

Summary of the 21st 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: 23-26 September 2025

Pesticides are often viewed as integral to agriculture, particularly in light of global concerns about food security. In 2022, total pesticide use in agriculture was 3.7 million tonnes of active ingredients, marking a 13% increase in a decade, and a doubling since 1990. Increased use has led to concerns about the negative health and environmental effects of pesticides. There are worries about their persistence in soil and water, impacts on non-target species, including pollinators and wildlife, and health risks to farmers and consumers.

Global efforts to promote safe use and reduce exposure to hazardous pesticides are evolving. The Rotterdam Convention is now part of this broader governance landscape, which includes the Global Framework on Chemicals, which aims to eliminate the use of highly hazardous pesticides by 2035. Listing a pesticide in the Rotterdam Convention can classify it as a highly hazardous pesticide.

With an agenda entirely made up of pesticides, there was particular salience to the work of the 21st meeting of the Chemical Review Committee (CRC-21). The CRC reviewed 35 notifications of final regulatory action related to 18 pesticides and three proposals for severely hazardous pesticide formulations (SHPFs). They found that many of the notifications and all of the SHPF proposals do not meet the criteria set out in the Convention. In particular, many of the national bans or restrictions were not taken after a risk evaluation based on the prevailing conditions of use in the country (criterion b(iii) in Annex II). Countries used other methods in line with their national legal frameworks and the information available to them.

The CRC deferred its consideration of five notifications because it could not agree whether the threshold for a risk evaluation was met. These include one notification from Mozambique on carbaryl and four from Malaysia.

CRC-21 was attended by 26 members, 43 participants from 23 government observers, and 18 participants from nine observer organizations.

The members of the CRC are: Adam Barlow (Australia), Jordane Wodli (Austria), Stephen Sangster (Belize), Saïdy Motladiile (Botswana), Christian Bart (Canada), Cangmin Li (China), Tatiana María Vásquez Morera (Costa Rica), Carles Escrivà (Germany),

Joseph Edmund (Ghana), Suresh Amichand (Guyana), Amit Vashishtha (India), Yenny Meliana (Indonesia), Shabnam Heidari Faroughi (Iran), Giuseppe Granato (Italy), June Aluoch (Kenya), Elīna Lazdekalne (Latvia), Sidi Ould Aloueimine (Mauritania), Saida Ech-Chayeb (Morocco), Shankar Prasad Paudel (Nepal), Catherine Smit (the Netherlands), Irene Sørvik Malme (Norway), Zaigham Abbas (Pakistan), Christian Sekomo Birame (Rwanda), Suzana Andrejevic Stefanovic (Serbia), Noluzuko Gwayi (South Africa), Jeevani Prasadika Marasinghe (Sri Lanka), Victorine Pinas (Suriname), Palarp Sinhaseni (Thailand), Hasmath Ali (Trinidad and Tobago), and Daniel Ndiyo (Tanzania).

A Brief History of the CRC

The continued growth in chemical production and trade has prompted 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 some developing countries.

Developing countries are particularly vulnerable to these effects, as they often lack the infrastructure to monitor the import and use of chemicals. 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

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September 1998. It entered into force on 24 February 2004 and currently has 167 Parties.

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 severely hazardous pesticide formulations (SHPFs).

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 domestically 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.

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

Recent Highlights

CRC-14: In 2018, the CRC adopted the draft Decision Guidance Documents (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 final regulatory action (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 and an in-online format 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 draft 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 its 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: At its September 2024 meeting, the CRC adopted draft DGDs for chlorpyrifos and mercury and agreed that notifications on chlorpyrifos-methyl and paraquat meet the criteria to be listed in the Rotterdam Convention.

COP-12: At its 2025 meeting, the COP agreed to list carbosulfan, a pesticide, and fenthion ultra-low volume formulations, a SHPF. The COP could not agree to list several other chemicals, including mercury, methyl bromide, and chlorpyrifos. The decision to improve the Convention's effectiveness largely focused on activities that will facilitate the effective participation of all CRC members, such as interpretation and translation services.

CRC-21 Report

On Tuesday, 23 September 2025, CRC Chair Noluzuko Gwayi (South Africa) opened the meeting and expressed gratitude to CRC members, the Bureau, Co-Chairs and Drafters, Secretariat, observers, and everyone who contributed to the intersessional work. She reminded everyone that the Rotterdam Convention requires risk evaluation, not risk assessment, and highlighted that the CRC is tasked with producing high-quality recommendations to the COP.

Co-Executive Secretary *ad interim* Christine Fuell (Food and Agriculture Organization of the UN (FAO)) welcomed the new CRC members and acknowledged the work of the Secretariat in providing training for them. She noted a heavy agenda for CRC-21, with 18 pesticides and three SHPFs under review, and highlighted the role of regulating pesticides for food security and food systems. Fuell then highlighted the FAO's efforts and activities in chemicals management and called for adhering to the principles of information exchange, scientific evidence, transparency, and scientific responsibility.

Co-Executive Secretary Rolph Payet highlighted implications of chemicals and waste management for global health, environmental safety, food security, and socioeconomic stability. He suggested that the heavy agenda is evidence of growing concern over hazardous chemicals and pesticides. He highlighted technical support provided by the Secretariat to develop information systems, submit import responses, and develop national action plans. Payet thanked outgoing CRC Chair Gwayi for her eight years of service, praising her work at the CRC and efforts in championing the Rotterdam Convention.

Organizational Matters

On Tuesday, the CRC adopted the agenda ([UNEP/FAO/RC/CRC.21/1](#) and [Add.1](#)) and organization of work ([INF/1](#) and [INF/2](#)).

The Secretariat introduced the rotation of membership ([UNEP/FAO/RC/CRC.21/INF/4/Rev.1](#)), noting that the COP requested the Committee to identify an interim Chair. They also reported that beginning 30 April 2026, there will be no members from the Central and Eastern Europe region because the COP was unable to elect any members from that region. The CRC took note of the information.

On Friday, Chair Gwayi informed that Ndiyo and Sangster were chosen as new CRC Bureau members. She also said that the Bureau nominated Sangster as a new interim CRC Chair, effective 1 May 2026.

Review of the outcomes of the twelfth meeting of the Conference of the Parties (COP12) to the Rotterdam Convention that are relevant to the work of the CRC: On Tuesday, the CRC took note of the outcomes of Rotterdam Convention COP-12 presented by the Secretariat ([UNEP/FAO/RC/CRC.21/INF/3](#)). The Secretariat informed that fundraising efforts have begun for the translation of the handbook and interpretation at CRC meetings but reported that no funds have been received to date.

Technical Work

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.21/2](#)), information on trade ([UNEP/FAO/RC/CRC.21/INF/5/Rev.2](#)), and summary of notifications of final regulatory action reviewed, or scheduled for review, by the CRC ([UNEP/FAO/RC/CRC.21/INF/6](#)).

Vice Chair Pinas presented the preliminary review of notifications contained in the Bureau's report. She reported that carbaryl, diazinon, dicofol, and fipronil were not prioritized because a preliminary review indicated the notifications would not meet the criteria. For the remaining chemicals, she reported that three intersessional task groups reviewed the notifications in advance of this meeting. The CRC took note of the information.

Review of Notifications of Final Regulatory Action: Annex II of the Convention sets out the criteria that countries' notifications of final regulatory action must meet to be listed in Annex III of the Convention. The CRC reviews notifications against these criteria, to determine if the final regulatory action:

- was taken to protect human health or the environment (criterion a);
- was the consequence of a risk evaluation, and documentation demonstrates that the data was generated according to scientifically recognized methods (criterion b(i)); the data reviews were performed and documented according to generally recognized scientific principles and procedures (criterion b(ii)), a risk evaluation based on the prevailing conditions of use in the country (criterion b(iii)); and the risk evaluation involved prevailing conditions of use within the Party taking the action (criterion b(iv)); and
- provides a sufficiently broad basis to merit listing in Annex III, by considering whether it is expected to lead to a reduction in the quantity of the chemical used or the number of its uses (criterion c(i)), a reduction in risk or expected reduction in risk (criterion c(ii)), if the consideration leading to the regulatory act applies to a limited geographic region or in limited circumstances (criterion c(iii)), and if there is evidence of ongoing trade.

The Committee must also take into account that intentional misuse of a chemical is not sufficient to warrant its listing in the Convention (criterion d).

Carbaryl: On Thursday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/3](#)) and supporting information from Serbia ([INF/8](#)).

On the Serbian notification, members agreed with the Bureau that the notification does not meet criterion b(iii). PESTICIDE ACTION NETWORK (PAN) UK concurred. The notification was set aside.

Chlorothalonil: On Tuesday, the Secretariat presented the notifications ([UNEP/FAO/RC/CRC.21/5](#)) and supporting documents from Costa Rica ([INF/10](#)) and the EU ([INF/11](#)).

Chair Ech-Chayeb and Bart presented on the deliberations of the intersessional task group, which concluded that the EU notification meets all the Annex II criteria, and the notification from Costa Rica meets all the criteria, except criteria b(ii) and b(iii) on which the group could not find agreement.

