evidence of ongoing trade, determination for which remains "open"; and
- the FRA notification from Indonesia was found not to meet criteria (b) as a whole.

Regarding the FRA notifications from China and Indonesia, all members intervening supported the Task Group's conclusions. As for Uruguay, members decided that criterion c(iv) was met, but contrary to the Task Group determination, criterion b(iii) was not met. Members disagreed with Uruguay's use of EIQs, with one stating that this method "sacrifices accuracy for specificity."

Chair Gwayi, noting none of the new notifications meet all the Convention criteria, said no further action will be taken on this chemical at this time.

Review of a Notification of Final Regulatory Action for Mirex: On Wednesday, the Secretariat introduced the relevant documents ([UNEP/FAO/RC/CRC.18/12](#); [UNEP/FAO/RC/CRC.18/INF/25](#); and [UNEP/FAO/RC/CRC.18/INF/26](#)).

Daniel William Ndiyo, Chair of intersessional Task Group 2, introduced the work of the Task Group on mirex. Christian Bart, assuming the role of drafter for intersessional Task Group 2 since the end of the term of the original drafter, Martin Lacroix, presented the group's report. He noted that CRC-13 had decided a notification from Canada met all Convention criteria. Bart reported the Task Group found that Ecuador's notification did not meet criterion (b) as a whole, because the group could not find evidence that the FRA had been based on a risk evaluation and it lacked bridging information. He said the group also determined that Indonesia's notification did not meet criterion (b) as a whole.

Noting general agreement among members that the Ecuadorian and Indonesian notifications do not meet all Convention criteria, Chair Gwayi said no further action will be taken on this chemical at this time.

Review of a Notification of Final Regulatory Action for Amitrole: On Wednesday, the Secretariat introduced the relevant documents regarding notifications from Ecuador and one from the EU previously vetted by CRC-15 ([UNEP/FAO/RC/CRC.18/5](#); [UNEP/FAO/RC/CRC.18/INF/8](#); and [UNEP/FAO/RC/CRC.18/INF/9](#)).

Hassan Azhar, Chair of intersessional Task Group 1, introduced the work of the Task Group on amitrole. Carles Escrivà, assuming the role of drafter since the end of the term of the original drafter, Timo Seppälä, presented the group's report. He reported the group determined the notification did not meet criterion (b) as a whole.

Noting general agreement among members that the Ecuadorian notification does not meet all Convention criteria, Chair Gwayi said no further action will be taken on this chemical at this time.

Venue and Dates for CRC-19

On Friday, the Secretariat outlined the plan for CRC-19 to be held at FAO headquarters in Rome, Italy for four days in October 2023. He noted that if COVID-19 results in new restrictions, the meeting could be conducted online.

Chair Gwayi proposed that CRC-19 be held for five days from 2-6 October 2023, given the increasing backlog of FRAs submitted by parties. The Committee agreed to the Chair's proposal.

Other Matters

Activities to Facilitate Effective Participation in the Work of the CRC: On Friday, the Secretariat reported on plans to hold a training workshop from 13-14 July 2023 for Committee members. She also highlighted other resources offered by the Secretariat, including online briefings and webinars, the [CRC Handbook and CRC Pocket Guide](#) and a self-assessment quiz designed for new members aimed at supporting their effective participation in CRC meetings.

Seng, Ndiyo and Hassan urged more face-to-face orientation and training sessions for members. The observer from Canada, a former CRC member, urged members to take advantage of the online tools that became popular during the COVID pandemic to engage other members and exchange information regularly between CRC sessions, mentioning that he had done so many times during the pandemic.

Scheduled Intersessional Work: Noting the large number of FRAs mounting in the CRC queue, the Secretariat said it would consult with the Bureau about creating a workplan for the Task Groups to review FRAs intersessionally, perhaps beginning in January 2023 with a view to completing the reviews by May 2023. The Secretariat promised to communicate the plan to members in a timely manner once it has consulted the Bureau.

Adoption of the Report and Closure of the Meeting

On Friday, the Committee adopted the report of its meeting (UNEP/FAO/RC/CRC.18/L.1) with only minor editorial changes.

