

Summary of the 20th 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: 17-20 September 2024

Global demand for pesticides continues to grow, although there are still gaps in the information available about their risks to human health and the environment. Unsafe management can compound these risks. The Chemical Review Committee (CRC) of the Rotterdam Convention has an important role to play in helping to fill these gaps by reviewing information from countries about their final regulatory actions related to chemicals and pesticide formulations.

At its twentieth meeting, the CRC reviewed a record 35 notifications of final regulatory action, as well as four proposals for listing severely hazardous pesticide formulations. The Committee adopted draft decision guidance documents for chlorpyrifos and mercury, and agreed that notifications on chlorpyrifos-methyl and paraquat meet the criteria to be listed in the Rotterdam Convention. The CRC will continue reviewing notifications on nine substances and three severely hazardous pesticide formulations (SHPF) at its next meeting. Given the difficulties and uncertainties in reviewing SHPF proposals, the CRC agreed to intersessional work to further compile its experiences with these proposals and review the information-gathering forms countries use to propose an SHPF to the Committee.

In completing these reviews, CRC members often encountered what some called “the realities” developing countries face in managing pesticides and chemicals more generally. At the same time, there is increased demand for the Committee’s work and its stringency as the Rotterdam Convention faces questions about its effectiveness.

CRC-20 convened face-to-face from 17-20 September 2024 at the headquarters of the Food and Agriculture Organization of the United Nations (FAO) in Rome, Italy. Over 200 people participated in this meeting, including 28 of the current 30 Committee members. Approximately 67 observers from 27 states, two observers from an international organization, and 90 representatives of 36 non-governmental and industry organizations attended.

The current members of the Committee are: Adam Barlow (Australia), Juergen Helbig (Austria), Stephen Sangster (Belize), Oarabile Serumola (Botswana), Christian Bart (Canada), Cangmin Li (China), Carles Escriva (Germany), Joseph Cantamanto Edmund (Ghana), Carlos Enrique Acevedo González (Guatemala), Suresh Amichand (Guyana), Amit Vashishtha (India), Yenny Meliana

(Indonesia), Ahmad Heidari (Iran), Giuseppe Granato (Italy), June Aluoch (Kenya), Judīte Dipāne (Latvia), Sidi Ould Aloueimine (Mauritania), Saida Ech-Chayeb (Morocco), Shankar Prasad Paudel (Nepal), Charles Bodar (Netherlands), Irene Sørvik Malme (Norway), Zaigham Abbas (Pakistan), Christian Sekomo Birame (Rwanda), Christian Sekomo Birame (Serbia), Noluzuko Gwayi (South Africa), Jeevani Prasadika Marasinghe (Sri Lanka), Victorine Augustine Pinas (Suriname), Palarp Sinhaseni (Thailand), Hasmath Ali (Trinidad and Tobago), and Daniel Ndiyo (Tanzania).

A Brief History of the CRC

Continued chemical production and trade growth increasingly prompt concerns about the potential risks posed by hazardous chemicals and pesticides to human health and the environment. The Global Chemicals Outlook II estimates that, between 2000 and 2017, the global chemical industry’s production capacity almost doubled, from about 1.2 to 2.3 billion tonnes. Production is also increasingly shifting to the Global South.

Developing countries are particularly vulnerable to these risks, as they often lack the infrastructure to monitor chemicals’ import and use. In response to these concerns, the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade was adopted in September 1998. It entered into force on 24 February 2004 and currently has 166 parties.

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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 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 to help ensure informed international trade. Based on the information provided, parties confirm whether they wish to receive shipments of chemicals listed in Annex III of the Convention. These decisions are shared among all parties, including those exporting these chemicals. Annex III of the Rotterdam Convention includes pesticides, industrial chemicals, and SHPFs.

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 review proposals for SHPFs against Annex IV of the Convention. Based on these reviews, the CRC develops recommendations for the Conference of the Parties (COP) to list such chemicals in Annex III, making them subject to the PIC procedure.

There are two ways to trigger the addition of new chemicals to Annex III. First, parties must notify the Secretariat when they adopt domestic regulations to ban or severely restrict a chemical for environmental or health reasons. When the CRC agrees that two notifications from two different PIC regions (Africa, Asia, Europe, Latin America and the Caribbean, Near East, North America, and Southwest Pacific) meet the criteria in Annex II, it can recommend listing the chemical in Annex III.

Second, 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. If it is found to meet the criteria, the CRC can recommend that it is listed in Annex III.

For each chemical and SHPF proposed for listing in Annex III of the Convention and subject to the PIC procedure, the CRC prepares a Decision Guidance Document (DGD). It sets out the scope of the chemical subject to the PIC procedure and contains basic information on the chemical, including its hazard classification, additional sources of information on the chemical, and information on possible alternatives. 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.

COP 9: In 2019, COP 9 voted to adopt a compliance mechanism, 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 notification is received from a second PIC region.

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 first met online in July 2021 to address 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 notifications on terbufos and iprodione meet the criteria for listing and to prepare DGDs 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: In September 2022, CRC 18 approved draft DGDs for terbufos and iprodione. The CRC reviewed notifications related to 10 chemicals, concluding that methyl bromide and paraquat notifications met the listing criteria.

COP 11: At the 2023 meeting, the COP agreed to list terbufos. It deferred its consideration of iprodione and the five legacy chemicals that the COP has not agreed on. A proposal to amend the Convention by creating a new annex for such chemicals was narrowly defeated in a vote. The COP agreed to intersessional work on the effectiveness of the Convention.

CRC-19: At its October 2023, meeting the CRC agreed to the draft DGDs for methyl bromide and paraquat and decided to forward them to the COP for its consideration. The Committee reviewed notifications related to 10 chemicals, agreeing that bromacil, chlorpyrifos, diarsenic pentaoxide, and mercury met the Annex II criteria. For both chlorpyrifos and mercury, there were approved notifications from additional PIC regions, and, therefore, the CRC agreed to develop draft DGDs.

CRC-20 Report

On Tuesday, 17 September 2024, CRC Chair Noluzuko Gwayi (South Africa), welcomed members and observers. She extended her appreciation to members and the Secretariat for the considerable intersessional work undertaken to prioritize and review the many FRA notifications received.

Co-Executive Secretary *ad interim* Christine Fuell, FAO, observed the record number of chemicals on the CRC agenda, which she cited as stemming from capacity-building, awareness-raising, and compliance-related activities. Observing most chemicals on the agenda are pesticides, she drew connections with the Sustainable Development Goals, which she noted are not on track to be met.

Co-Executive Secretary Rolph Payet lamented we live in a world polluted by chemicals and waste, particularly plastics. He underlined the importance of the CRC in supporting scientifically informed trade in hazardous chemicals.

Organizational Matters

On Tuesday, the CRC adopted the agenda ([UNEP/FAO/RC/CRC.20/1](#) and [Add.1](#)) and the organization of work ([INF/1](#) and [2](#)). Chair Gwayi recalled that CRC-19 agreed to handle the pesticides proposed by Mozambique together.

GUATEMALA relayed to members they sent a letter on 6 December 2023, regarding the ongoing discussion on the notifications from Mozambique. She recognized the importance of the Mozambican project but observed the lack of data and continued discussions about these pesticides. She called for ending consideration of these pesticides at this meeting if the CRC cannot agree the criteria are met.

The CRC took note of the rotation of membership ([INF/3/Rev.1](#)).

Technical Work

Consideration of DGDs: Chlorpyrifos: The Secretariat introduced the draft DGD ([UNEP/FAO/RC/CRC.20/3](#)) and comments and responses to it ([INF/4](#)), noting new submissions on chlorpyrifos under the notifications of the FRA agenda item will not affect the work on this agenda item. Many CRC members expressed support for the draft DGD.

An observer from BRAZIL reported on the ongoing toxicology re-evaluation of chlorpyrifos and welcomed the draft DGD.

Chair Gwayi requested the Secretariat to prepare a draft decision on this item.

On Thursday, CRC-20 adopted the draft decision.