On the notification from the EU, Escriva, Barlow, Sangster, Pinas, Ali, Wodli, Sørvik Malme, Sekomo Birame, Amichand, Andrejevic Stefanovic, Motladiile, Granato, Meliana, Ndiyo, Vásquez Morera, Smit, and Edmund agreed that the criteria in Annex II are met.

An observer from BRAZIL welcomed the EU's notification, stating that in Brazil, data also confirm the toxicity of chlorothalonil, which is scheduled for a re-evaluation of its carcinogenicity in 2026, despite being registered and widely used. An observer from the US also agreed that the EU notification meets Annex II criteria.

PAN UK pointed out that since the EU notification meets criterion c(iii) (relevance to other regions), the data could be applied to Costa Rica's notification as bridging information.

CROPLIFE INTERNATIONAL and CAMARA DE INDUSTRIA DE GUATEMALA agreed that criterion b(iii) is met but stressed that some aspects of the data do not qualify as risk evaluation, particularly on groundwater levels, stressing that only results on risk to amphibians and fish should qualify as risk evaluation.

An observer from CHINA noted that the ban of chlorothalonil was a precautionary measure and was not based on risk evaluation based on the analytical data used.

On Costa Rica's notification, Barlow, Vashishta, Sangster, Bart, Aluoch, and others suggested a contact group to further discuss this complex notification. Barlow noted that data for exposure in water is for metabolites, not the chemical itself, stating that criterion b(ii) is not met. Aluoch noted that some documents need translation and that the notification was based on the precautionary principle.

Sinhaseni, Escriva, Ndiyo, and Motladiile noted that the notification by Costa Rica, which lacks capacity to monitor and control metabolites in soil and water, illustrates the difficulties developing countries have with technical analysis. Sinhaseni suggested the CRC consider what a lack of capacity means for bringing forward the information. Ali stressed that metabolites were identified in groundwater, and the impact they can have on health and the environment is concerning. Ndiyo noted that the provided information is sufficient for risk evaluation.

An observer from the US stressed that Costa Rica's notification does not meet the criteria b(iii), as the regulatory action was not based on risk evaluation. They noted that exceedance of metabolites in drinking water was not based on a hazard threshold for this specific chemical, but rather on a general identification threshold, and recalled several CRC sessions where groundwater exceedance was not recognized as a risk evaluation.

CROPLIFE INTERNATIONAL and CAMARA DE INDUSTRIA DE GUATEMALA noted that criterion b(iii) was not met since Costa Rica's notification was based on an identification threshold for metabolites in the water, not on a hazard threshold, and therefore does not indicate effects of their presence. They stressed that under Costa Rica's new threshold adopted for chlorothalonil, the reported levels are considered safe. They also raised concerns over methodology and data, suggesting that criterion b(i) was not met.

PAN UK highlighted how capacity needs affect countries' ability to address criterion b(iii) and reiterated that EU regulatory action can be relevant for other jurisdictions, as mentioned in the EU's supporting documents.

Observers from ARGENTINA and INDIA stated that criterion b(iii) was not met, and an observer from BRAZIL noted concerns over methodological limitations.

Chair Gwayi noted general agreement on the EU notification and the need for further discussion on Costa Rica's. A contact group was established, co-chaired by Ech-Chayeb and Bart, to draft the rationale on the EU notification and further deliberate whether the notification from Costa Rica meets all Annex II criteria.

On Thursday, CRC members adopted the draft rationale for the EU notification (CRP.15) and draft decision (CRP.16). The Committee agreed that the notification from Costa Rica did not meet criterion b(iii) and set aside the notification.

Final Decision: In its final decision (CRP.16), the CRC concludes that the EU notification of final regulatory action for chlorothalonil meets the Annex II criteria and adopts the rationale for the Committee's conclusion. The CRC notes that, as only a notification of final regulatory action from one PIC region in respect

of chlorothalonil meets the Annex II criteria, it will take no further action on the chemical at present.

Diazinon: The Secretariat presented the notifications ([UNEP/FAO/RC/CRC.21/6](#)) and supporting documentation from Bosnia and Herzegovina ([INF/12](#)), the EU ([INF/13](#)), Serbia ([INF/15](#)), and Türkiye ([INF/16](#)). While notification from the EU underwent intersessional work, the other three were reviewed by the Bureau, which agreed that the criteria of Annex II were met, except for b(iii).

Sangster reported on the deliberations of the intersessional task group that concluded that the EU notification met all Annex II criteria.

Smit, Barlow, Wodli, Meliana, Escriva, Aluoch, Sørvik Malme, Ech-Chayeb, Bart, Vashishta, Andrejevic Stefanovic, and Ali agreed with the task group's conclusions that the notification from the EU meets all the criteria of Annex II.

On the notification from Bosnia and Herzegovina, Sangster, Bart, Wodli, Vashishta, Aluoch, Ndiyo, Escriva, Smit, Ali, Edmund, and Meliana agreed with the assessment of the Bureau that criterion b(iii) is not met. Wodli explained that this regulation is in line with EU requirements and, therefore, is naturally not based on a risk evaluation.

CAMARA DE INDUSTRIA DE GUATEMALA agreed with the Bureau, reiterating that this notification is due to the effort of harmonizing national and EU regulations, hence no data to support criterion b(iii) was provided.

On the notification from Serbia, Escriva, Wodli, Bart, Sangster, Vashishta, Edmund, Meliana, Sørvik Malme, Ali, Motladiile, Ech-Chayeb, Smit, and Granato agreed with the Bureau's assessment that criterion b(iii) is not met.

On the notification from Türkiye, Escriva, Sangster, Edmund, Ndiyo, Vashishta, Wodli, Barlow, Meliana, Smit, Amichand, Aluoch, Granato, and Sørvik Malme agreed with the Bureau's assessment that criterion b(iii) is not met.

Chair Gwayi noted that there is general agreement that only the EU notification, representing a single geographic region, meets the Annex II criteria. She suggested that the contact group on methiocarb also consider the rationale on diazinon based on the EU notification.

On Thursday, CRC members adopted the draft rationale (CRP.17) and draft decision (CRP.12) for the EU notification.

Final Decision: In its final decision (CRP.12), the CRC concludes that the EU notification of final regulatory action for diazinon meets the Annex II criteria and adopts the rationale for the Committee's conclusion. The CRC notes that, as only a notification of final regulatory action from one PIC region in respect of diazinon meets the Annex II criteria, it will take no further action on the chemical at present.

Dichlorvos: On Tuesday, the Secretariat introduced the notification resubmitted by the EU ([UNEP/FAO/RC/CRC.21/7](#)) and supporting documents ([INF/17](#)).

Ech-Chayeb and Drafter Bart reported that the intersessional task group concluded the EU notification meets Annex II criteria.

Barlow, Sangster, Meliana, Ndiyo, Edmund, Sørvik Malme, Ali, Escriva, Bart, Pinas, Smit, Amichand, Granato, Motladiile, Marasinghe, Wodli, Prasad Paudel, Aluoch, and Andrejevic Stefanovic supported those conclusions.

An observer from the US and PAN UK agreed the notification meets criteria in Annex II, with the US applauding additional information that allowed for a quick agreement and PAN UK stressing that the previous notification submitted by the EU and

reviewed at CRC-20 already met the criteria and urged against setting the bar too high.

A contact group was established, co-chaired by Ech-Chayeb and Bart, to develop the rationale and draft a decision.

On Thursday, CRC members adopted the draft rationale (CRP.13) and draft decision (CRP.10) for the EU notification.

Final Decision: In its final decision (CRP.10), the CRC concludes that the EU notification of final regulatory action for chlorothalonil meets the Annex II criteria and adopts the rationale for the Committee's conclusion. The CRC notes that, as only a notification of final regulatory action from one PIC region in respect of dichlorvos meets the Annex II criteria, it will take no further action on the chemical at present.

Dicofol: On Wednesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/2](#)) and supporting information from Chile ([INF/18](#)), Peru ([INF/19](#)), Switzerland ([INF/20](#)), and Türkiye ([INF/21](#)). She noted that the Bureau reviewed the notifications from Chile, Peru, and Türkiye and the intersessional task group reviewed the notification from Switzerland.

On the Swiss notification, Ech-Chayeb and Bart reported that the intersessional task group found that most criteria were met, although views diverged on b(iii) because it was not clear that a risk evaluation was based on conditions of dicofol use in Switzerland. He also reported that the group viewed c(i), c(ii), c(iv) as not being met, because dicofol is listed in Annex A of the Stockholm Convention (elimination of production and use) and therefore the Swiss ban would not lead to a reduction in use (c(i)) or exposure (c(ii)), and there is no evidence of ongoing trade (c(iv)).

CRC members supported the assessment that the notification does not meet all the Annex II criteria.