Carlos Martin-Novella commended members on their week's work, both in terms of quantity and quality, declaring "it's difficult to remember a group of members more engaged than this one." He commented that by the end of the week the group started acting like a team and predicted they will be even more productive at CRC-19.

Christine Fuell praised CRC-18 for producing two DGDs and reviewing 10 FRAs in the time allotted, in a manner that emphasized consensus based on professional and respectful exchanges of divergent opinions. She also thanked observers for the added value they brought to many agenda items.

Chair Gwayi hailed the "robust and constructive" engagement of members at CRC-18. She lamented that some items were deferred to CRC-19, but said what matters is to remain focused, committed and "to remind ourselves why we participate in the Committee and what the Convention is all about." She cautioned that the work of CRC-19 has to start in earnest soon, since there will be more work for CRC-19 to do than there was for CRC-18.

Chair Gwayi gavelled the meeting closed at 12:24 pm.

A Brief Analysis of CRC-18

Straight As a Paraquat

Some chemical substances are harmful to human health and the environment but are not regulated in the same way in all countries. The Chemical Review Committee (CRC) process is relatively straightforward: countries identify in a notification to Rotterdam Convention parties a harmful substance that they believe should require prior informed consent (PIC) before being traded overseas, and, if the Committee considers this identification meets the necessary technical criteria set out in the Convention, they recommend that the Conference of the Parties (COP) adopt a decision subjecting the substance to the PIC procedure for all trade among parties. This process is framed within specific technical parameters, which, even if members know if the substance in the country's notification is harmful or not, means they have to limit themselves to just evaluating if the country has followed the right procedures to formulate their notification to the CRC.

While on paper this may all appear straightforward, in practice it can be less so. This brief analysis looks at how the 18th meeting of the CRC illustrates some of the challenges the Committee faces in adhering to its mandate.

Methidathion Exercises

The US Environmental Protection Agency has determined that the organophosphate insecticide/ acaricide methidathion poses serious risks to workers who mix, load and apply it to agricultural sites, and it poses acute and chronic risk to many birds, mammals and aquatic species. In the US, methidathion use is restricted to certified applicators who follow certain risk mitigation measures including certain personal protective equipment (PPE).

However, since the US is not a Rotterdam Convention party, information about such restrictions may not reach developing countries importing the pesticide unless two Rotterdam parties from different regions take final regulatory actions (FRAs) based on appropriate science and notify the Convention, which could lead to inclusion in the Convention's PIC procedure. At CRC-18 members considered three such notifications involving methidathion from Mozambique, Türkiye and Uruguay.

In this scenario, the main players are the Committee members who, in their capacity as experts, are asked to determine if a chemical substance is required to be labeled as such in international trade, and review the notifications submitted by countries on those substances. The review process includes the formation of a small "Task Group" that works intersessionally to scrutinize the notifications to determine if they fulfill the criteria set out in the Convention, including to determine if the country's FRA has been taken as a consequence of a risk evaluation using scientifically recognized methods.

This evaluation can include "bridging information" from a recognized authority such as the US Environmental Protection Agency or an international body such as the World Health Organization or the International Agency for Research on Cancer. The evaluation can also take into account that the notifying party, as is the case for some developing countries, does not have the capacity to enforce use of often expensive PPE and other risk mitigation measures.

The Task Group reports back to the CRC so that the full Committee can deliberate and decide if a notification does or does not meet all Convention criteria. Historically, the CRC has usually accepted the Task Group's conclusions. But at CRC-18, this was not always the case. For example, CRC-18 members did not agree with the Task Force's finding that Uruguay's FRA notification met all Convention criteria; they disagreed that the use of Environmental Impact Quotients, a comparative tool originally intended for farmers practicing integrated pest management, constitutes an acceptable basis for a risk evaluation.

If the Committee agrees that all criteria have been met, a rationale is drafted, explaining to the COP why the notification in question should be used as one of the two that trigger a recommendation to subject the chemical to the PIC procedure. With two accepted notifications from two distinct regions as defined under the Convention, the Committee forwards to the COP a "decision guidance document" (DGD) laying out the case for listing the chemical. Not all recommendations made by the CRC are adopted by the COP. The COP, as a political entity representing the interests of parties, can and many times does take into account other considerations outside of the technical character of the Committee's recommendation, such as political and economic interests.