Final Decision: In the decision ([UNEP/FAO/RC/CRC.20/CRP.11](#)), the CRC adopts the draft DGD for chlorpyrifos and forwards it, together with the related tabular summary of comments, to the COP for its consideration.

Mercury: On Tuesday, the Secretariat introduced the draft DGD ([UNEP/FAO/RC/CRC.20/4](#)) and the comments and responses ([INF/5](#)).

Victorine Pinas, Chair of the Task Group, presented the draft DGD, highlighting comments incorporated into the risk evaluation and waste management sections related to the Minamata Convention on Mercury. With Drafter Christian Bart she observed the challenges in summarizing the vast amount of information related to mercury.

CRC members expressed broad support for the draft DGD. An observer from BRAZIL supported the draft DGD and listing mercury in the Rotterdam Convention, noting its complementarity with the Minamata Convention.

Chair Gwayi requested the Secretariat to draft a decision.

On Thursday, CRC-20 adopted the draft decision as presented by the Secretariat.

Final Decision: In the decision ([UNEP/FAO/RC/CRC.20/CRP.12](#)), the CRC adopts the draft DGD for mercury and forwards 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 FRA and Proposals for SHPFs: On Tuesday, the Secretariat introduced the Bureau's report ([UNEP/FAO/RC/CRC.20/2](#)), information on trade ([INF/6](#)), and summary record of previously reviewed notifications of FRA ([INF/7](#)).

Bureau member Pinas outlined how the Bureau prioritized the large numbers of notifications received, reporting that the decision to establish intersessional work was based on their likelihood of meeting the criteria. She noted that notifications of FRA or proposals for SHPFs were therefore set aside. She added that the Committee would still need to review and decide on the notifications for which

there was no intersessional work, based on the Bureau's preliminary review. The CRC took note of the information.

Review of Notifications of FRA: Benzidine and its salts: On Thursday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.20/5](#)), supporting notification from Türkiye ([INF/8](#)) and previously reviewed notification from Canada ([INF/9](#)). She recalled that this notification did not undergo intersessional work and that the Bureau considered that criterion b(iii) was not met.

Members agreed with that assessment and no further action will be taken on this notification.

Chlorpyrifos: On Tuesday, the Secretariat introduced a notification for chlorpyrifos ([UNEP/FAO/RC/CRC.20/8](#)) and supporting documentation from Chile ([INF/12](#)) and notifications of chlorpyrifos from the EU, Malaysia, and Sri Lanka previously reviewed ([INF/13](#)). Chair Gwayi noted that Chile's new notification does not affect the CRC's consideration of the DGD. She reported that the Bureau considered the Chilean notification and it does not meet criterion b(iii) (risk evaluation). Agreeing with the Bureau, CRC members agreed no further action would be taken on this notification.

Chlorpyrifos-methyl: On Tuesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.20/9](#)) and supporting documentation provided by Chile ([INF/14](#)) and the EU ([INF/15/Rev.1](#)).

On the Chilean notification, Chair Gwayi noted the Bureau considered that the criteria had not been met. CRC members agreed with that conclusion and that no further action would be taken on this chemical based on this notification.

On the EU notification, Task Group Chair Saida Ech-Chayeb and Drafter Carlos Escriva relayed the group's findings, which concluded that the EU notification met all of the Annex II criteria. Many CRC members, supported by an observer from BRAZIL, agreed with this conclusion. Barlow, supported by an observer from NEW ZEALAND, suggested adding the hazard-related information presented in the pre-meetings by the EU to the draft rationale.

The CRC agreed to task a contact group on pesticide notifications to consider the EU notification and to draft a rationale, chaired by Ech-Chayeb.

On Thursday, the Secretariat introduced a draft rationale ([UNEP/FAO/RC/CRC.20/CRP.14](#)) and a draft decision on the EU's notification (CRP.13). Helbig proposed, supported by many other members, an editorial comment to properly reference the EU legislation in the draft rationale. The CRC then adopted the decision and rationale with the proposed edits.

Final Decision: In the decision ([UNEP/FAO/RC/CRC.20/CRP.13](#)), the CRC:

- concludes the notification of FRA for chlorpyrifos-methyl submitted by the EU meets the criteria set out in Annex II to the Convention;
- adopts the rationale for the conclusion set out in the annex to the present decision; and
- notes that, as only a notification of FRA from one PIC region meets the criteria set out in Annex II to the Convention, it will take no further action on the chemical at present.

Cyhexatin: On Thursday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.20/10](#)), supporting information from Türkiye ([INF/16](#)), and previously reviewed notification from Canada ([INF/17](#)). He noted that intersessional work was not conducted, and the Bureau considered that criterion b(ii) was not met.

Members agreed with this assessment and that no further action would be taken regarding this notification.

Dichlorvos: On Tuesday, the Secretariat presented notifications on dichlorvos by the EU, Malawi, and Serbia ([UNEP/FAO/RC/CRC.20/11](#)), and supporting information from the EU ([INF/18](#)), Malawi ([INF/19](#)), and Serbia ([INF/20](#)). He reported that the notifications from Malawi and Serbia did not undergo intersessional work and, based on the Bureau's assessment, both submissions do not meet criterion b(iii) since no risk evaluation was provided.

On Malawi's notification, many members agreed with the Bureau's findings.

PESTICIDE ACTION NETWORK (PAN) ASIA-PACIFIC underlined they believe criterion b(iii) was met, saying the notification includes all the necessary information to constitute an evaluation, like the availability of protective equipment in the immediate living quarters. They urged the CRC to reassess this submission, noting it would be a notification from a second PIC region with notification on dichlorvos.

On Serbia's notification, many CRC members and an observer from KENYA agreed with the Bureau that it does not meet criterion b(iii).

The CRC agreed that no further action would be taken on these notifications.

On the EU's notification, Ech-Chayeb and Escriva presented the task group's work on the EU's submission, reporting that it viewed all criteria as met.

Many CRC members supported the task group's findings. Barlow characterized the risk evaluation as inconclusive and requested more discussion on whether the notification meets criterion b(iii).

An observer from BRAZIL and PAN UK supported the task group's conclusion, with PAN UK noting that a risk evaluation, not risk assessment, is required for a notification to meet criterion b(iii).

Observers from CHINA, CANADA, and NEW ZEALAND echoed Barlow's concerns regarding the inconclusive risk evaluation results, especially on exposure, and stated that the issue will benefit from further discussion.

The CRC agreed to extend the mandate of the contact group on pesticide notifications to consider this notification.

On Thursday, the CRC agreed to defer its consideration of the EU notification and to seek further clarification from the EU, including on the risk evaluation involving prevailing conditions of use within the notifying party.

Dicofol: The Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.20/12](#)) and supporting documentation from Chile ([INF/21](#)), Peru ([INF/22](#)), Türkiye ([INF/23](#)), Switzerland ([INF/51](#)), and the previously reviewed EU notification ([INF/24](#)).

She said that the Swiss notification, by oversight, was not included in the task group's work.

Chair Gwayi proposed, and CRC members agreed, in light of time constraints and given there is no task group report on the Swiss notification, consideration of this agenda item, including all related notifications be deferred to CRC-21.

Hexachlorobenzene (HCB): On Tuesday, the Secretariat presented the notification submitted by Australia ([UNEP/FAO/RC/CRC.20/14](#)) and supporting documentation ([INF/26](#)) and a previously reviewed notification from Canada ([INF/27](#)).

Task Group Chair Pinas and Drafter Barlow presented the results of the task group's work, including that the following criteria were not met:

- b(iii) (risk evaluation);

- c(i) (if the FRA could lead to a significant decrease in the quantity of the chemical or its uses);
- c(ii) (if the FRA led to a substantial decrease in risk); and
- c(iv) (ongoing trade).

Many CRC members supported the task group's conclusions, noting the lack of data on exposure, environmental concentration, and the presence of HCB in Australia.

Escriva, citing the CRC's previous decision on mirex, noted while there is no information available on international trade, the Committee cannot conclude that trade is not taking place and, therefore, criterion c(iv) is met.

An observer from SWITZERLAND, commenting on c(i) and c(ii), noted that HCB has been banned in Australia and listed under the Stockholm Convention since 2004. They explained that the 2024 FRA is a continuation of 2004 regulatory action; therefore, the current submission meets criteria c(i) and c(ii).