Escriva queried whether c(iv) (evidence of international trade) could be met, given that there is incomplete information on international trade and, in similar circumstances, the Committee concluded that c(iv) was met. Ali agreed, suggesting that some countries continue to produce dicofol because not all countries ratified the Stockholm Convention amendment. Chair Gwayi observed that the Stockholm Convention is not universally ratified and suggested there could be ongoing trade. PAN UK agreed, saying that there may be countries where it is legal to import or export dicofol.

An observer from SWITZERLAND noted that the Rotterdam Convention is silent on whether the trade is legal or illegal, and since it cannot be ruled out that illegal trade is occurring, criterion c(iv) is met. An observer from the US recalled that the Rotterdam Convention is about obtaining prior informed consent during legal trade and does not address illegal trade.

Bart clarified that the Stockholm Convention was only part of the discussion of c(iv), and the task group also had no information of ongoing trade. An observer from NEW ZEALAND emphasized that there is no evidence of international trade based on submissions by ten countries.

An observer from IRAQ supported that the criteria were not met. CAMARA INDUSTRIA DE GUATEMALA said the criteria were not met, particularly given the lack of a risk evaluation.

On the notifications from Chile, Peru, and Türkiye, CRC members agreed with the Bureau's assessment that these notifications did not meet the criteria because these countries indicated that they had not undertaken a risk evaluation.

The contact group on dichlorvos and chlorothalonil was tasked to discuss the Swiss notification. Members agreed no further action would be taken on the notifications from Chile, Peru, or Türkiye.

On Thursday, members heard that the contact group did not view criterion b(iii) or criteria c(i), c(ii), or c(iv) as met. The Committee agreed that the Swiss notification did not meet the Annex II criteria and no further action would be taken.

Fenamiphos: On Tuesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/10](#)) and supporting information from the EU ([INF/23](#)).

Pinas and Marasinghe reported that the intersessional task group concluded that all the criteria were met for the EU notification. Members agreed the criteria were met.

On Thursday, Chair Gwayi introduced the draft rationale for the EU notification (CRP.14).

Final Decision: In its final decision, the CRC agrees that the notification from the EU meets the Annex II criteria and adopts the rationale. It notes that a notification from one PIC region in respect of fenamiphos meets the Annex II criteria, it will take no further action on the chemical at present.

Fipronil: On Tuesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/11](#)) and supporting information provided by Cabo Verde, Chad, The Gambia, Mauritania, Niger, Senegal, and Togo, for the Comité permanent inter-États de Lutte contre la Sécheresse dans le Sahel (CILSS) ([INF/25](#)), the EU ([INF/26](#)), and Türkiye ([INF/27](#)).

Pinas and Escriva reported that the intersessional task group concluded that the CILSS notification did not meet criterion b(iii) because there was no data on exposure in these countries and no bridging information showing that risks were considered under the prevailing conditions of use.

CRC members, supported by observers from ARGENTINA, GUATEMALA, and CROPLIFE INTERNATIONAL, agreed that the criteria were not met. PAN UK noted that the CILSS countries stated they had undertaken a risk evaluation and suggested that the Committee request this information.

Wodli, Sangster, Ndiyo, Escriva, and Bart noted that while the notifications from CILSS do not meet the Annex II criteria, the meeting report should state that if these countries wish, they may submit a new notification with additional information on exposure.

On the notification from the EU, Barlow, Ech-Chayeb, Bart, Sangster, Vashishtha, Aluoch, Sørvik Malme, Meliana, Smit, Amichand, Escriva, Ali, and Ndiyo agreed with the Bureau's assessment that criterion b(iii) was not met. An observer from GUATEMALA noted that no risk assessment was conducted, and fipronil's registration in the EU simply expired, and therefore, criteria b(ii) and b(iii) were not met.

CROPLIFE INTERNATIONAL supported the Bureau's assessment that criterion b(iii) was not met.

PAN UK stated that the registration of fipronil expired because the applicant failed to provide a risk assessment and evaluate the implications of the chemical for bees, as requested by the European Food Safety Authority (EFSA), suggesting that this failure to provide information on chemical safety can be considered a form of risk evaluation.

On the notification from Türkiye, Escriva, Sangster, Bart, Barlow, Vashishtha, Smit, Wodli, Ndiyo, Meliana, Ali, Sørvik Malme, and Vásquez Morera, agreed with the Bureau's assessment that criterion b(iii) was not met.

An observer from ARGENTINA noted that no risk evaluation was conducted, and therefore, the notification does not meet criterion b(iii). CROPLIFE INTERNATIONAL supported Bureau's assessment that criterion b(iii) was not met.

Chair Gwayi noted general agreement that no notification on fipronil meets the criteria of Annex II, and therefore no further action will be taken on this chemical. She stressed that the meeting report will note that if additional information is available, the CILSS countries can submit a new notification.

Methiocarb: On Tuesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/13](#)) and supporting documentation from the EU ([INF/29](#)).

A contact group was established to draft the rationale for the EU notification.

On Thursday, the CRC adopted the draft rationale for the EU notification (CRP.18) and draft decision (CRP.11).

Final Decision: In its final decision (CRP.11), the CRC concludes that the EU notification of final regulatory action for methiocarb meets the Annex II criteria and adopts the rationale for the Committee's conclusion. The CRC notes that as only a notification of final regulatory action from one PIC region in respect of diazinon meets the Annex II criteria, it will take no further action on the chemical at present.

Methomyl: On Wednesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/14](#)), and supporting documents from Chile ([INF/31/Rev.1](#)) and Uruguay ([INF/33](#)).

Pinas and Escriva presented on the deliberations of the intersessional task group. It concluded that notification from Chile meets all Annex II requirements, with criterion b(iii) requiring further discussion. On the notification from Uruguay, the task group agreed that it does not meet criteria b(i), b(ii), and b(iii) of Annex II.

On the notification from Chile, Barlow and Bart expressed concerns over using maximum residue limits (MRLs) as a basis for risk evaluation and suggested a contact group to discuss evidence of acute poisonings.

Ali, Sangster, Sørvik Malme, Amichand, Wodli, Pinas, Smit, Ech-Chayeb, Motladiile, Edmund, Sinhaseni, Andrejevic Stefanovic, Prasad Paudel, Ndiyo, Escriva, and Aluoch stated that based on the whole dataset and data on poisonings, criterion b(iii) was met, with many also supporting further discussion in a contact group to reach consensus. Sørvik Malme noted that EFSA peer review can be considered as bridging information, and Wodli acknowledged that "better language" can be found on MRLs.

An observer from the US stated that a large amount of information was not available in English, making it unclear how EFSA information was used. They also noted it was not possible to confirm data on acute poisonings, and that MRL exceedances should not be considered as part of a risk evaluation.

CAMARA DE INDUSTRIA DE GUATEMALA stated that criterion b(iii) was not met, since Chile did not provide sufficient data on risk evaluation. They noted that MRL exceedances do not represent exposure, pointed out the lack of substance-specific data on nature, exposure, severity, and recovery in instances of acute poisonings, and stated that the EFSA report is insufficient, requiring bridging data.

An observer from BRAZIL confirmed that national data show the toxicity of methomyl to bees, birds, and aquatic life, and supported further discussion, especially on the use of MRLs to indicate exposure as part of a risk evaluation.

An observer from NEW ZEALAND welcomed further discussion on MRLs, stressing it is relevant for a few other chemicals under review, and raised questions on how poisoning incidents were recorded.

An observer from CHINA stated that regulatory action was not taken based on the risk assessment, as there are no details on how the review was conducted, and how the data was selected and used.

PAN UK agreed that criterion b(iii) was met, stating that MRLs can be part of the risk evaluation under the Convention and noting other aspects like poisoning cases and the EFSA report.

On the notification from Uruguay, Sangster, Bart, Ndiyo, Motladiile, Barlow, Ali, Vashishtha, Meliana, Wodli, Sørvik Malme, Smit, Ech-Chayeb, Andrejevic Stefanovic, Amichand, Escriva, Prasadika Marasinghe, and Pinas agreed that criteria b(i), b(ii), and b(iii) of Annex II were not met. Wodli and Escriva, echoed by PAN UK, noted that the CRC should give Uruguay clear guidance on what data is missing from the notification in case they wish to resubmit.

Chair Gwayi explained that the Secretariat already requested additional information from Uruguay and did not receive a response. Wodli reiterated that he agrees the current notification does not meet the Annex II criteria but wants the deliberations in plenary and the assessment of the task group to be communicated to Uruguay to guide them in case they want to submit an updated notification.

Chair Gwayi noted agreement that the notification from Uruguay does not meet the Annex II criteria. She suggested the contact group tasked with methyl-parathion also review notifications on methomyl from Mozambique and Chile.

On Friday, the Committee adopted the draft rationale (CRP.25) and draft decision (CRP.28) for the notification from Chile.

CAMARA DE INDUSTRIA DE GUATEMALA said that there was insufficient information to meet b(iii) because Chile conducted a review of intake exceedances only and it was unclear how the review was conducted or what data was considered or applied.