Terbufos Blow

To ensure transparency, observers are allowed to attend the Committee's regular meetings and express their views. These observers include other parties to the Rotterdam Convention, non-parties to the Convention, and other stakeholders, including non-governmental organizations and industry representatives. These observers can speak at meetings, but cannot participate in the Committee's formal decision-making. However, the engagement of observers at CRC-18, both inside the meeting room and in the corridors, was unusually active, so much so that—as noted by several participants—they visibly influenced several of the Committee's proceedings and decisions.

As a result, CRC-18 encountered some hiccups when several FRA notifications from Mozambique were contested by some members—mainly following arguments made earlier in the week by observers—because they deemed they lacked sufficient relevant information to determine if the chemicals can be listed in Annex III of the Convention.

Furthermore, some of the new members said they needed more time to review the information provided by the notifying party relating to the assessment that identified the respective chemicals as highly hazardous pesticides (HHPs). In response, experienced members repeatedly affirmed that the assessment made by Mozambique was clear and within the scope and precedents of the CRC.

Due to the pandemic, however, new members had less time to acquaint themselves with the relevant documentation and learn CRC procedures and precedents. They had to rely solely on online training, which, as many stated during the meeting, affected their preparation.

During an informal consultation on Thursday, in what Chair Noluzuko Gwayi called a "robust engagement," those new members were reportedly grateful to be given more time to review and discuss the notification of Mozambique and better understand

what constitutes a HHP as well as the difference between a risk assessment and a risk evaluation.

This latter topic surfaced often at CRC-18, since some new members and several observers consider more rigorous risk assessments to be a necessary condition for a FRA, even if the Convention only specifies a risk evaluation for accepting FRA notifications. If the advocates of more rigorous risk assessments succeed in getting such a shift in the CRC approach, far fewer FRA notifications would likely pass CRC review, and the only ones likely to do so would be those from those countries with the capacity and resources to conduct risk assessments and thoroughly document them—an outcome many Convention parties and CRC members do not want to see.

Amitrole Cocktail

During the first days of the meeting, observers such as CropLife, Camara de Indústria de Guatemala, Argentina, and the US were significantly more engaged in the discussions inside the chamber—as well as outside in the hallways—than many CRC members. Citing gaps and/or deficiencies in the information presented in the notifications, the observers effectively conveyed their concerns. Some new members echoed those concerns, leading the CRC to defer action on several chemicals. Veteran members, as well as observers from the Pesticide Action Network, countered these points, stating the respective notifications had credible foundations and were in line with past CRC practice, even citing examples from the CRC Handbook.

Both positions, however, can be linked to political and economic interests. On the one hand, the chemicals under discussion can be harmful to human health and the environment. On the other hand, their listing could open a window for global bans, since countries can use the chemicals listed under the Rotterdam Convention as a "cheat sheet" to target chemicals for complete bans or severe restrictions. This, in turn, leads to the argument that the PIC listing represents a *de facto* obstacle for food security in the developing world, as some observers stated during the meeting: if pesticides are submitted to procedures that makes them more expensive, prohibited, or replaced by less toxic but more expensive alternatives, this could affect the cost of food in countries where this would have a significant impact.

Nevertheless, the mandate of the CRC—as well as the Rotterdam Convention—is clear, and the space for articulating these positions comes at a later time, at the COP. The CRC is a scientific and technical advisory body comprised of government-designated experts in chemicals management that acts within a mandate that has a determined scope. In other words, political and economic issues should not be taken into account by the CRC. Those issues fall under the remit of the COP, which is the body that actually decides whether to list the chemicals.

The CRC process is deliberately rigorous so that experts can review each chemical before making any recommendation to the COP. But if the science gets subsumed by political and economic issues, some CRC members and observers have expressed concern that this may doom the effectiveness of the Rotterdam Convention and reduce the ability of governments to give their prior informed consent before receiving future shipments of hazardous chemicals and pesticides. As with many international processes involving

environmental issues, human and environmental health may hang in the balance together with economic interests—especially those of the developing world.