An observer from CANADA questioned the added value of a Rotterdam Convention listing since HCB is already listed without exemptions under the Stockholm Convention, also requesting clarification on whether Australia submitted initial regulatory action in 2004 or 2019.

An observer from NEW ZEALAND, commenting on c(iv), noted that the exemptions for HCB under the Stockholm Convention have expired, meaning there is production or use. He stressed that c(iv) requires evidence of international trade, and since there is no evidence, the only possible conclusion is that the criterion is not met. Barlow, Sørvik Malme, and Sangster agreed, stating that the c(iv) criterion was not met.

Escriva reiterated that international trade cannot be excluded in this situation. Ndiyo clarified that the Stockholm Convention requires total elimination of HCB, and therefore, it cannot be available for international trade.

Chair Gwayi noted agreement among members that notification does not meet criteria b(iii), c(i) and c(ii), and all but one member agreed that it also does not meet criterion c(iv). She suggested reflecting the discussion in the meeting report. The CRC decided that no further action will be taken on this notification.

Paraquat and paraquat dichloride: On Tuesday, the Secretariat introduced notifications ([UNEP/FAO/RC/CRC.20/16](#)), supporting information submitted by Burkina Faso, Cabo Verde, Chad, Mali, Mauritania, Niger and Senegal (as part of the Comité Permanent Inter-États de Lutte contre la Sécheresse dans le Sahel, CILSS) ([INF/29](#)), Chile ([INF/30](#)), Togo ([INF/31](#)), and Türkiye ([INF/32](#)), and previously reviewed notifications from Malaysia and Mozambique ([INF/33](#)).

On the Chilean notification, the Bureau suggested that the submission does not meet criterion b(iii), particularly concerning information on actual, expected, or anticipated exposure under prevailing conditions.

CAMARA DE INDUSTRIA DE GUATEMALA noted the CRC's workload but, citing the rules of procedure, objected to the CRC's review of notifications without an intersessional task group report.

The CRC agreed no further action would be taken on this notification.

On Türkiye's notification, the Bureau suggested the submission does not meet criterion b(iii). The CRC agreed no further action would be taken on this notification.

On the CILSS and Togo notifications, Task Group Chair Ech-Chayeb and Drafter Bart presented the group's results, noting while the members agreed the CILSS submission meets all criteria, they could not agree whether Togo's submission meets criterion b(iii).

On the CILSS' notification, many CRC members supported the task group's report. On Togo's submission, Ndiyo and Barlow stated that criterion b(iii) was not met.

An observer from ARGENTINA stressed their support for science-based decision-making and rigorous risk assessments, stating the notification from CILSS does not meet criterion b(iii).

CAMARA DE INDUSTRIA DE GUATEMALA said further details are required, including how survey data was evaluated and how the conclusion for approval or non-approval for registration was reached. He also highlighted that no paraquat product was approved in CILSS countries at the time of the FRA. With CROPLIFE INTERNATIONAL, he stated that criterion b(iii) was not met.

PAN UK supported the conclusion that all criteria were met.

Chair Gwayi noted consensus among members that the CILSS' notification met all criteria.

On the notification from Togo, Sangster, supported by Marasinghe, cited an overall picture of use of paraquat provided by the information given and concluded that criterion b(iii) is met.

Helbig observed that Togo is a member of CILSS and that CILSS' work informed Togo's FRA. He said the notification contains information based on Togo's additional national-level work, and he concluded that if criterion b(iii) is met by the CILSS notification, then it should also be met by Togo's notification. Amichand, Pinas, Bodar, Sinhaseni, Ndiyo, and Edmund agreed that criterion b(iii) was met because Togo is a member of CILSS. Barlow and Bart expressed interest in discussing the approach to use the CILSS notification as bridging information.

The CRC tasked the contact group on pesticide notifications, chaired by Ech-Chayeb, to discuss the notification from Togo related to criterion b(iii) and, if it agrees that the criteria are met, to develop a draft rationale. The contact group was also mandated to develop a draft rationale for its decision on the CILSS notification.

On Thursday, Chair Gwayi announced that the contact group reached an agreement that Togo's notification met criterion b(iii), and the Secretariat introduced the draft rationale and draft decision on the notifications by CILSS and Togo. The CRC adopted the decision and rationale with editorial amendments proposed by Helbig and Edmund.

Final Decision: In its decision (UNEP/FAO/RC/CRC.20/CRP.16), the CRC:

- concludes the notifications of FRA for paraquat submitted by CILSS (Burkina Faso, Cabo Verde, Chad, Mali, Mauritania, Niger and Senegal) and Togo meet the criteria set out in Annex II;
- adopts the rationale for the conclusion;
- recalls its decision CRC-18/4, whereby it recommended, based on notifications of FRA for paraquat submitted by Malaysia and Mozambique, that the COP list paraquat in Annex III as a pesticide, and its decision CRC-19/2, whereby it adopted the DGD for that chemical and decided to forward it to the COP for its consideration; and
- decides that, because COP 12 will consider the recommendation by the CRC and the DGD, the Committee will take no further action on the additional notifications submitted by CILSS.

Pentachlorobenzene: On Tuesday, the Secretariat introduced Australia's notification of FRA (UNEP/FAO/RC/CRC.20/17), supporting documentation (INF/34), and a previously reviewed notification from Canada (INF/35).

Task Group Chair Pinas and Drafter Barlow presented the group's work. They reported that the notification did not meet criterion b(iii), noting insufficient information on exposure under prevailing conditions of use. They also said that the notification did not meet the following criteria, noting the chemical's listing in Stockholm Convention Annexes A and C:

- c(i) (if the FRA could lead to a significant decrease in the quantity of the chemical or its uses);
- c(ii) (if the FRA led to a substantial decrease in risk); and
- c(iv) (ongoing trade).

The CRC agreed the notification did not meet all the criteria and no further action would be taken on this chemical.

Phenthoate: On Thursday, the Secretariat introduced the notifications (UNEP/FAO/RC/CRC.20/18) and supporting documentation from Malaysia (INF/36) and Türkiye (INF/37). He noted the Bureau determined these notifications do not meet criterion b(iii). He said the Bureau noted the similarity between Malaysia's notification for this pesticide and profenofos, on which there is a task group report.

On the notification from Türkiye, CRC members agreed with the Bureau's preliminary review and no further action would be taken on this notification.

On Malaysia's notification, Bodar, Helbig, Ech-Chayeb, and Amichand noted the CRC will request further information on profenofos and suggested the same specific questions be asked for this notification. Helbig viewed criterion b(iii) as met.

Barlow, Ali, Abbas, Bart, Li, Vashishtha, Sinhaseni, and Ndiyo agreed with the Bureau that b(iii) was not met. Barlow, Bart, Sinhaseni, and Ndiyo expressed openness to ask the same questions for this notification as for profenofos. Sangster said further discussion is required.

CROPLIFE INTERNATIONAL underlined that maximum residue limits (MRLs) are a trade standard and an exceedance does not indicate health or environmental risk. She also recalled that Malaysia said no risk evaluation was conducted.

PAN UK stated that MRLs are not solely a trade standard, and the notification states they were used to protect consumers. He requested that a task group develop the questions for transparency.

The CRC agreed to defer its consideration of this chemical and request the same additional information requested for profenofos, namely, a copy of the residue monitoring study and supporting documents, which types of MRLs were used, and how the observed incidents of MRL exceedances were evaluated to assess the risks posed to consumers and associated health risks with their use in crops.

Profenofos: On Tuesday, the Secretariat introduced the notifications (UNEP/FAO/RC/CRC.20/19) and supporting documentation from Malaysia (INF/38) and Türkiye (INF/39).

On the Türkiye notification, Chair Gwayi noted that the Bureau did not consider criterion b(iii) to be met. Many CRC members agreed, supported by an observer from ARGENTINA and CAMARA DE INDUSTRIA DE GUATEMALA. Members agreed no further action would be taken on this notification.

