CRC-11/4: Carbosulfan

*The Chemical Review Committee,*

*Recalling* Article 5 of the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade,

1. *Concludes* that the notifications of final regulatory action for carbosulfan submitted by the European Union and by Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo meet the criteria set out in Annex II to the Convention;

2. *Adopts* the rationale for the Committee’s conclusion set out in the annex to the present decision;

4. *Recommends,* in accordance with paragraph 6 of Article 5 of the Convention, that the Conference of the Parties should list carbosulfan in Annex III to the Convention as a pesticide;

5. *Decides,* in accordance with paragraph 1 of Article 7 of the Convention, to prepare a draft decision guidance document for carbosulfan;

6. *Also decides*, in accordance with the process for drafting decision guidance documents set out in decision RC-2/2, that the composition of the intersessional drafting group to prepare the draft decision guidance document for carbosulfan and the workplan of the group shall be as set out in annexes II and III to the report of the Committee’s eleventh meeting, respectively.

Annex to decision CRC-11/4

Rationale for the conclusion by the Chemical Review Committee that the notifications of final regulatory action submitted by the European Union, Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo in respect of carbosulfan meet the criteria of Annex II to the Rotterdam Convention

1. In reviewing the notifications of final regulatory action by the European Union, Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo to ban carbosulfan as a pesticide, together with the supporting documentation provided by those parties, the Committee was able to confirm that the final regulatory actions had been taken to protect human health and the environment. The notifications from those parties were found to meet the information requirements of Annex I to the Rotterdam Convention.
2. The notifications and supporting documentation were made available to the Committee for its consideration in documents UNEP/FAO/RC/CRC.11/4, UNEP/FAO/RC/CRC.11/7, UNEP/FAO/RC/CRC.11/INF/5, UNEP/FAO/RC/CRC.11/INF/14 and UNEP/FAO/RC/CRC.11/INF/15.
3. **European Union**
4. **Scope of the notified regulatory action**
5. The regulatory action notified by the European Union relates to the use of carbosulfan as a pesticide. The marketing or use of carbosulfan is banned by the final regulatory action, which states that it is prohibited to place on the market or use plant protection products containing carbosulfan and that the substance is not included in the list of approved active ingredients under Regulation (EC) No. 1107/2009, which replaces Council Directive 91/414/EEC. The authorizations for plant protection products containing carbosulfan had to be withdrawn by 13 December 2007. As of 16 June 2007 no authorizations for plant protection products containing carbosulfan were allowed to be granted or renewed by the member States and all uses of plant protection products containing carbosulfan were prohibited as from 13 December 2008 (UNEP/FAO/RC/CRC.11/7, section 2.2.1 of the European Union notification).
6. Entry into force of all provisions of Commission Decision 2007/415/EC of 13 June 2007 pertaining to the non-inclusion of carbosulfan in Annex I to Council Directive 91/414/EEC and the withdrawal of authorizations for plant protection products containing that substance occurred on 13 December 2008, since all uses of plant protection products containing carbosulfan were prohibited as from that date at the latest (UNEP/FAO/RC/CRC/11/7, section 2.2.3 of the European Union notification).
7. The notification was found to comply with the information requirements of Annex I.
8. **Annex II paragraph (a) criterion**

*(a) Confirm that the final regulatory action has been taken in order to protect human health or the environment;*