Final Decision: In its final decision (CRP.28), the CRC agrees that the notification from Chile meets the Annex II criteria and adopts the rationale. It notes that as only a notification from one PIC region in respect of methomyl meets the Annex II criteria, it will take no further action on the chemical at present.

Methyl-parathion: On Tuesday, the Secretariat introduced notification ([UNEP/FAO/RC/CRC.21/15/Rev.1](#)) and supporting documentation from Brazil ([INF/34](#)). They also introduced the notification from the EU that the CRC previously agreed met the criteria ([INF/35](#)).

Pinas and Prasadika reported that the intersessional task group found that the notification met the requirements of Annex II, although she noted that criterion b(iii) was "open." She outlined that Brazil banned production, use, trade, import, and export of methyl-parathion because it is extremely neurotoxic and mutagenic, causing damage to reproductive systems, with potential exposure risks to the population.

Escriva, Smit, Ndiyo, Wodli, Ali, Meliana, Edmund, Ech-Chayeb, Amichand, Pinas, and Sørvik Malme said that they view criterion b(ii) as met, citing information in Brazil's documentation related to some instances of exposure, and also that a national risk evaluation was conducted that concluded that the risks to humans were higher than to laboratory animals.

Barlow, Bart, Vashishtha, Aluoch, Sinhaseni, Sangster, and Motladiile welcomed further discussion but expressed concerns about whether criterion b(iii) was met, given a lack of information

about exposure. Some queried the use of MRLs as an indication of exposure risk. Vashishtha stated that information was provided late to members and that risk evaluation did not relate to the prevailing conditions of use in Brazil.

PAN UK emphasized that Brazil's legislation requires a risk evaluation that considers potential exposure and hazards, and that the information provided used poisoning data to demonstrate exposure, hazard levels, and other conditions of use.

An observer from SWITZERLAND said that MRL levels are set to ensure there is no risk to consumers, and an exceedance of an MRL, given the pesticide is mutagenic, could be interpreted as indicating both a hazard and a potential exposure.

An observer from the US recalled that CRC-13 agreed that MRL exceedances did not constitute a risk evaluation. CAMARA INDUSTRIA DE GUATEMALA and CROPLIFE INTERNATIONAL stressed that MRLs are not toxicological endpoints and do not assess risk, but are instead compliance measures to ensure substances are appropriately used.

An observer from BRAZIL reported that the final regulatory action was based on an extensive survey that, combined with the toxicological characteristics of the chemical, led to the conclusion that it is mutagenic and more toxic to humans than laboratory animals. He further noted that it is already banned in several countries.

Escriva welcomed Brazil's explanation that the survey and analysis were done according to Brazil's national policy and said that while MRLs cannot alone constitute a risk evaluation, he would welcome discussion if b(iii) is met given the range of information available.

A contact group was established, chaired by Pinas, to discuss the notification.

Chair Gwayi reminded members that the criterion is a risk evaluation, not a risk assessment, and does not require as much data as a risk assessment.

On Friday, the Committee adopted the rationale (CRP.19) and decision (CRP.22) related to the Brazilian notification. It also adopted the draft workplan to prepare a draft DGD for the COP's consideration (CRP.21).

Final Decision: In its final decision (CRP.22), the CRC concludes that the notification submitted by Brazil meets the Annex II criteria and adopts the rationale for the Committee's conclusion. The CRC recommends that the COP list methyl-parathion in Annex III to the Convention as a pesticide and decides to prepare a draft DGD.

Phenthoate: The Secretariat presented the notification ([UNEP/FAO/CRC.21/16](#)) and supporting information ([INF/36](#)), recalling that no agreement was reached at CRC-20 and that additional information was requested from Malaysia.

Barlow, Vashishtha, Bart, Sangster, Aluoch, Motladiile, Ndiyo, and Sinhaseni stated that b(iii) is not met. Many elaborated on default MRL exceedances not being enough as a risk evaluation, especially in the absence of context like frequency, magnitude, and consequences.

Smit and Escriva, while agreeing that criterion b(iii) is not met, cautioned against blanket dismissal of MRL exceedances as forming part of a risk evaluation, suggesting a case-by-case approach. Wodli stated that criterion b(iii) is met, citing additional information, including monitoring data and a survey on pesticide use.

PAN UK, citing various statements on risk from additional information submitted by Malaysia, stressed that every country

approaches risk evaluation differently and stated criterion b(iii) was met.

An observer from the US, echoed by PESTICIDES MANUFACTURERS OF INDIA, stressed that MRLs do not indicate risk since the values are set on a much lower level than it would be for toxicity to enforce compliance with regulations. CAMARA DE INDUSTRIA DE GUATEMALA and CROPLIFE INTERNATIONAL stressed that MRLs are not toxicological end points and indicate misuse, hence criterion b(iii) is not met. They cited the precedent of triazophos, which was set aside by the CRC in 2017 in a similar situation.

Smit thanked observers from the US and CROPLIFE INTERNATIONAL for their comments on MRLs, observing that the risk assessments have higher data thresholds, such as toxicological endpoints, than risk evaluations. She cited the example of methamidophos, which was recommended by CRC-10 for listing in a similar situation, and urged against generalizations regarding MRLs.

Chair Gwayi noted the divergence of views and proposed to come back to this later in the meeting.

On Friday, members agreed to defer the consideration of phenthoate to CRC-22.

Profenofos: On Thursday, the Secretariat presented the notification ([UNEP/FAO/RC/CRC.21/17](#)) and supporting documents from Malaysia ([INF/37](#)). Chair Gwayi invited comments on criterion b(ii), on which members could not reach agreement at CRC-20.

Sangster, Bart, Barlow, Vashishtha, Aluoch, Ech-Chayeb, Ndiyo, and Edmund stated that criterion b(iii) was not met, since the notification relies on MRL exceedances, which alone do not constitute a risk evaluation. Some members specified that MRLs are intended to identify when agricultural practices are not followed, rather than assessing risk. They also noted that, despite Malaysia providing additional information, the new data still could not support risk evaluation as a basis for regulatory action.

Wodli and Smit disagreed, echoed by PAN UK, stating that MRL exceedances might serve as a basis for regulatory action under national jurisdiction, and that profenofos has an MRL set by the FAO's Codex Committee on Pesticide Residues that indicates safety for consumers. Edmund specified that Codex MRLs are primarily designed for trade, although health considerations are also taken into account.

An observer from the US stressed that MRLs do not represent risk, and that Malaysia used the default, not the Codex MRL value. Stressing that criterion b(iii) was not met, they, with CAMARA DE INDUSTRIA DE GUATEMALA, urged the CRC to follow the precedent established by the review of triazophos at CRC-13 in 2017 and conclude that MRL exceedance does not constitute risk evaluation.

PESTICIDES MANUFACTURERS OF INDIA stressed that Codex MRLs are a trade measure and, echoed by the observer from BRAZIL, noted that MRLs are not a basis for risk evaluation, therefore criterion b(iii) is not met. CROPLIFE INTERNATIONAL said criterion b(iii) is not met and reported that the Codex MRL would have to be exceeded tenfold to have health implications, according to their research.

Chair Gwayi observed differing views and postponed further deliberations in plenary.

On Friday, the CRC agreed to defer consideration of this notification to CRC-22.

Quinalphos: On Thursday, the Secretariat presented notification ([UNEP/FAO/RC/CRC.21/19](#)) and supporting information ([INF/39](#)), informed that no agreement was reached at CRC-20, and additional information was requested from Malaysia.

Sangster, Barlow, Bart, Vashishtha, Aluoch, Granato, Motladiile, Edmund, Amichand, Ech-Chayeb, and Ndiyo said criterion b(iii) was not met. Escriva stated that criterion b(iii) is not met due to the default MRLs used, but was open to further discussion.

Smit stated she had not yet decided on her position given that quinalphos is a World Health Organization (WHO) Category I pesticide, which makes it a different case compared to other notifications from Malaysia, even though default MRLs were used. Sinhaseni reminded that for criterion b(iii), members agreed to consider neuropathy endpoints, which are delayed for this chemical. Wodli stated criterion b(iii) was met.

PESTICIDES MANUFACTURERS OF INDIA and CROPLIFE INTERNATIONAL stated criterion b(iii) is not met, since MRLs are based on the adhering to good agricultural practices, not toxicity.

PAN UK stated criterion b(iii) is met.

Chair Gwayi noted the divergence of views and proposed to come back to this later in the meeting.

On Friday, the CRC agreed to defer its consideration of quinalphos to CRC-22.

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 project involved a national survey of farmers 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, some pesticides were shortlisted for further stakeholder consultations, where pesticides were discussed individually, and some were banned due to those consultations.

Carbyl: On Thursday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.21/3](#)) and supporting information from Mozambique ([INF/7](#)).

Sangster drew attention to the process followed for the FAO project, especially noting that pesticides were shortlisted and were then assessed for actual use and exposure under local conditions, which he said met criterion b(iii). Wodli, Ali, Smit, Motladiile, Vashishtha, Pinas, Ech-Chayeb, Sørvik Malme, Edmund, Escriva, and Andrejevic Stefanovic agreed that this shortlisted pesticide meets criterion b(iii). Ndiyo concurred, also citing the lack of available personal protective equipment, which is required by the US and other countries for safe use.