On Malaysia's notification, Task Group Chair Ech-Chayeb and Drafter Bart reported the group's findings that all Annex II criteria were met, but underlined criterion b(iii) needs additional discussion. They said the notification states that a risk evaluation was not conducted, but it provides information related to profenofos residues in agricultural products that exceeded MRLs, which could indicate a potential risk to consumers.

Bodar and Helbig agreed criterion b(iii) was met since MRLs are intended to protect consumers.

Barlow said information is missing to satisfy criterion b(iii), including which MRLs were exceeded and whether they were derived from toxicological data. Bart also expressed reservations, saying that MRLs are not established by a risk evaluation, and cited the lack of exposure data. Both recalled the CRC set aside a Malaysian notification for triazophos because the Committee did not think that MRLs were sufficient to satisfy b(iii). Sinhaseni, Sangster, Aluoch, Marasinghe, Vashishtha, Li, and observers from CHINA, ARGENTINA, BRAZIL, and KENYA agreed the criterion was not met, with many pointing to the lack of toxicological data and that the MRLs are not health-based safety standards.

CAMARA DE INDUSTRIA DE GUATEMALA said criterion b(iii) was not met because there was no comparison between exposure and hazard endpoints under the prevailing conditions of use in Malaysia. CROPLIFE LATIN AMERICA stressed that Malaysia did not conduct a risk evaluation and no information was provided on residue levels measured and if they represented an unacceptable risk.

PAN ASIA-PACIFIC drew attention to the potential for toxicity from MRL exceedances related to vegetable crops and cited the notification's conclusion that a strong case can be made for deregistration to protect the environment and health. PAN UK underlined that regular and consistent exceedances of MRLs over many years cannot be brushed aside, since an evaluation sets the thresholds to identify acceptable exposure rate.

Chair Gwayi asked members if further work on this chemical was needed. Ech-Chayeb, supported by Abbas, suggested requesting further information on the exceedances and their link to health risks. Bodar disagreed, saying that the information provided was sufficient.

Members agreed with Chair Gwayi's suggestion to task the Secretariat to prepare a draft rationale for the notification from Malaysia as the basis for discussion by the contact group on pesticide notifications.

An observer from ARGENTINA suggested the contact group discuss the notification first. Chair Gwayi assured that the draft rationale would not pre-empt the discussion.

On Thursday, the CRC agreed to defer its consideration of the notification from Malaysia and to seek additional information, namely, a copy of the residue monitoring study and supporting documents, which types of MRLs were used, how the observed incidents of MRL were evaluated to assess the risks posed to consumers, and associated health risks with their use in crops.

Prothiofos: On Thursday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.20/20](#)) and the supporting documentation from Malaysia ([INF/40](#)) and Türkiye ([INF/41](#)). She noted no intersessional work was undertaken and the Bureau considered that these notifications do not meet criterion b(iii). She said the Bureau noted the similarity between Malaysia's notification for this pesticide and profenofos.

On Türkiye's notification, CRC members agreed that no further action would be taken on this notification.

On Malaysia's notification, Barlow, Abbas, Ali, Ndiyo, Bart, Pinas, Vashishtha, Li, Amichand, Stefanovic, Sinhaseni, Paudel, Aluoch, Granato, Sørvik Malme, and Marasinghe supported the Bureau's findings that criterion b(iii) was not met.

Bodar suggested, supported by Sangster and Helbig, the CRC ask Malaysia the same questions for profenofos and phenthoate. Barlow, Ali, Ndiyo, Bart, Pinas, Amichand, Stefanovic, Sinhaseni, Paudel,

Aluoch, Granato, and PAN ASIA-PACIFIC supported further information to treat the Malaysian notifications similarly.

An observer from CHINA underlined that the MRL exceedances did not necessarily indicate a health risk and supported the Bureau's initial finding.

The CRC agreed to defer its consideration of this chemical and request the same additional information requested for profenofos, namely, a copy of the residue monitoring study and supporting documents, which types of MRLs were used, how the observed incidents of MRL were evaluated to assess the risks posed to consumers, and associated health risks with their use in crops.

Quinalphos: On Thursday, the Secretariat introduced two notifications ([UNEP/FAO/RC/CRC.20/21](#)) and supporting documentation from Malaysia ([INF/42](#)) and Türkiye ([INF/43](#)) noting the Bureau reviewed both and considered that criterion b(iii) was not met by either notification.

On Türkiye's notification, the CRC supported the Bureau's assessment and concluded no further action will be taken on this notification.

On Malaysia's notification, the Secretariat noted it is similar to the one on profenofos from Malaysia, for which an intersessional task group report will be prepared.

CRC members and PAN UK agreed the Secretariat should request additional information from Malaysia, similar to the request made during the review of the Malaysian FRA notification on profenofos.

An observer from NEW ZEALAND, supported by Barlow, underlined that Malaysia is using default MRL values, which he characterized as arbitrary, and said the exceedance of these values cannot be considered an indication of risk.

An observer from ARGENTINA stressed the MRL values used do not indicate risk and Malaysia acknowledged that no risk evaluation was conducted before regulatory action.

CRC members agreed to defer consideration to CRC-21 and request additional information on residue levels and their use in risk evaluation, in line with the request on profenofos.

Zineb: On Thursday, the Secretariat introduced two notifications ([UNEP/FAO/RC/CRC.20/23](#)) and supporting information from Ecuador ([INF/45](#)) and Türkiye ([INF/46](#)). He reported that the Bureau reviewed both notifications and viewed neither as meeting the listing criteria.

On both Türkiye's and Ecuador's notifications, CRC members agreed with the Bureau assessment that the notifications meet all criteria except b(iii) and no further action will be taken.

PAN UK suggested that it could be beneficial to request additional information, since the carcinogenic effect may have been the basis for the FRA.

Notifications from Mozambique: Since CRC-17, the Committee has considered notifications of FRA related to several pesticides from Mozambique. For each pesticide, views have diverged on whether these notifications meet criterion b(iii). These notifications were derived from the same FAO project focused on highly hazardous pesticides (HHPs) used for agriculture. The Secretariat reported that Mozambique, in an official response, stated that the completed national survey was related to several HHPs, with results showing that farmers were exposed to these due to a lack of personal protective equipment (PPE) use. After the survey, a stakeholder meeting was convened, where pesticides were discussed individually, and some were banned due to that consultation. For each of the pesticides below, the Committee ultimately agreed to request additional information.

Carbaryl: On Wednesday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.20/6](#)) and supporting documentation from Mozambique ([INF/10](#)).

Upon request from Amichand, the Secretariat clarified that Mozambique did not submit any additional documents related to this chemical only an official email response.

Sangster, Barlow, Bart, Sinhaseni, and Li stated that the notification does not meet criterion b(iii). Sangster and Barlow explained that, based on the survey's design, which did not examine specific chemicals, there is no clear link between exposure to carbaryl and the observed effects.

Helbig, Abbas, Bodar, Meliana, Dipāne, Ech-Chayeb, Birame, Escriva, Edmund, Ndiyo, Stefanovic, Pinas, Sørvik Malme, and Ali stated that criterion b(iii) was met. Helbig elaborated that the notification reflects the realities of pesticide use in Mozambique and the risk evaluation was enough to meet the Convention's requirements.

An observer from GUATEMALA and an observer from ARGENTINA proposed to set this agenda item aside following existing precedent when the CRC is unable to agree and no additional information is available. The observer from ARGENTINA noted surveys are not recognized methods for risk evaluations, and the survey identified knowledge gaps among farmers on the need to use PPE. She stated that the notification does meet criteria b(i), b(ii), b(iii), and d.

CROPLIFE INTERNATIONAL stated that criterion b(iii) is not met, and noting that Mozambique did not submit any new information in the official email, suggested that the CRC conclude that notification does not meet the Convention's requirements.

An observer from CHINA stated that this notification does not meet criterion b(iii) since a risk evaluation was not conducted, and the survey does not identify any exposure or risk assessment specifically for carbaryl.

PAN UK stated that the notification meets criterion b(iii) and indicates large quantities of carbaryl imported. Its main purpose is to ensure that no further import occurs. He reminded members of cases when notifications were accepted without evidence of ongoing trade.