1. The Committee confirms that the regulatory action was taken to protect human health and the environment (UNEP/FAO/RC/CRC.11/7, section 2.4.2 of the European Union notification).
2. Carbosulfan was used in the European Union as a systemic insecticide. It was used for incorporation into soil (at drilling) at sites where maize and sugar beets were grown, as well as on citrus and cotton. The substance can be used as insecticide and nematicide (UNEP/FAO/RC/CRC.11/7, section 2.3.1 of the European Union notification).
3. The risk evaluation concluded that carbosulfan was not shown to meet the safety requirements of Article 5 (1) (a) and (b) of Directive 91/414/EEC. Certain metabolites with hazardous profiles (some of which are potentially genotoxic) result from the use of carbosulfan, which leads to concerns about the exposure of consumers and the possible risk of groundwater contamination. In addition, impurities, of which at least one is carcinogenic (N-nitrosodibutylamine), have been found in the active substance as sold on the market (technical material) at levels raising concerns. The presence of unknown carcinogenic impurities in the technical substance may increase during storage, but the data submitted by the notifiers were not sufficient to address this concern and adequately assess the related risks for operators.
4. A further review in 2009 noted that intake by toddlers might exceed the acceptable daily intake and that consumption of a number of crops might pose an acute risk to children and adults. The risk evaluation raised concerns regarding a possible risk to groundwater due to potential contamination by the parent substance and a number of relevant metabolites. Concerns remained regarding the risk for birds and mammals, aquatic organisms, bees and earthworms (UNEP/FAO/RC/CRC.11/7, section 2.4.2 of the European Union notification; UNEP/FAO/RC/CRC/11/INF/14). The results of this second review from 2009, however, have not resulted in another regulatory action (see introduction to chapter 2.3).
5. The notification describes that the final regulatory action prohibits all uses of carbosulfan as a plant protection product; this is expected to lead to a significant decrease in the quantity of the chemical used, resulting in a significant reduction of risk to human health and the environment.
6. Therefore the Committee confirms that the criterion in paragraph (a) is met.
7. **Annex II paragraph (b) criteria**

*(b) Establish that the final regulatory action has been taken as a consequence of a risk evaluation. This evaluation shall be based on a review of scientific data in the context of the conditions prevailing in the Party in question. For this purpose, the documentation provided shall demonstrate that:*

*(i) Data have been generated according to scientifically recognized methods;*

*(ii) Data reviews have been performed and documented according to generally recognized scientific principles and procedures;*

1. Prior to the regulatory action, a risk assessment was carried out on the basis of Directive 91/414/EEC, replaced by Regulation (EC) 1107/2009, which provided for the European Commission to issue a work programme for the examination of existing active substances used in plant protection products with a view to their possible inclusion in Annex I to the Directive in accordance with the provisions of Article 8 (7) of Regulation (EC) No 451/2000.
2. A member State (Belgium) was designated to undertake the risk assessment based on the information submitted by the notifiers and to establish a draft assessment report, which was subject to peer review organized by the European Food Safety Authority (EFSA). The conclusions provided by EFSA were reviewed by the member States and the Commission and submitted to the Standing Committee on the Food Chain and Animal Health.
3. The evaluation of carbosulfan was based on a review of scientific data taking into account the conditions prevailing in the European Union, including intended uses, recommended application rates and good agricultural practices. Only data generated according to scientifically recognized methods were validated and used for the evaluation. Moreover, data reviews were performed and documented according to generally recognized scientific principles and procedures (UNEP/FAO/RC/CRC/11/7, section 2.4.1 of the European Union notification).
4. The conclusions on the effects of carbosulfan on human health and the environment were reached on the basis of the evaluation of representative uses of carbosulfan as an insecticide as proposed by the applicant, including incorporation into soil (at drilling) to control soil insects where maize and sugar beets were grown. Sufficient analytical methods as well as methods and data relating to physical, chemical and technical properties are available to ensure that at least limited quality control measurements of the plant protection product are possible. Analytical methods for the data provided are summarized in the supporting documentation from the European Union. Data includes toxicity endpoints, no observed adverse effect levels, acceptable daily intake, acceptable operator exposure levels and determinations and comparisons to expected exposure of humans and various organisms (UNEP/FAO/RC/CRC/11/INF/14).
5. Thus, the Committee established that the data reviewed for the risk evaluation were generated according to scientifically recognized methods and that the data reviews were performed according to generally recognized scientific principles and procedures.
6. Consequently, the Committee confirms that the criteria in subparagraphs (b) (i) and (b) (ii) are met.