PAN UK cited information submitted late in 2024 that relayed the discussions at stakeholder meetings held during the FAO project, which could suggest that chemicals that were not shortlisted could also meet criteria b(iii). An observer from ARGENTINA underlined that the shortlist was not decided according to recognized scientific methods. An observer from the US cautioned against assuming that shortlisted chemicals were subject to a risk evaluation because the survey did not assess exposure to all the pesticides separately.

Sinhaseni requested the additional information mentioned by PAN UK and asked for a contact group to discuss this information.

CAMARA INDUSTRIA DE GUATEMALA and CROPLIFE INTERNATIONAL stressed that carbaryl was part of a general

pesticide survey. An observer from GUATEMALA suggested setting this notification aside.

Chair Gwayi observed general agreement among members that the notification meets the criteria. A contact group, co-chaired by Edmund and Granato, was tasked with drafting the rationale for this notification.

On Friday, the Secretariat introduced the draft rationale (CRP.26) and decision (CRP.23) that the notification from Mozambique meets the criteria. They also introduced the draft workplan to prepare a draft DGD (CRP.21).

Sinhaseni recalled that PAN UK had noted additional information was available and the contact group was asked to consider this information but stated that it wasn't considered in the contact group. She said she could not agree to the rationale at this time. The Secretariat said that the additional information was included in [INF/22](#). Vashishtha shared his understanding that the contact group would discuss this information, as Sinhaseni had requested.

Edmund recalled that the contact group was given a mandate only to consider the draft rationale, because there was an understanding that all the criteria were met. Sinhaseni reported that she did inform the contact group that she did not view criterion b(iii) as met.

An observer from ARGENTINA underlined that the notification did not meet the criteria for proper scientific assessment (b(ii)).

An observer from the US said that the case for this notification to meet the criteria is "quite weak" and said the process used by Mozambique was appropriate for its domestic purposes but did not align with the standards of rigour for the Rotterdam Convention.

CROPLIFE INTERNATIONAL reiterated its concern about the Mozambique notification, stressing that the general farmer's survey did not meet criterion b(iii).

CAMARE DE INDUSTRIA DE GUATEMALA lamented that the Committee accepted this notification met criterion b(iii) because it was based on a general pesticide survey, regardless of whether it was shortlisted in the project.

PAN UK rejected the suggestion that an HHP classification is relevant to this Committee's work, characterizing the argument as an attempt to obfuscate the spirit of the Convention.

After a break, members agreed to defer consideration to CRC-22.

Chlorfenvinphos: On Thursday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.21/4](#)), and supporting information from Mozambique ([INF/9](#)).

Sangster, Barlow, Escriva, Bart, Vashishtha, and Wodli said that criterion b(iii) is not met because the substance is only registered for veterinary use, and the farmer's survey did not ask about exposure from these uses.

Smit noted that additional information was provided by Mozambique that says that the use of chlorfenvinphos was assessed for veterinary uses and said b(iii) is met. Amichand noted that farmers often also have livestock and farmers surveys often pick up information about these uses. Ali noted that the survey was done with subsistence farmers, who use the resources available to them, regardless of the registered use.

Sangster appreciated Mozambique's response to the CRC's request for additional information but recalled there was no data collection or mention of veterinary uses from the survey results and queried if the additional information would meet criterion b(ii) (data generated according to recognized scientific methods). Escriva, Ndiyo, and Aluoch said it was difficult from the additional information to identify how exposure occurred and evaluated, and

Vashishtha said that the information was too broad to help make a determination that b(iii) is met.

An observer from the US agreed that the veterinary use information was insufficient and said that information related to the availability of personal protective equipment is not relevant.

CAMARA INDUSTRIA DE GUATEMALA required further information on veterinary uses to satisfy b(iii).

An observer from GUATEMALA, an observer from the US, and CROPLIFE INTERNATIONAL said it is time to set this notification aside given the lack of consensus, noting that the CRC set aside the EU's notification on atrazine after it had not found agreement after three meetings. PAN UK disagreed, noting that several notifications have been carried forward in the absence of consensus. He emphasized that farmers are acting as veterinarians on a daily basis and stated that the additional information clearly indicates that the survey did include veterinary use.

The contact group for the CRC-20 Mozambique notifications addressed this chemical.

On Friday, the Committee concluded that the notification from Mozambique does not meet criterion b(iii) and no further action will be taken on this chemical at present.

Diazinon: The Secretariat presented the notifications ([UNEP/FAO/CRC.21/6](#)) and supporting documentation from Mozambique ([INF/14](#)).

Escriva, Motladiile, Bart, Vashishtha, Meliana, Smit, Wodli, Barlow, Granato, and Prasadika Marasinghe agreed with the task group that the notification did not meet criterion b(iii). Escriva, Vashishtha, and Smit highlighted that diazinon was not shortlisted for the second stage of the study in Mozambique, which evaluated risks, and it is only registered for veterinary use.

CROPLIFE INTERNATIONAL supported the task group's conclusions that criterion b(iii) of Annex II was not met, reiterating that diazinon is not registered for plant protection, but for veterinary use. CHINA noted there is not enough information related to risk assessment.

PAN UK stressed they believe notification from Mozambique meets criterion b(iii) of Annex II, since diazinon was banned after consultations with stakeholders, where risks were discussed. They also lamented that the task group agreed that criterion c(iii) on reduced risks was met, which can only happen if the chemical does indeed pose risks.

On Friday, the Committee concluded that the notification from Mozambique does not meet criterion b(iii), and no further action will be taken on this chemical at present.

Ethion: On Thursday, the Secretariat presented notification ([UNEP/FAO/CRC.21/9](#)) and supporting documents from Mozambique ([INF/22](#)), informed that no agreement was reached at the previous CRC meetings, even after Mozambique provided additional information as requested by CRC-19. Ali, citing rational use as Mozambique's justification for regulatory action, stated that criterion b(iii) was met.

Sangster, Barlow, Vashishtha, Bart, Wodli, Meliana, Edmund, Sørvik Malme, Aluoch, and Granato, recalling that ethion was not shortlisted for the second stage of the FAO project and is only registered for veterinary use, said criterion b(iii) was not met.

PAN UK said that the additional information from Mozambique states that in stakeholder consultations, the risks of ethion in particular were discussed, including exposure from water from animal baths when they were drained.

The PESTICIDES MANUFACTURERS OF INDIA stated that criterion b(iii) was not met, and observers from GUATEMALA and the US urged the CRC to set aside this notification if the members cannot reach consensus at this meeting, since it does not meet criterion b(iii).

Chair Gwayi tasked the contact group addressing CRC-20 Mozambique notifications to discuss ethion.

On Friday, the Committee concluded that the notification from Mozambique does not meet criterion b(iii) and no further action will be taken on this chemical at present.

Fenamiphos: On Tuesday, the Secretariat introduced the notification ([UNEP/FAO/RC/CRC.21/10](#)) and supporting information ([INF/24](#)).

Marasinghe reported that the intersessional task group viewed all the criteria as being met, except for criterion b(iii) because there was no specific information related to actual or measured exposure of agricultural workers in Mozambique, but it instead provides a general evaluation of pesticide use in the country.

Sangster, Barlow, Sinhaseni, and Vashishtha said that b(iii) was not met because there is no evidence provided of use, and therefore exposure, in Mozambique. Barlow also noted that fenamiphos was not shortlisted for further action during the FAO project due to a lack of data showing that it had been imported.

Amichand and Edmund suggested the criteria were met but called for further discussion considering the lack of evidence of use. Marasinghe suggested that if there was import and use data, then fenamiphos would have been shortlisted for further evaluation and, therefore, the criterion is met.

Smit, Ndiyo, and Ech-Chayeb said that b(iii) is met, pointing to the CRC Handbook guidance that says the CRC can conclude that b(iii) is met in the case where a country has a national policy to restrict a pesticide with a WHO hazard classification of 1A or 1B in anticipation of risks. An observer from the US suggested the CRC Handbook may not apply, because Mozambique does not have such a national policy and no information was provided that the regulatory action was taken in anticipation of health risks.

CROPLIFE INTERNATIONAL said the notifications from Mozambique result from a survey of farmers on pesticides in general. He lamented that limited resources are spent discussing these notifications despite the lack of consensus, and cautioned that this could undermine the integrity of the CRC process.

CAMARA INDUSTRIA DE GUATEMALA also observed that the notification lacks detail to allow proper identification of substance-specific risks because it is based on a general survey.

A contact group was established, co-chaired by Pinas and Escriva.

On Thursday, the contact group reported that it was unable to agree if b(iii) was met.

Sangster, Barlow, Bart, Pinas, Vashishtha, Motladiile, Aluoch, Meliana, Granato, and Sørvik Malme agreed that the evaluation was not met. They stated that only general information was available because fenamiphos was not shortlisted by the FAO project, and therefore, the regulatory action was not taken on the basis of a substance-specific risk evaluation. Barlow said only hazards were considered.