On Friday, Chair Gwayi noted CRC-20 could not agree on whether the notification meets criterion b(iii). Members agreed to defer this item to CRC-21.

Chlorfenvinphos: On Wednesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.20/7](#)) and supporting documentation from Mozambique ([INF/11](#)).

Barlow and Bart noted the FRA should stem from registered use. Since chlorfenvinphos is only registered for veterinary purposes in Mozambique, and the survey only focused on agriculture applications, they said this notification does not meet criterion b(iii). Sangster agreed, adding that chlorfenvinphos is not listed as an HHP, and the survey conducted by Mozambique focuses solely on HHPs.

Sinhaseni requested clarification on whether chlorfenvinphos is used in agriculture in Mozambique. The Secretariat responded that specific questions for additional information were not posed for this chemical, but according to supporting documentation provided, it is registered as an insecticide for veterinary use. Sinhaseni stated that based on this explanation, the notification does not meet criterion b(iii).

Ali, Birame, Helbig, Abbas, Escriva, Ech-Chayeb, Edmund, Paudel, Dipāne, Ndiyo, Meliana, Granato, Stefanovic, and Bodar agreed the notification meets criterion b(iii). Helbig, with Escriva

and Ndiyo, stated that exposure from agricultural uses, especially given the lack of PPE, is likely similar to exposure from veterinary uses.

Bodar suggested the CRC decide whether to request additional information on this chemical.

PAN UK reiterated the process for the survey and subsequent stakeholder consultations that led to a ban on certain pesticides, including chlorfenvinphos. He suggested the CRC members who disagree that criterion b(iii) is met formulate specific questions.

An observer from KENYA stated that notification is based on a generic survey and does not reflect the concerns associated with specific chemicals, suggesting that listing on such grounds could potentially "distract from the CRC's focus."

On Friday, Chair Gwayi noted the CRC could not reach an agreement on whether Mozambique's notification meets criterion b(iii). She suggested deferring this agenda item to CRC-21.

Sangster and Bart objected to this proposal and noted since the survey did not cover veterinary use, no additional information is required because the notification clearly does not meet criterion b(iii). They proposed to put this notification aside.

Helbig stated the survey results could be interpreted as also applicable for veterinary use and proposed requesting additional information regarding a potential discussion about veterinary use at the stakeholder meeting where bans on specific chemicals were decided.

Ali, Abbas, Sinhaseni, Bodar, Amichand, Edmund, Meliana, Pinas, Paudel, Ndiyo, Dipāne, Ech-Chayeb, Aluoch, Stefanovich, Birame, Sørvik Malme, and Marasinghe agreed with the Chair's proposal to defer this agenda item. Many also supported Helbig's suggestion to request additional information, with Ndiyo and Ech-Chayeb stating they believe the notification already meets criterion b(iii).

Chair Gwayi proposed to defer the review of this notification and request additional information from Mozambique on veterinary uses and whether the stakeholder meeting discussed this use prior to regulatory action. CRC members agreed.

Ethion: On Wednesday, the Secretariat introduced the notification from Mozambique ([UNEP/FAO/RC/CRC.20/13](#)) and additional information ([INF/25](#)).

Sangster queried if CRC-19 requested information for the notifications related to other pesticides. Chair Gwayi said CRC-19 only asked Mozambique questions about ethion.

Sangster, Barlow, and Bart noted Mozambique's answers included information on environmental risks and welcomed further discussion on whether this was sufficient to meet criterion b(iii).

Bodar suggested the FRA was based on farmers' exposure, not environmental risk, according to the notification. Sinhaseni recalled the notification referenced risks to aquatic species and modelling done by the US Environmental Protection Agency related to ecological risks. With Acevedo González and Vashishtha, she said the notification did not meet criterion b(iii) based on health risks because no risk evaluation was conducted.

Ali, Marasinghe, Abbas, and Ndiyo said criterion b(iii) was met based on the country's prevailing conditions of use. Escriva agreed, noting the link between veterinary use, for which the chemical is registered in Mozambique, and farmers' exposure given the lack of PPE. Birame agreed, adding the risks presented by environmental contamination to human health.

Aluoch observed that no information is available related to occupational exposure from veterinary uses, which is the registered

use for the chemical. Since Mozambique stated no further information is available, she said the criterion was not met.

An observer from CANADA recalled the CRC treated the notifications from Mozambique as a package and said, despite the additional information for ethion, it is still not clear what the basis for the FRA was, including if it was based on an environmental risk evaluation.

PAN UK observed a lack of transparency regarding the specific questions, citing the CRC-19 report that mentions members' request for additional information for all notifications from Mozambique.

On Friday, Chair Gwayi noted the CRC could not agree on whether Mozambique's notification meets criterion b(iii). Members agreed to defer this agenda item to CRC-21.

Methodathion: On Wednesday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.20/15](#)) and supporting documentation from Mozambique ([INF/28](#)).

Barlow said criterion b(iii) was not met because little information exists to confirm the prevailing conditions of use in Mozambique and no information was provided about the introduction or use in Mozambique. Bart agreed, noting methodathion was not selected for the second part of the FAO project, which surveyed farmers on their use of HHPs.

Ali stated that it meets the criterion. An observer from KENYA said references to the FAO project were not specific to this pesticide, so the notification does not meet criterion b(iii).

An observer from ARGENTINA questioned if the notification meets criteria b(i), b(ii), b(iii), and d, highlighting that Mozambique confirmed it does not produce or use this chemical, so it is unclear how farmers could report exposure, and there was no risk evaluation conducted.

PAN UK said Mozambique consulted with experts and stakeholders as part of the FAO project and, based on those consultations, decided to regulate this active ingredient, which he said constituted a risk evaluation.

On Friday, Chair Gwayi noted members could not agree on whether Mozambique's notification meets criterion b(iii). She suggested deferring this agenda item to CRC-21.

Sangster and Bart objected, citing the insufficient risk evaluation since the chemical was not shortlisted for the survey on HHP use on crops and the lack of data on the import of methodathion before the FRA. Sinhaseni, Aluoch, and Barlow agreed that the notification clearly does not meet criterion b(iii) and suggested setting it aside.

Ali supported deferring the review of this notification, noting that methodathion is a registered pesticide and suggested requesting additional information on the reasoning for the FRA in the absence of import data. Helbig agreed, suggesting import data could have been recorded before the survey since methodathion is a registered pesticide.

Abbas, Bodar, Escriva, Dipāne, Ndiyo, Edmund, and Granato supported deferring the review to the next meeting. Bodar, Edmund, and Granato also supported requesting additional information. Escriva recalled the CRC previously agreed on a notification that did not have import data, and Ndiyo stressed he believes the notification already meets criterion b(iii). Edmund suggested CRC-21 should be the last time the five notifications from Mozambique are reviewed, at which time the CRC should approve or set them aside.

Members agreed to defer review of this notification and request information on this pesticide's imports before the survey and FRA.

Thiodicarb: On Wednesday, the Secretariat introduced the notification from Mozambique ([UNEP/FAO/RC/CRC.20/22](#)), the previously reviewed notification from the EU ([INF/27](#)).

Sangster, Li, and Bart said criterion b(iii) is not met because thiodicarb was not shortlisted for the survey in the FAO project, and therefore, there is a lack of information on prevailing conditions of use and risks. Acevedo González agreed the criterion was not met. Ali disagreed.

PAN UK noted that the survey did include cotton cropping systems for which thiodicarb is used and said this chemical was raised in consultation with stakeholders.

CROPLIFE INTERNATIONAL stated that the notification says the FRA was taken because thiodicarb was viewed as "coming close" to a World Health Organization (WHO) Class I chemical, but he said this chemical is listed as Class II. He also noted there is no evidence of import between 2010-2013, before the FRA was taken.

An observer from GUATEMALA said thiodicarb was not identified as an issue of concern in the initial stages of the FAO project until a meeting in 2013. With an observer from CHINA, he said a generic survey is insufficient to fulfill criterion b(iii).