*(iii) The final regulatory action was based on a risk evaluation involving prevailing conditions within the Party taking the action;*

1. The final regulatory action to ban carbosulfan was based on a risk evaluation, in which the proposed conditions of use within the European Union, including intended uses, recommended application rates and good agricultural practices, were taken into account. The risk analysis considered the representative insecticide uses as proposed by the applicant for incorporation into soil (at drilling) to control soil insects, where maize and sugar beets would be grown. The conclusions of EFSA were reached on the basis of the evaluation of the representative uses in the European Union.
2. Assessments made on the basis of the data on carbosulfan submitted by the applicant did not demonstrate that it might be expected that, under the proposed conditions of use, plant protection products containing carbosulfan would satisfy in general the requirements laid down in Article 5 (1) (a) and (b) of Directive 91/414/EEC. In particular, concerns were identified with regard to:
3. The toxicity of the substance and the presence of unknown levels of carcinogenic impurities in the technical substance, which might increase during storage;
4. Worker exposure, which remains inconclusive due to uncertainties regarding the presence of the above impurities;
5. Consumer exposure, which remains inconclusive due to uncertainties regarding the effects of certain metabolites, some of which could be genotoxic;
6. Possible contamination of groundwater by the parent substance and by a number of relevant metabolites;
7. A substantial lack of data for almost all groups with regard to ecotoxicology (UNEP/FAO/RC/CRC/11/INF/14, p. 91), including in particular for birds, mammals, aquatic organisms and bees (except in sugar beets), for which a first tier high risk was identified (UNEP/FAO/RC/CRC/11/INF/14, p. 49).
8. Consequently, the Committee confirms that the criterion in subparagraph (b) iii) is met.
9. The Committee confirms that the criteria in paragraph (b) are met.
10. **Annex II paragraph (c) criteria**

*(c) Consider whether the final regulatory action provides a sufficiently broad basis to merit listing of the chemical in Annex III, by taking into account*:

*(i) Whether the final regulatory action led, or would be expected to lead, to a significant decrease in the quantity of the chemical used or the number of its uses;*

1. The final regulatory action prohibits all uses of carbosulfan as a plant protection product (UNEP/FAO/RC/CRC.11/7, section 2.3.3 of the European Union notification).
2. The estimated quantity of carbosulfan produced, imported, exported and used in the European Union prior to the regulatory action was not provided. Nevertheless, since the regulatory action prohibits the use of carbosulfan, it is expected that the use of carbosulfan as a plant protection product within the European Union will be reduced to zero.
3. Therefore the Committee confirms that the criterion in subparagraph (c) (i) is met.

*(ii) Whether the final regulatory action led to an actual reduction of risk or would be expected to result in a significant reduction of risk for human health or the environment of the Party that submitted the notification;*

1. It is expected that since the regulatory action prohibits the use of carbosulfan the risks to the environment and to human health will be significantly reduced.
2. Therefore, the Committee confirms that the criterion in subparagraph (c) (ii) is met.

*(iii) Whether the considerations that led to the final regulatory action being taken are applicable only in a limited geographical area or in other limited circumstances;*

1. The concerns expressed regarding the acute exposure of vulnerable groups of consumers, risk of groundwater contamination and risks for birds, mammals, aquatic organisms, bees and earthworms, as determined by use patterns and modelled behaviour, could be encountered in other countries with similar climatic conditions using carbosulfan (UNEP/FAO/RC/CRC/11/7, sections 2.4.2. and 2.5.2 of the European Union notification).
2. Therefore the Committee confirms that the criterion in subparagraph (c) (iv) is met.