Upcoming Meetings

POPRC-18: The eighteenth meeting of the Persistent Organic Pollutants Review Committee to the Stockholm Convention will continue its review of the industrial chemicals Dechlorane Plus, UV-328, chlorinated paraffins with carbon chain lengths in the range C14-C17 and chlorination levels at or exceeding 45% chlorine by weight, long-chain perfluorocarboxylic acids, their salts and compounds, and the pesticide chlorpyrifos. The POPRC will also consider draft reports related to exemptions for specific listed substances and alternatives to perfluorooctane sulfonic acid, as well as a draft document on long-range environmental transport. **dates:** 26-30 September 2022 **location:** Rome, Italy **www:** pops.int/

OEWG1 on a Science-Policy Panel to Contribute Further to the Sound Management of Chemicals and Waste and to Prevent Pollution: The first part of the first session of the *ad hoc* open-ended working group (OEWG) on a science-policy panel to contribute further to the sound management of chemicals and waste and to prevent pollution will address procedural matters, including the election of its Chair and Bureau, as well as the rules of procedures for the conduct of its work. The meeting will also allow Member States and observers the opportunity to deliver general statements on the establishment of the science-policy panel. **date:** 6 October 2022 **location:** Nairobi, Kenya and virtual **www:** unep.org/events/conference/oweg1-science-policy-panel-contribute-further-sound-management-chemicals-and

First meeting of the Rotterdam Convention Compliance Committee: The Committee is expected to consider its mandate related to specific submissions regarding party implementation and compliance and initiate its work on the review of systemic issues of general compliance based on the work programme for 2022-2023 adopted by the Conference of the Parties. It will also consider its draft 2024-2025 work programme. **dates:** 16-18 November 2022 **location:** Geneva, Switzerland **www:** pic.int/TheConvention/ComplianceCommittee/Meetings/CC1

Plastics INC-1: The Intergovernmental Negotiating Committee to develop an international legally binding instrument on plastic pollution, including in the marine environment, will hold its first substantive meeting. **dates:** 28 November - 2 December 2022 **location:** Punta del Este, Uruguay **www:** unep.org/events/conference/inter-governmental-negotiating-committee-meeting-inc-1

SAICM IP4.2: The resumed fourth meeting of the Intersessional Process for Considering the Strategic Approach to International Chemicals Management (SAICM) and the Sound Management of Chemicals and Waste Beyond 2020 (IP4.2) will continue negotiations on the post-2020 platform or instrument for the sound management of chemicals and waste. **dates:** TBC (first quarter 2023) **location:** TBC **www:** saicm.org/

OEWG13: The thirteenth meeting of the Open-ended Working Group to the Basel Convention will meet to discuss technical guidelines, including for plastic wastes and lead-acid batteries, and

legal issues such as the Annex IV proposals related to e-wastes, among other issues. **dates:** 21-23 February 2023 **location:** Geneva, Switzerland **www:** basel.int/

Basel, Rotterdam, and Stockholm Conventions COPs: The meeting will be comprised of Basel Convention COP16, Rotterdam Convention COP11, and Stockholm Convention COP11. **dates:** 1-12 May 2023 **location:** Geneva, Switzerland **www:** brsmeas.org/

ICCM5: SAICM's governing body, the International Conference on Chemicals Management (ICCM), is due to consider recommendations for a post-2020 platform or instrument for the sound management of chemicals and waste. **dates:** 25-29 September 2023 **location:** Bonn, Germany **www:** saicm.org/

CRC-19: The CRC is due to consider DGDs on methyl bromide and paraquat, draft rationales on chlorfenvinphos, carbaryl, methidathion, and thiodicarb, and examine FRAs on several other chemicals. **dates:** 2-6 October 2023 **location:** Rome, Italy **www:** pic.int/

For additional meetings, see sdg.iisd.org/

Glossary

COP	Conference of the Parties
CRC	Chemical Review Committee
DGD	Decision guidance document
EIQ	Environmental Impact Quotients
FAO	Food and Agricultural Organization of the UN
FRA	Final regulatory action
HHP	Highly hazardous pesticide
PAN	Pesticide Action Network
PIC	Prior informed consent
PPE	Personal protective equipment
WHO	World Health Organization