An observer from ARGENTINA cited the lack of import into Mozambique and bridging information and said this chemical was not shortlisted for further work in the FAO project, which leads to a lack of information on why the FRA was taken.

An observer from BRAZIL queried the concept of "close to" an HHP mentioned in the notification and underlined that no risk evaluation was conducted. She called on the CRC to set this substance aside until new and relevant information is available.

On Friday, Chair Gwayi reported the CRC could not reach agreement on whether Mozambique's notification meets criterion b(iii). Members agreed to defer this agenda item to CRC-21.

Review of Proposals for the Inclusion of SHPFs: SHPFs are a mechanism for developing countries and countries with economies in transition to nominate pesticide formulations for listing in Annex III of the Convention. There are five criteria in Part 3 of Annex IV used to screen proposals:

- (a) There is reliable evidence that indicates that use of the formulation, following common or recognized practices within the proposing party, resulted in the reported incidents;
- (b) The incidents are relevant to other states with a similar climate, conditions, and patterns of use of the formulation;
- (c) The existence of handling or applicator restrictions involving technology or techniques that may not be reasonably or widely applied in states lacking the necessary infrastructure; and
- (d) The reported effects are significant concerning the quantity of the formulation used.

Cypermethrin emulsifiable concentrate 10%: On Wednesday, the Secretariat introduced the proposal from the Lao People's Democratic Republic (PDR) ([UNEP/FAO/RC/CRC.20/24](#)) and additional information from the Secretariat ([INF/47](#)).

Stefanovic and Sørvik Malme presented the task group's results, which concluded the proposal meets all the criteria of Part 3, Annex IV. She noted that the symptoms reported included headaches, itchiness, and skin rashes.

Sangster, Bart, Barlow, Vashishta, Sinhaseni, and Aluoch raised concerns about the proposal meeting criterion 3(d) and called for more discussion.

Sangster, Bart, Barlow, Sinhaseni, and Aluoch pointed out that Annex IV has no clear definition or threshold for the severity of the reported effects. Bart pointed to a similar case at CRC-13 when the Committee could not reach agreement due to a lack of information and ambiguity on the definition of severity. Bart and Vashishta raised

concerns about the composition of the SHPF under review since it is not registered in Lao PDR, and hence, the label may not match the product the farmers were exposed to.

Bodar warned against steering the discussion towards a definition of severity. Helbig noted that the purpose of listing SHPF is to facilitate information and called on interpreting “severity” in the spirit of the Convention instead of looking into thresholds. Stefanovic recalled that meeting certain severity thresholds is not required by the Convention and SHPF listing is reserved for developing countries where farmers apply pesticides in harsh conditions, where their lack of accessible PPE and nearby hospitals, and weather conditions are often detrimental.

Ali, Bodar, Abbas, Helbig, Pinas, Dipāne, Amichand, Marasinghe, Ech-Chayeb, Escriva, Ndiyo, and Stefanovic agreed that all criteria, including 3(d), were met. Ali highlighted that adverse health effects occurred after exposure to lower concentrations used than what is recommended by the label, which he said indicates the significance of the reported effects.

An observer from CANADA cited a lack of clarity on the severity of the effects and suggested more discussion.

An observer from BRAZIL raised concern on assessing unregistered or illegally traded products, calling for procedures to pre-screen proposals related to unregistered chemicals.

PAN ASIA-PACIFIC supported the task group’s results and, citing their experiences in Lao PDR, echoed Stefanovic’s explanation of the SHPF listing requirements in the Convention.

CROPLIFE INTERNATIONAL said not only criterion 3(d) but also 3(a) and 3(b) are not met due to a lack of information that the formulation caused health effects in the three incidents and there is no evidence of these incidents’ relevance for other countries.

CAMARA DE INDUSTRIA DE GUATEMALA called for the CRC to develop guidance for reviewing SHPF proposals.

The CRC established a contact group, chaired by Stefanovic, to further discuss whether the proposal meets criterion 3(d).

On Friday, Chair Gwayi reported that the Committee was unable to agree. She proposed to defer consideration to the next meeting.

She also proposed intersessional work on the review of the SHPF proposals. The Secretariat clarified the mandate for this group would be twofold: to update the current compilation of experiences ([CRC.14/INF/15](#)), including to identify possible gaps in the information needed to assist the Committee’s decision-making, and to review the human health incident form and environmental health incident form and propose changes as necessary to support and improve information collection for decision making. Chair Gwayi stressed the capacity limitations many developing countries face in collecting the relevant information to propose SHPFs and that the forms cannot be overly prescriptive.

Amichand and Ali relayed the challenges faced in their countries, including a lack of poison control centers and post-registration surveillance of use and incidents. Sinhaseni suggested considering the FAO incident form for environmental incident reporting to harmonize reporting at the community level. Abbas called for continued Secretariat capacity building for designated national authorities.

PAN UK suggested considering chronic health effects in the health incident form. He also called for clarity on whether all criteria in Annex IV, Part 3 must be met, noting the Convention says that members should “take into account” the listed criteria.

CAMARA DE INDUSTRIA DE GUATEMALA objected to including chronic health effects, noting the Convention only specifies acute effects. He stressed the need to consider the severity

of the observed effects and collect information to establish a causal link between exposure and the effects.

The CRC agreed to defer its consideration and to establish the intersessional group, to be chaired by Stefanovic with Sørvik Malme serving as drafter.

Cypermethrin emulsifiable concentrate 35%: On Wednesday, the Secretariat introduced the proposal from the Lao PDR ([UNEP/FAO/RC/CRC.20/25](#)) and information collected by the Secretariat ([INF/48](#)).

Task Group Chair Stefanovic and Drafter Sørvik Malme presented the group’s conclusions based on three reported incidents caused by this formulation, leading to itchiness, headaches, excessive sweating, and skin rashes. They highlighted that the group could not conclude whether criterion 3(d) was met because, while the farmers used the formulation according to normal and common use patterns, it was used for a long period (half a day) and at a dosage higher than recommended by the label. Several members called for further discussion.

Barlow and Sinhaseni queried if the reported effects were significant or severe. Bart noted that the same symptoms are reported for the 10% concentrate proposal, saying there doesn’t seem to be a correlation between the concentration and the significance of the effects observed. Sangster reiterated his call for guidance on how to evaluate severity.

Bodar, Ali, Marasinghe, and Vashishtha said off-label use at a higher concentration complicates the decision regarding criterion 3(d).

Helbig observed two relevant “realities,” which are that farmers use available pesticides, regardless of whether they are registered for use, and that farmers use concentrations they are accustomed to, regardless of label instructions.

PAN UK applauded further discussion in the wake of uncertainties, noting that criterion 3(d) states that effects should be “significant” not “severe” and that no criteria specifies a formulation must be registered in the country of use.

An observer from GUATEMALA, supported by CAMARA DE INDUSTRIA DE GUATEMALA and CROPLIFE INTERNATIONAL, cited “fundamental issues,” including that the reported effects were minor and there is no verification that the use led to the effects. They stressed the proposal is based on one low-severity incident and is irrelevant to other states.

An observer from KENYA stressed the need to decide whether off-label use meets the criteria for conditions of use.

The contact group for SHPFs was tasked with considering whether this proposal met criterion 3(d).

On Friday, Chair Gwayi noted that the contact group on SHPFs could not agree on whether the proposal meets criterion 3(d). Recalling the earlier decision to form a task group on SHPFs, she suggested, and members agreed, that this agenda item be deferred to CRC-21.

Emamectin benzoate water soluble granules 5%: On Wednesday, the Secretariat introduced the proposal ([UNEP/FAO/RC/CRC.20/26](#)) and additional information collected by the Secretariat ([INF/49](#)).

Task Group Chair Stefanovic and Drafter Sørvik Malme introduced the conclusions of the task group, noting that the proposal is based on a single incident of adverse effects caused by the use of a formulation not registered for use in the Lao PDR. They reported that the group could not conclude whether criteria 3(a) and 3(d) were met. For 3(a), they said the assessment was complicated because the surveyed farmers had difficulty recalling the pesticide

formulations they used, particularly given their use of multiple products, however, one farmer had recalled specifically using SAN EMA 5 (trade name for this SHPF) before experiencing health concerns. Related to criterion 3(d), they relayed that the symptoms were itchiness and skin rashes and that the farmer used a higher concentration than outlined on the label.