*(iv) Whether there is evidence of ongoing international trade in the chemical;*

1. The notification from the European Union provides no information on the estimated quantity of carbosulfan produced, imported, exported and used. The information gathered by the Secretariat (UNEP/FAO/RC/CRC.11/INF/5), however, indicates that carbosulfan was exported from the European Union to two countries in 2012 and 2013. In the same document, CropLife International confirms that there is ongoing international trade of carbosulfan.
2. Therefore the Committee confirms that the criterion in subparagraph (c) (iv) is met
3. **Annex II paragraph (d) criterion**

*(d) Take into account that intentional misuse is not in itself an adequate reason to list a chemical in Annex III.*

1. There is no indication in the notification or supporting documentation that concerns for intentional misuse of carbosulfan prompted the regulatory action.
2. Based on the above point the Committee confirms that the criterion in subparagraph (d) is met.
3. **Conclusion**
4. Therefore, the Committee concludes that the notification of final regulatory action by the European Union meets all the criteria set out in Annex II to the Convention.
5. **Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo**
6. **Scope of the notified regulatory action**
7. The regulatory action notified by Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo (hereafter referred to as the CILSS countries), relates to the use of carbosulfan as a pesticide. All uses of carbosulfan-based pesticides were prohibited effective 8 April 2015. The final regulatory action states that all products containing carbosulfan were banned due to its extremely high toxic potential to human health and especially the environment (UNEP/FAO/RC/CRC.11/7, section 2.2.1 of the CILSS notifications).
8. The notification was found to comply with the information requirements of Annex I.
9. **Annex II paragraph (a) criterion**

*(a) Confirm that the final regulatory action has been taken in order to protect human health or the environment;*

1. The Committee confirms that the regulatory action was taken to protect human health and the environment (UNEP/FAO/RC/CRC.11/7, section 2.4.2 of the CILSS notifications).
2. Four carbosulfan-based formulations were granted temporary sales authorization in 1996. Two other formulations have been under review since 2005. However, no carbosulfan-based formulation has been registered by the Sahelian Pesticides Committee since 2006 (SPC) (SPC, 2011; Toe, 2007). The Sahelian Pesticides Committee stopped the registration of carbosulfan-based pesticides in 2006 taking into account the following reasons (UNEP/FAO/RC/CRC/11/INF/15, page 15):
3. The fragile ecology of CILSS countries, already characterized by an imbalance of ecosystems and the disappearance of organisms useful to the environment;
4. Non-compliance with recommended measures for the safe use of carbosulfan by users in CILSS countries;
5. The low rate of utilization of protective equipment by growers;
6. The existence of alternatives to the use of carbosulfan.
7. In April 2015, on the recommendation of the Sahelian Pesticides Committee, carbosulfan was banned by decision of the CILSS Coordinating Minister (Minister of Agriculture and Environment) due to unacceptable risk to human health (arising from difficulty in handling carbosulfan by users in Sahelian countries without unacceptable risk) and non-target organisms in the environment. The ban of carbosulfan in several other countries such as the States of the European Union is also mentioned (UNEP/FAO/RC/CRC/11/INF/15, page 15).
8. In the notifications, the following hazards to human health are reported: carbosulfan belongs to WHO Class II (moderately hazardous) (Footprint, 2011; WHO, 2008); it is a cholinesterase inhibitor (FAO, 003) (UNEP/FAO/RC/CRC/11/INF/15, page 15). Furthermore, the notification states that during a pilot study carried out in Burkina Faso in June 2010, through both retrospective and prospective surveys, one carbosulfan-based formulation was involved in a poisoning case: PROCOT 40 WS, a tertiary formulation containing carbosulfan (250 g/kg), carbendazim (100 g/kg) and metalaxyl-M (50 g/kg) (UNEP/FAO/RC/CRC/11/7, section 2.4.2.1 of the CILSS notifications, UNEP/FAO/RC/CRC/11/INF/15).
9. In the notifications, the following hazards to the environment are reported: carbosulfan is highly toxic to birds (LD50 *Anas platyrhynchos* = 10 mg/kg), fish (LC50 96h *Lepomis macrochirus* = 0.015 mg/L), aquatic invertebrates (EC50 48h *Daphnia magna* = 0.0032 mg/L) and bees (LD50 48h = 0.18 μg/bee) (Footprint PPDB, 2014) (UNEP/FAO/RC/CRC/11/7, section 2.4.2.2 of the CILSS notifications).
10. The notifications state that carbosulfan is banned by the final regulatory action; this is expected to lead to a significant decrease in the quantity of the chemical used, resulting in significant reduction of risk to human health and the environment.
11. Therefore, the Committee confirms that the criterion in paragraph (a) is met.
12. **Annex II paragraph (b) criteria**