Smit underlined that the criterion was met because the pesticide has hazardous properties, and there was information related to protective equipment, which, she said, could together constitute a risk evaluation. Ali said that a risk evaluation was conducted, taking into consideration the use of these chemicals in Mozambique.

Wodli recalled that a stakeholder consultation guided the selection of pesticides for the shortlist and inquired whether information about the consultation could be requested. Chair Gwayi reported that additional information was requested but was not available.

Noting ongoing disagreement, Chair Gwayi suggested that members continue to engage informally.

On Friday, members agreed to defer consideration of fenamiphos to CRC-22.

Methidathion: On Thursday, the Secretariat presented the notification ([UNEP/FAO/RC/CRC.21/12](#)) and supporting information ([INF/28](#)) from Mozambique, informing that no agreement was reached at previous CRC meetings. They recalled that CRC-20 had requested additional information regarding the import of methidathion.

Sangster, Escriva, Barlow, Motladiile, Wodli, Bart, Ech-Sayed, Andrejevic Stefanovic, Amichand, Ali, Sørvik Malme, Ndiyo, Vásquez Morera, Meliana, Granato, and Edmund cited no import volumes, stating that criterion b(iii) was not met.

PAN UK stressed that there is no reason to believe methidathion will not be imported in the future and pointed out that regulatory action comes from stakeholder consultations. Noting that the CRC agreed that criterion c(ii) on risk reduction was met, they stated criterion b(iii) was therefore also met.

An observer from GUATEMALA called for putting the notification aside in case of no consensus among CRC members.

Chair Gwayi noted general agreement that criterion b(iii) is not met and stated that no further action on methidathion will be taken. Members agreed.

Methiocarb: On Tuesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/13](#)) and supporting documentation from Mozambique ([INF/30](#)).

Sangster reported that the intersessional task group viewed b(iii) as not met because methiocarb was not included on the shortlist of pesticides being assessed in the FAO project, where use and exposure surveys in the field and further hazard and risk assessments were conducted.

CRC members agreed that the notification did not meet the criteria, particularly since there was no data that the pesticide was imported after 2014, and, therefore, the likelihood of exposure is very low. Members thanked Mozambique for bringing the notification forward.

PAN UK queried how the Committee could note the lack of data on import and use, but also conclude that criterion c(i) and (ii) were met, meaning that the regulatory action is expected to lead to a reduction in the amount of pesticide used.

CROPLIFE INTERNATIONAL and CAMARA INDUSTRIA DE GUATEMALA noted that methiocarb was not shortlisted for the second stage of the FAO project on highly hazardous pesticides.

On Friday, the Committee concluded that the notification from Mozambique does not meet criterion b(iii) and no further action will be taken on this chemical at present.

Methomyl: On Wednesday, the Secretariat introduced the notifications ([UNEP/FAO/RC/CRC.21/14](#)), and supporting documents Mozambique ([INF/32](#)).

Pinas and Escriva reported that the intersessional task group could not decide on whether the notification from Mozambique meets the information requirements of Annex I because the final regulatory act was taken to ban one formulation of methomyl,

but the notification form is for methomyl generally, not the one formulation that was banned.

Chair Gwayi clarified that the CRC's mandate is to screen notifications against the criteria set out in Annex II, and discuss whether the notifications meet the criteria of Annex I falling outside the Committee's scope. Sangster, Escriva, Sørvik Malme, Wodli, Barlow, Ali, Aluoch, Bart, Vashishtha, Sinhaseni, Motladiile, Andrejevic Stefanovic, Smit, Ndiyo, Ech-Chayeb, and Edmund agreed with Chair Gwayi and suggested contact group discussions on whether the notification meets the Annex II criteria. Ndiyo stated that the notification meets the Annex II criteria.

An observer from SWITZERLAND stated that since methomyl was included in the second stage of the FAO project, which served as a risk evaluation, and substance-specific data is available, Annex II criteria are met.

An observer from the US supported having a contact group discussion, stating that the specific formulation in the regulation does not match the formulation in the supporting data.

PAN UK agreed that assessing Annex I is not in the CRC's mandate and stressed that the task group concluded that all Annex II criteria have been met.

On Friday, the Committee concluded that the notification from Mozambique does not meet criterion b(iii), and no further action will be taken on this chemical at present.

Thiodicarb: On Thursday, the Secretariat presented notification ([UNEP/FAO/CRC.21/20](#)) and supporting information ([INF/40](#)), informing that no agreement was reached at previous CRC meetings. They recalled that the EU notification on this pesticide met the Annex II criteria as reviewed by CRC-17 and set out in [UNEP/FAO/RC/CRC.19/INF/27](#).

Escriva explained that based on its formula and properties, thiodicarb quickly degrades to methomyl. Noting that while thiodicarb was not shortlisted for the second stage of the study, methomyl was, and citing registered import, Escriva stated that criterion b(iii) was met and asked for further discussions. Wodli asked if it is possible to request additional information from Mozambique to confirm whether exclusion of thiodicarb from the second stage of the study was based on the logic outlined by Escriva. Chair Gwayi responded that the CRC can only ask for potentially omitted data and cannot ask a country to justify its decisions.

Sangster, Barlow, Vashishtha, Bart, Motladiile, Aluoch, Ndiyo, and Ali stated that criterion b(iii) was not met since the chemical was not shortlisted for stage two, and there was no import at the time of the survey.

Observers from ARGENTINA, GUATEMALA, and BRAZIL underlined that the notification does not meet criterion b(iii) and called the CRC to set aside the notification if no consensus is reached at this meeting.

CROPLIFE INTERNATIONAL and CAMARA DE INDUSTRIA DE GUATEMALA stated that there was no import evidence during time of the survey, thiodicarb was not shortlisted for the second stage of the study, an HHP, therefore criterion b(iii) was not met.

PAN UK noted that classification of HHPs is irrelevant for the CRC's decision-making, echoing Escriva and stating criterion b(iii) was met.

Chair Gwayi noted divergence of views, and suggested that the contact group on carbaryl also discuss thiodicarb, as well as fenamiphos.

On Friday, the Committee concluded that the notification from Mozambique does not meet criterion b(iii), and no further action will be taken on this chemical at present.

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 four 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.

On Wednesday, the Secretariat presented intersessional work on the SHPF forms ([UNEP/FAO/CRC.21/21](#)), the revised human health incident report form ([INF/41](#)), the revised environmental incident report form ([INF/42](#)), and the revised collection of examples of SHPFs reviewed by the CRC ([INF/43](#)).

Chair Andrejevic Stefanovic and drafter Sørvik Malme presented outcomes of the intersessional task group's work. A few revisions were proposed by the task group, including adding examples on applying the criteria to list an SHPF. Additionally, task group proposed to harmonize and revise the Environmental Incident Report form and Human Health Incident Report form, to better collect necessary information. One suggestion is to include two paragraphs on "What is a human health incident" and "What is a SHPF?" in the human health incident report.

Commenting on the revised human health incident report form, Sangster, Bart, Ali, Sinhaseni, Aluoch, Smit, Escriva, Ndiyo, and Marasinghe welcomed the task group's work, noting that more time is needed to better understand the suggested revisions. Sinhaseni also noted that it is important to coordinate with poison control centers and for FAO to participate, as well as to gather input from relevant parties on the form itself.

An observer from BRAZIL noted that improvements to the form will help parties understand what information is needed, and CROPLIFE INTERNATIONAL found it useful for the CRC's work moving forward.

PAN UK stated that the revised form does help with data collection, but there still might be information deficits based on how the CRC interprets the Convention, particularly regarding the criterion to show significant effects in relation to the quantity of the formulation used.

CAMARA DE INDUSTRIA DE GUATEMALA reiterated the suggestion to use a poisoning severity scoring scheme to assess whether the substance is an SHPF, and a method to assess the reliability of data as used by poison centers.

Commenting on the revised environmental incident report form, Sangster, Bart, Ali, Ech-Chayeb, Vashishtha, Aluoch, and Ndiyo welcomed work done, with many suggesting further discussion on the specific edits proposed by the task group. Sangster and a few others noted the importance of getting input from the Parties on the usefulness of the revised form.

An observer from BRAZIL stated the revised form will strengthen the review process by the CRC.

Commenting on the revised collection of examples, Sangster, Bart, Barlow, Escriva, Wodli, Marasinghe, Ndiyo, Aluoch, and Vashishtha commended the excellent work by the task group, noting that no further discussion is needed.

An observer from KENYA applauded the work of the task group and called for similar work to be done for industrial chemicals.

Observers from the US and CHINA welcomed the collection of examples, noting that the new forms will have a positive impact on the CRC's work.

PAN UK highlighted a few remaining gaps, including a lack of understanding whether: all criteria need to be met; "significance of effects" applies to farmers only or also to the broader population; quantity used applies to the active ingredient or overall formulation; and the difference between "significance and severity."