Sangster, Ali, Ech-Chayeb, Escriva, Birame, Meliana, and Bart considered 3(a) to be met since the farmer connected the formulation's use to the adverse effects experienced. Barlow and Bodar said the case for 3(a) is "weaker" given the higher concentration used. Sørvik Malme noted that no similar incidents were identified elsewhere, and with several others suggested further discussion on this criterion.

Barlow, Bart, Ali, Bodar, Birame, and Sangster said that criterion 3(d) was not met. Several members suggested further discussion on this criterion.

An observer from CHINA stated that off-label use should lead the CRC to conclude that criterion 3(d) is not met.

An observer from BRAZIL expressed concern about illegally traded products, noting it is difficult to identify the active ingredients in unregistered products. She called for the CRC to request a COP decision to clarify the concept of severe effects and provide guidance on illegally traded or unregistered products. With an observer from ARGENTINA, she said the criteria have not been met.

The CRC agreed to extend the mandate of the contact group on SHPF proposals to consider this proposal, focusing on criteria 3(a) and 3(d).

On Friday, Chair Gwayi noted the contact group could not agree whether the proposal meets criterion 3(d), although members agreed that it meets criterion 3(a). Recalling the earlier decision to form a task group on SHPFs, she suggested, and the members agreed to defer this agenda item to CRC-21.

Methomyl soluble powder 40%: On Wednesday, the Secretariat introduced the proposal by Lao PDR ([UNEP/FAO/RC/CRC.20/27](#)) and additional information ([INF/50](#)). Task Group Chair Stefanovic and Drafter Sørvik Malme presented the group's report, stating the proposal meets the criteria set out in 3(b), (c), and (e), but does not meet the criteria set out in 3(a) and (d), concluding that the proposal does not meet all the criteria of Annex IV Part 3.

Many CRC members agreed with the conclusion of the task group.

The observer from CANADA echoed the members' views, suggesting the Bureau should screen cases like this proposal that clearly do not meet the criteria, similarly to how it is now done with notifications.

PAN agreed with the task group assessment that the proposal does not meet Annex IV Part 3 criteria.

The CRC agreed that no further action will be taken.

Venue and Dates of CRC 21

CRC-21 will take place from 22-26 September 2025 at FAO headquarters in Rome. Members noted the information with the understanding that the arrangements might be adjusted based on the number of notifications and availability of resources.

Other Matters

Updated Indicative List for PFOA, its salts and related compounds: On Friday, the Secretariat verbally outlined the updated indicative list and the CRC took note of this information.

Effective Participation: On Friday, the Secretariat reported on activities to support CRC members and observers, including online training and webinars. He stated that an orientation workshop will be held in February 2025.

Several members thanked the Secretariat for its efforts. Abbas, Aluoch, and Ech-Chayeb appreciated the orientation workshop, which helped new members navigate the Committee and Rotterdam Convention procedures.

Intersessional work on FRAs: On Friday, the Secretariat reported many new notifications and the expectation that more will be received before the next PIC Circular. He said the Secretariat would consult with the Bureau to plan the intersessional work. The CRC took note of the information provided.

Closure of the Meeting

The CRC adopted its report (UNEP/FAO/RC/CRC.20/L.1) with minor editorial amendments.

Deputy Executive Secretary David Ogden expressed appreciation for the work of the Committee members and observers, underlining the CRC's role as the body entrusted by the Convention to make recommendations.

Rotterdam Convention Co-Executive Secretary *ad interim* Christine Fuell congratulated members for realizing outcomes across the full agenda. She underlined that even the notifications that did not meet the criteria contribute to information exchange.

Chair Gwayi underscored her appreciation for members' commitment to furthering the spirit of the Convention by assisting developing countries to manage chemicals safely.

She gavelled the meeting to a close at 12:39 pm.

A Brief Analysis of CRC-20

Information is a resource that can empower decision-making and safeguard human health and the environment. The Rotterdam Convention's Chemical Review Committee (CRC) experts seek to provide this resource. Their work is vital to the smooth functioning of the Convention's prior informed consent (PIC) procedure, which shares information about chemicals and enables countries to accept their import and, if imported, to manage the chemical safely. The CRC recommends which chemicals should be included in the PIC procedure and compiles the information to inform international trade.

But the decisions are ultimately up to the Conference of the Parties (COP), which is in the midst of a crisis of confidence. The last COP was marred by divisive discussions about the Convention's effectiveness and a vote on whether to amend the Convention narrowly failed. Those pushing for change pointed to a list of chemicals that the CRC recommended, but the COP could not agree to include in the PIC procedure. The list grows at each COP and now stands at six chemicals, mostly pesticides. There have been intersessional brainstorming sessions and submissions, information gathering and other reflexive exercises to try to get to the heart of why the Rotterdam COP struggles to accept the CRC's recommendations.

Each time, the COP accepts the CRC's technical work but does not list the chemical. Yet, countries sometimes question the Committee's work while debating its recommendations. As one CRC member put it, "If only the COP would just tell us if what we're doing is the problem and what to change, or if the problem is purely political." Several noted that Brazil, Argentina, Guatemala, China and other countries that had opposed amending the Convention and

at times question CRC recommendations sent observers to CRC-20. In struggling to find its footing, some worried the COP's crisis of confidence might spread to its scientific body.

Working under this magnifying glass, this brief analysis considers how the Committee undertook a heavy workload and tried to live up to the letter and spirit of the Convention.

Proving its Value

CRC-20 faced a hefty workload. The Committee has not had so many notifications to review since its early years. The 33 notifications on the agenda were a shortlist from the Bureau's review of what one member called a "landslide" of notifications. Many attributed this landslide to the Convention's new compliance mechanism: it is a requirement to notify the Secretariat when a country enacts a final regulatory action (FRA) to ban or severely restrict a chemical. This newfound interest in complying with the Convention led to a full agenda for CRC-20.

The Bureau prioritized those notifications that were most likely to meet the criteria for listing. Still, only four notifications were approved. The few approved notifications and expectations for future notification landslides prompted questions about ways to ensure the Committee's effectiveness, given that its members work on a volunteer basis.

Some participants queried the added value of the CRC's review and potential future listings in the Rotterdam Convention for chemicals governed by other bodies. The Rotterdam Convention is just one treaty working amid a fragmented landscape of international and regional treaties and voluntary initiatives. Each has its own mandate and scope. The Rotterdam Convention focuses on informed international trade of various chemicals. Three chemicals on CRC-20's agenda are already listed in the Stockholm Convention on Persistent Organic Pollutants (POPs), which eliminates or restricts the use of POPs and has its own trade provisions. When countries fulfill their obligations under the Stockholm Convention and regulate POPs, they often pass domestic legislation banning the chemical. That regulation would be an FRA, prompting a notification under the Rotterdam Convention. Some observers wondered if the Committee could set aside notifications for chemicals eliminated under the Stockholm Convention. They struggled to see the added value of collating and providing information on a chemical no longer produced or used and, therefore, not traded.

Other participants looked within the Rotterdam Convention itself to ask about the added value of some of the notifications the Committee reviewed. They took an instrumentalist view: the purpose of the Committee is to recommend chemicals for listing. Notifications that do not help with that goal, they suggested, could be "redundant." For example, members spent a fair amount of time in plenary and a contact group reviewing paraquat notifications from several West African countries. Ultimately, the notifications met the listing criteria, but no further action is needed. There is already a recommendation to the COP to list paraquat based on notifications that the CRC previously deemed to have met the criteria. The West African notifications were, in the eyes of some, inconsequential to the goal of recommending listing chemicals for the PIC procedure.

Similarly, some thought the Bureau could consider the unique "arithmetic of the Convention." The CRC must approve two notifications from different PIC regions to recommend listing a chemical. It is a high bar set to avoid a situation where one country's whims could trigger global action. Instrumentally speaking, some observers noted that two notifications from the same PIC region

do not get the Committee any closer to a recommendation. For example, the Swiss notification that it banned dicofol was prioritized for review, but there is already an approved EU notification. Members could review the Swiss regulatory action, but would get the CRC no closer to a listing recommendation.