Sinhaseni echoed the last point of PAN UK, stating that clear definitions of "significance" and "severity" are needed to improve decision-making.

Chair Gwayi proposed to take note of the collection of examples and request the Secretariat to do editorial work and update the CRC Handbook accordingly. She suggested establishing a contact group to further discuss the two forms, with Andrejevic Stefanovic as Chair and Sørvik Malme as drafter.

On Friday, Andrejevic Stefanovic reported that the contact group had concluded its review and revised the forms but said that some members thought the health and environmental incident forms should be harmonized, including by asking similar questions.

Chair Gwayi proposed, and members agreed, to continue this work intersessionally with a mandate to harmonize the formatting, layout, and, if necessary, the content of the forms. The CRC also agreed to ask the Secretariat to update the collection of examples of SHPF reviews in light of the three proposals reviewed at this meeting.

Cypermethrin emulsifiable concentrate 10%: On Wednesday, the Secretariat introduced the SHPF proposal from Lao People's Democratic Republic (PDR) ([UNEP/FAO/RC/CRC.21/22](#)) and the information collected by the Secretariat ([INF/44](#)).

Sangster, Bart, Vashishtha, and Barlow cited previous CRC reviews of SHPF proposals and stated that they did not consider skin irritation and other reported effects in this proposal to be as severe as in the previous SHPFs reviewed.

Bart and Barlow expressed concern that the proposal did not document a causal link between the pesticide formulation and the reported effects, as there was a lack of clarity regarding which formulation was used.

An observer from ARGENTINA noted that the formulation was obtained through illegal trade and did not meet the criteria to be listed as an SHPF.

PAN UK observed that severity is not used in the criteria for SHPFs, and it is not up to members to assess. He also noted that illegal trade is not part of the criteria.

CAMARA INDUSTRIA DE GUATEMALA cited "non-specific" effects and questioned the reliability of the evidence that the use of the substance resulted in the reported effects.

PESTICIDE MANUFACTURERS INDIA said that the pesticide was illegally imported and was likely of poor or compromised quality. He stressed that the criteria were not met.

CROPLIFE INTERNATIONAL said it is inappropriate to propose an SHPF for formulations that are not registered in the notifying country and suggested use was illegal with an unknown concentration.

An observer from BRAZIL raised concerns about illegally traded formulations, citing the lack of transparency in their composition. He suggested pre-screening of SHPF proposals to ensure the reliability of the information provided.

Sinhaseni confirmed that the formulation is registered for use in Thailand and that it can be commonplace for Laotian users to purchase it in Thailand.

CRC members agreed to set aside the proposal.

Cypermethrin emulsifiable concentrate 35%: On Wednesday, the Secretariat introduced the SHPF proposal from Lao PDR ([UNEP/FAO/RC/CRC.21/23](#)) and information gathered by the Secretariat ([INF/45](#)).

Sangster, Barlow, Bart, Vashishtha, Edmund, Escriva, Aluoch, and Ndiyo stated that the criteria are not met because the formulation exceeds the recommended concentrations and still does not produce significant effects. An observer from the US agreed with members' views that the criteria were not met.

Sangster and Vashishtha stated Part A is not met because the formulation was not in its original container and it is not clear what exact formulation was used.

PAN UK queried how the significance of effects could be assessed in relation to the volume of the formulation used given that there was no information regarding volume. They cited previous CRC members' willingness to discuss population and socioeconomic effects, noting that survey that identified the health effects could be extrapolated to represent a high percentage of the overall population of farmers in Lao PDR.

An observer from ARGENTINA said the identity of the formulation used and the significance of the effects were questionable. PESTICIDES MANUFACTURERS OF INDIA underlined that it was unclear what product was used.

CAMARA INDUSTRIA DE GUATEMALA cited a lack of reliability that the use of the cited formulation caused the reported incidents, and questioned if the incidents are relevant to other countries' circumstances.

CROPLIFE INTERNATIONAL maintained that the criteria are not met, particularly because the formulation was not used in accordance with accepted practice.

An observer from GUATEMALA said the criterion for significant effects is not met.

The CRC agreed to set this proposal aside.

Emamectin benzoate water soluble granules 5%: On Wednesday, the Secretariat introduced the proposal from Lao PDR ([UNEP/FAO/RC/CRC.21/24](#)) and supporting information gathered by the Secretariat ([INF/46](#)).

Sangster, Barlow, Bart, Vashishtha, Escriva, and Motladiile said that the proposal did not meet the criteria for significant effects. Escriva expressed his appreciation for these SHPF notifications from Lao PDR, particularly because they prompted the committee to reflect and revise the SHPF forms.

An observer from ARGENTINA stressed that the proposal involved a single incident related to an unregistered product.

CROPLIFE INTERNATIONAL maintained that several of the criteria were not met. CAMARA INDUSTRIA DE GUATEMALA expressed the same reservations as the other SHPF proposals, and said it could not be recommended for listing.

PAN UK stated that these SHPF proposals from Lao PDR highlight significant issues with pesticide use in Lao PDR and expressed concern that the Annex IV criteria in the Convention may not adequately accommodate these notifications.

PESTICIDE MANUFACTURERS OF INDIA said that the criteria were not met, and this formulation, when used appropriately, would not produce significant effects.

The CRC agreed to set this proposal aside.

Venue and Dates of CRC-22

CRC-22 will take place from 29 September to 2 October 2026 in Rome, Italy.

Other Matters

Updated Indicative List of Substances Covered by PFOA, Its Salts, and Related Compounds: On Friday, the Secretariat introduced the updated indicative list ([UNEP/FAO/RC/CRC.21/INF/47](#)). She reported that the Stockholm Convention listed long-chain perfluorocarboxylic acids, some of which may degrade to PFOA, and explained that the Stockholm Convention listing for LC-PCFA excludes PFOA compounds to avoid duplication. The CRC took note of the information.

Effective Participation: On Friday, the Secretariat reported that the COP requested the Secretariat to continue implementing training activities for new CRC members, and relayed that an in-person orientation workshop was included in the next biennial budget. They further reported on the training provided, including for drafting CRC documents and chairing meetings.

Escriva and Sangster suggested that the page numbers be indicated for the various documents and that the English versions be put at the beginning in cases where supporting information has been translated.

Bart, Wodli, Vashishtha, Ali, and Ech-Chayeb thanked the Secretariat for their efforts to support members and noted the value of the in-person and online training sessions. Ech-Chayeb suggested further capacity building on assessing SHPF proposals.

PAN UK suggested that the Committee could discuss whether further guidance is needed on how to interpret some of the Convention's criteria and SHPF proposals.

Intersessional Work on Notifications of FRA: On Friday, the Secretariat reported that as of June 2025, there were 25 new notifications. Saying there is a substantive amount of work ahead, they noted that the Bureau will discuss the plan for prioritizing notifications and undertaking intersessional work.

Closure of the Meeting

On Friday, the Committee adopted its report (UNEP/FAO/RC/CRC.21/L.1) with minor clarifications related to some observers' comments.

Abiola Olanipekun, Chief of the Science and Technical Assistance Branch, Basel, Rotterdam and Stockholm Conventions Secretariat, delivered closing remarks on behalf of Co-Executive Secretary Payet and expressed gratitude to everyone involved in CRC-21, including outgoing Chair Gwayi.

Co-Executive Secretary Fuell highlighted the meeting's outcomes, including a decision on methyl-parathion and adoption of the work plan to prepare its DGD. Noting that not every notification met the requirements of Annex II, she stressed that each is important as they signal compliance with the Rotterdam Convention. She praised outgoing Chair Gwayi for her fair and inclusive leadership.

Chair Gwayi, reflecting on her eight-year tenure, praised the CRC members for their dedication to tackling the Committee's ever-growing workload. She also commended observers, noting how the CRC has become much more inclusive and transparent. She stressed that CRC mandate is defined by the COP, and its scope cannot be widened. Chair Gwayi also warmly welcomed incoming Chair Sangster and gavelled the meeting to a close at 1:37 pm.

A Brief Analysis of CRC-21

Information is a powerful resource. It supports policy decisions that protect human health and the environment. Delegates who negotiated the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade were acutely aware that many countries lacked this resource. The treaty is designed to provide information to importing countries and help them make decisions about whether to import or how to safely manage hazardous chemicals. Serving the needs of developing countries is, in Chair Noluzuko Gwayi's words, "the spirit of the Convention."

The Chemical Review Committee (CRC) oversees a unique process that operationalizes this spirit. Rather than assess the hazards of a chemical, the process is about country-to-country signalling and information sharing. When a country bans or restricts a chemical, it shares its reasoning behind this "final regulatory act." Or countries share concerns about severely hazardous pesticide formulations by documenting incidents in a proposal. The Convention's architects sought to ensure all countries could signal their worries by minimizing the information requirements.

At CRC-21, the challenge was not the amount of information provided, but whether the right information was contained in the reams of supporting documentation. The Convention's criteria still seek to ensure that a global response is appropriate. The set of criteria in the Convention are broadly worded, but exist to make sure that one country's experiences with a chemical are relevant to other countries, and a global information exchange would be beneficial.

This brief analysis explores how CRC members evaluated notifications against the vaguely worded Convention criteria, particularly at a time when the Convention's work on pesticides is gaining renewed significance and attention. All the chemicals under CRC's consideration this year were pesticides. A CRC recommendation to list, if accepted, would qualify the pesticides as highly hazardous pesticides (HHP) under the FAO International Code of Conduct on Pesticide Management. HHPs are to be eliminated under the Global Framework on Chemicals. The CRC works to interpret the Convention while recognizing its purpose to serve the needs of developing countries.

Navigating Legal Uncertainty

Those who negotiated the Rotterdam Convention left a legacy of undefined terms that the CRC has had to interpret on a case-by-case basis. The vague terms were the result of political decisions to facilitate the participation of developing countries. CRC members are technical experts, less versed in political compromises, and often preferring clear-cut information requirements. Two terms stood out for members at this meeting: "risk evaluation" and "significant" effects.

The Convention says that a final regulatory act must be based on a risk evaluation. As an observer recalled, the term was chosen during the negotiations to help developing countries participate in the Convention's signalling mechanism. Then, as now, many

countries lacked the capacity to conduct risk assessments, which involve gathering toxicological exposure data through blood or serum tests, for example. Risk assessments represent a high bar for data collection. A risk evaluation is something different, involving less stringent requirements, as Chair Gwayi reminded members throughout the meeting.

For many members, a risk evaluation consists of two parts: hazard and exposure, based on the "prevailing conditions of use in the country." A notifying country doesn't have to identify the chemical's hazardous properties; it can rely on other countries or international organizations. For example, the World Health Organization identifies toxic pesticides. A developing country can use this classification in its risk evaluation, without conducting its own studies. That part of the risk evaluation equation was often easier for the members to assess.

Exposure was more difficult to determine. A country has to show that there was exposure, or it expected that exposure could happen. For example, a country can use "bridging information" that explains the ban or restriction was informed by the risks experienced by other countries that use the pesticide on the same crops or in similar climatic circumstances. It would be reasonable, therefore, to ban the pesticide before it harmed farmers.

Members were left sifting through supporting information to find evidence of exposure or even some indication that exposure had likely occurred. Most of the notifications from Mozambique were ultimately set aside because the supporting documentation did not provide such hints of exposure. For methidathion and thiodicarb, there was no evidence that Mozambique had imported the pesticides. It was difficult to conclude they were used and, in turn, that farmers were exposed to them. Farmers might cross borders to buy pesticides that are available and affordable. This import would not be captured in national data. While members appreciated these challenges, they ultimately concluded that there had to be some indication that the pesticide was used in country. Two notifications from Mozambique remain, including fenamiphos, which also appears to lack documentation indicating that it was imported into the country.

Evidence of exposure also complicated discussions on the notifications from Malaysia. These too were set aside and loom as a "long debate," as one member put it, for the next CRC meeting. These notifications explain that the pesticides were banned because the maximum residue limits (MRLs) were exceeded, which, for a few members, fulfills the exposure part of the risk evaluation equation. MRLs are a monitoring tool used to enforce regulatory standards. Exceedances indicate that farmers are not following good agricultural practices. For many observers and members, even an exceeded MRL would not expose people to enough of a pesticide to pose a risk to their health.

CRC members drew distinctions between MRLs. They dismissed default MRLs because they are used when no MRL has been set for a particular pesticide. Because these levels are so low, members agreed they should not really be used to indicate exposure occurred. But Codex MRLs are set by the FAO's Codex Committee on Pesticide Residues. That Committee considers the toxicity of the pesticide when setting the MRL. Some members were willing to view exceedances of these MRLs as indicating consumers were exposed to a pesticide. These technical deep-dives involve piecing together information from countries that often lack human and technical capacity, or took action themselves based on incomplete information.

Malaysia took preventative measures, using MRL values as a proxy for risk. Like Mozambique's notifications, many conceded that the domestic actions were appropriate, given Malaysia's concerns and the information available. The question is whether the national level processes can lead to global action that would give all countries to gain information about the pesticides, but also prompt national regulators to provide their prior informed consent. Observers were also acutely aware that global action would also identify the pesticide as an HHP.

The question of whether domestic experiences should trigger a global response was the focus when the Committee assessed the proposals for severely hazardous pesticide formulations (SHPFs). Here, the criteria are equally vague. One of the Convention's criteria is that the health and environmental effects reports are "significant concerning the quantity of the formulation used." For members, the skin irritations and headaches reported did not meet this bar. For some observers, significant is not the same as severe, with one suggesting that socioeconomic effects like lost productivity could be considered.

Past reviews of these proposals from the Lao People's Democratic Republic (PDR) were more open to a broader interpretation of significant, but at this meeting members preferred a more focused interpretation. In part, the change was prompted by a lack of information. Despite a request, Lao PDR confirmed no additional information was available. Members also had a new compilation of previous SHPF reviews to refer to. In comparison to the significance of those incidents, the ones from Lao PDR did not seem to match up. The CRC set aside all of the proposals under review. For them, the experiences of a small number of farmers, without evidence of how they obtained the pesticides or how much they applied, fell short of the threshold for global action.

Moving in the Right Direction?

CRC-21 had 18 pesticides under review, and more than half were carried over from previous CRC meetings. Many were set aside. Members only deferred Mozambique's notification of carbaryl, the four pesticides notified by Malaysia, and the new fenamiphos notification from Mozambique. Previous CRC meetings had asked for more information on these notifications. But still members found that more information was not necessarily the right information.

The CRC showed itself more willing to set aside notifications after protracted reviews and (sometimes failed) requests for additional information. For some, this showed that the Committee is building consistency in its approach to interpreting the Convention. But others still stressed the case-by-case approach because, in the spirit of the Convention, overstretched national regulators may not always have the right information at hand.

For pesticides, the CRC's work will remain under a microscope as global action on HHPs ramps up. CRC reviews do not just prompt information exchange during trade, but if the political decisions at the COP agree with the CRC, then the pesticides could be part of global efforts to ban HHPs. The struggles to consider developing countries' challenges in CRC reviews, and to consider if there is sufficient information to warrant global action will continue to be difficult to balance.

Upcoming Meetings

POPRC-21: The Stockholm Convention's Persistent Organic Pollutants Review Committee (POPRC) will consider the draft risk profile to list polyhalogenated dibenzo-p-dioxins and dibenzofurans

(PXDD/PXDF) in Annex C to the Convention. Among other issues, it will review information related to stockpiles, products, and articles in use and wastes. **dates:** 29 September - 3 October 2025 **location:** Rome, Italy **www:** pops.int

Montreal Protocol MOP 37: The 37th Meeting of the Parties to the Montreal Protocol on Substances that Deplete the Ozone Layer will discuss issues related to implementation, monitoring, and the phase-out of ozone-depleting chemicals and relevant greenhouse gases. **dates:** 3-7 November 2025 **location:** Nairobi, Kenya **www:** ozone.unep.org

Minamata Convention on Mercury COP-6: The 6th meeting of the Conference of the Parties to the Minamata Convention on Mercury will meet to address issues such as trade control, waste management, and mercury use in cosmetics, dental fillings, artisanal and small-scale gold mining, and industrial processes. **dates:** 3-7 November 2025 **location:** Geneva, Switzerland **www:** minamataconvention.org

Annual General Meeting (AGM) of the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF): The 21st AGM of the IGF will meet with the theme: Value Beyond Extraction: Rethinking Mining for a Resilient Future. **dates:** 3-5 November 2025 **location:** Geneva, Switzerland **www:** igfmining.org/annual-general-meeting

Open-ended Committee of Permanent Representatives (OECPR 7): OECPR 7 will convene to prepare potential resolutions ahead of the seventh session of the UN Environment Assembly (UNEA-7). **dates:** 1-5 December 2025 **location:** Nairobi, Kenya **www:** unep.org/environmentassembly/unea7/oecpr7

UNEA 7: The United Nations Environment Assembly (UNEA) is the highest decision-making body on environmental matters under the UN. It will meet under the theme Advancing Sustainable Solutions for a Resilient Planet. **dates:** 8-12 December 2025 **location:** Nairobi, Kenya **www:** unep.org/environmentassembly

CRC-22: The CRC will review notifications from Mozambique and Malaysia deferred by CRC-21, and other notifications. **dates:** 29 September - 2 October 2026 **location:** Rome, Italy. **www:** pic.int

Basel Convention COP18, Rotterdam Convention COP13, and Stockholm Convention COP13: 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:** 19-30 April 2027 (tentative) **location:** Panama City, Panama (tentative) **www:** brsmeas.org

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

Glossary

CRC	Chemical Review Committee
COP	Conference of the Parties
DGD	Decision Guidance Document
EFSA	European Food Safety Authority
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
PIC	Prior informed consent
SHPF	Severely hazardous pesticide formulation
WHO	World Health Organization