Yet some members vehemently support reviewing as many notifications as possible. Taken together, the notifications provide an overall picture of countries' actions to regulate chemicals. This in itself, they stressed, is valuable. One member noted it was new for the Bureau to prioritize. For so long, he remembered, the Committee was desperate to get countries to send their notifications. He suggested that it is too soon to start "radically pruning" the notifications received.

Upholding the Letter and the Spirit of the Convention

Opening the Diplomatic Conference that adopted the Rotterdam Convention in 1998, then FAO Director-General Jacques Diouf drew global attention to the lack of infrastructure, trained personnel, and other constraints compounding the dangers of pesticide use in many countries. Twenty-six years later, CRC Chair Noluzuko Gwayi called this the "spirit of the Convention" to support developing countries with the information they need to make import and management decisions that will protect their citizens.

In keeping with that spirit, Chair Gwayi and several members encouraged a "facilitative" approach to reviewing developing countries' proposals that recognizes their challenges in gathering technical information. But with the Convention facing questions about its effectiveness, some members and observers sought greater scrutiny and a stricter interpretation of its letter.

The Rotterdam Convention requires the Committee to review notifications of FRA against the Annex II criteria, and proposals for severely hazardous pesticide formulations (SHPFs) against the Annex IV criteria. Many debates at CRC revolved around adherence to criterion b(iii) for FRA notifications and 3(d) for SHPF submissions. Both relate to the potential or observed adverse effects of the proposed chemical use in the country: b(iii) states that the FRA was based on a risk evaluation and 3(d) states that the reported effects were significant. In short, substances listed in the Convention should pose a risk to health or the environment, prompting a need for informed international trade.

The letter vs spirit debate was acutely evident when reviewing Malaysia's and Mozambique's notifications of nine pesticides in total. Malaysia said it did not perform a risk evaluation, but some members were less sure. They noted that Malaysia acted to protect consumers because several crops had residues of these pesticides that exceeded the maximum residue limits (MRLs). Members working in the Convention's spirit pointed to the MRL study and its use as a risk-management measure as enough to constitute a risk evaluation. Other members and observers stressed that MRLs are not set with health or environmental risk in mind, and could not be considered a risk evaluation.

The "is it a risk evaluation" debate continued for the Mozambican notifications, as it has since CRC-17. Originally Mozambique submitted seven notifications based on an extensive capacity-building project by the FAO, only two of which (terbufos and iprodione) passed the review at the initial submission. Members debated if expert and stakeholder consultations and a generic survey of farmers' agricultural use of highly hazardous pesticides (HHPs) were sufficient for a risk evaluation.

A survey and consultations fell short of generating or reviewing data using recognized scientific methods for some members and observers. They also questioned how to extrapolate the project's findings: can they apply to chemicals that were not shortlisted for the survey (like methidathion), or for chemicals (like chlorfenviphos) that, despite being pesticides, are registered in Mozambique only for veterinary application?

Many other members were more comfortable with the risk evaluation criterion being met because the Convention also stresses that this evaluation must involve the "prevailing conditions of use" in the country. To them, this meant some demands for data are unrealistic for developing countries, where the capacity to track all pesticides traded and used within the country is very limited. They also pointed out that farmers often use available pesticides without protective gear or necessarily knowing how their government in a faraway capital registered their use. The pesticides are there, needed and, therefore, used.

Members deferred a decision on the Malaysian and Mozambican notifications and relayed specific, targeted questions to officials in both countries. One observer remained skeptical about whether CRC-21 would solve these issues, notably since Mozambique previously suggested that no further information would be available since the FAO project ended.

The CRC also had to defer consideration of three of the four SHPF proposals on the agenda. For these three, debates centered on if the health effects reported were indeed "severe" or, in the Convention's undefined terms, "significant." Farmers in the Lao People's Democratic Republic (PDR) reported headaches, itchiness, and rashes after using specific pesticide formulations. For some, these symptoms were mild and reported cases were few. Should these effects, one observer wondered, reported by a handful of farmers, trigger global import responses from over 160 states?

Several members again pointed to limited capacities in the countries where, in the absence of poison control centers and accessible hospitals in rural areas, even if severe health effects do occur, they are often not recorded. In rural areas, the gap between experiences on the ground and national-level surveillance and record-keeping can be vast. One case, these members reasoned, could represent many more.

Given the debate about definitions, CRC asked for further information from Lao PDR. Committee members also took on additional intersessional work on SHPFs, including looking at the health and environmental incident forms that countries are asked to complete. Chair Gwayi stressed this review should not raise the reporting burden for developing countries.

Supporting the COP

The Rotterdam Convention COP is rumored to be scheduled first, before its Stockholm and Basel counterparts at the upcoming "TripleCOP" in May 2025. Traditionally, the Rotterdam COP was held last, which may have created an impression that it was the least important. Even such symbolic timing matters for a treaty trying to argue for its relevance. Convening first may give the Rotterdam COP additional time to work through its crisis of confidence. Part of this collective exercise may involve considering its relationship to its subsidiary body.

CRC-20 showed that the subsidiary body is well placed to support the COP. Many remarked on the high levels of detailed engagement and rigorous debates among members. A once quiet Committee has come to life. Members worked to scrutinize not just the notifications and proposals before it but also the real-world

challenges of pesticide use that many farmers face. Closing CRC-20, Deputy Executive Secretary David Ogden was adamant that members should continue with the confidence that they constitute the body entrusted by the COP to set out recommendations that could inform trade decisions around the world.

Upcoming Meetings

POPRC-20: The Stockholm Convention's Persistent Organic Pollutants Review Committee (POPRC) will consider proposals to list polyhalogenated dibenzo-p-dioxins and dibenzofurans (PXDD/PXDF) in Annex C to the Convention, as well as review the draft risk management evaluation for chlorpyrifos. Among other issues, it will review information related to stockpiles, products and articles in use and wastes. **dates:** 23-27 September 2024 **location:** Rome, Italy **www:** pops.int

Montreal Protocol MOP 36: The combined 36th Meeting of the Parties and thirteenth meeting of the Conference of the Parties to the Vienna Convention will discuss issues related to implementation of the Convention and the Montreal Protocol on Substances that Deplete the Ozone Layer. **dates:** 28 October – 1 November 2024 **location:** Bangkok, Thailand **www:** ozone.unep.org

Annual General Meeting (AGM) of the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF): The 20th AGM of the IGF will meet with the theme: Redefining Mining: Balancing the Need for Minerals with Protecting People and the Planet. **dates:** 18-20 November 2024 **location:** Geneva, Switzerland **www:** igfmining.org/annual-general-meeting

Plastic Pollution Intergovernmental Negotiating Committee (INC) 5: The INC to develop an international legally binding instrument on plastic pollution, including in the marine environment, will continue negotiations with a view to reaching agreement on the treaty. **dates:** 25 November - 1 December 2024 **location:** Busan, Republic of Korea **www:** unep.org/inc-plastic-pollution/session-5

Basel Convention COP 17, Rotterdam Convention COP 12, and Stockholm Convention COP 12: The Basel, Rotterdam, and Stockholm COPs will meet to address proposed listings to the respective conventions' annexes, and issues of joint concern such as financial and technical assistance. **dates:** 28 April – 9 May 2025 **location:** Geneva, Switzerland **www:** brsmeas.org/2025COPs/

For additional upcoming events, see sdg.iisd.org/

Glossary

CILSS	Comité Permanent Inter-États de Lutte contre la Sécheresse dans le Sahel
COP	Conference of the Parties
CRC	Chemical Review Committee
DGD	Decision Guidance Document
FAO	Food and Agriculture Organization of the UN
FRA	Final regulatory action
HHP	Highly hazardous pesticide
MRL	Maximum residue limit
SHPF	Severely hazardous pesticide formulation
PAN	Pesticide Action Network
PDR	Lao People's Democratic Republic
PIC	Prior informed consent
PPE	Personal protective equipment