*(b) Establish that the final regulatory action has been taken as a consequence of a risk evaluation. This evaluation shall be based on a review of scientific data in the context of the conditions prevailing in the Party in question. For this purpose, the documentation provided shall demonstrate that:*

*(i) Data have been generated according to scientifically recognized methods;*

(*ii) Data reviews have been performed and documented according to generally recognized scientific principles and procedures;*

1. The risk evaluation is based on scientific data from several internationally recognized sources (the Food and Agriculture Organization of the United Nations, the World Health Organization, Pesticide Action Network, Pesticide Properties Database) and reports from the Sahelian Pesticides Committee, the United States Environmental Protection Agency (for carbofuran), the European Commission, the Australian Pesticides and Veterinary Medicines Authority and the National Institute of Industrial Environment and Risk (L’Institut National de l’Environnement Industriel at des Risques) (UNEP/FAO/RC/CRC.11/INF/15, pages 17-18, 110-134). The notifications from the CILSS countries took into account scientific information from these sources.
2. The Committee concludes that the data in the above sources were generated according to scientifically recognized methods and that data reviews were performed and documented according to generally recognized scientific principles and procedures.
3. Consequently, the Committee confirms that the criteria in subparagraphs (b) (i) and (b) (ii) are met.

*(iii) The final regulatory action was based on a risk evaluation involving prevailing conditions within the Party taking the action;*

1. The final regulatory action to ban carbosulfan was based on a risk evaluation. The risk to human health and non-target organisms, as well as the risk of contamination of groundwater, makes it very difficult to handle carbosulfan safely in Sahel countries. The decision takes into account information from a pilot study on agricultural pesticide poisoning in Burkina Faso. The full report on this pilot study is included in the supporting documentation (UNEP/FAO/RC/CRC.11/INF/15, page 19). Burkina Faso is in the same geographical region as the rest of the notifying Parties. The notifications cited the following risks to human health and the environment: cases of poisoning due to the use of a carbosulfan-based pesticide formulation; the fragile ecology of CILSS countries, already characterized by an imbalance of ecosystems and disappearance of organisms useful to the environment; non-compliance with recommended measures for the safe use of carbosulfan, including the low rate of utilization of protective equipment by growers (UNEP/FAO/RC/CRC/11/INF/15, page 17).
2. The annex to the decision to ban carbosulfan further specifies the risks to human health and the environment in the notifying Parties. These risks result from the use of pesticides and the use of pesticides containing carbosulfan specifically. Growers do not follow good agricultural practices, in particular regarding the use of appropriate personal protective equipment. Protective equipment (dust masks, boots and gloves in particular) is sold to growers by distributors in 20 per cent of cases. The equipment is not specifically designed for field treatments. During plant treatment, growers mainly wear dust masks (39.08 per cent of cases) and boots (28.8 per cent of cases), whereas overalls are the least used (4.5 per cent of cases).
3. More than half of growers (67.5 per cent) had a water source in their fields or nearby. The majority of water points were less than 100 metres from fields, and that proximity may result in water pollution by pesticides. Water was drunk in 50 per cent of cases, was used for the preparation or dilution of pesticides in 29.26 per cent of cases and was used for watering animals 26.96 per cent of cases (UNEP/FAO/RC/CRC/11/INF/15, page 16).
4. Consequently, the Committee confirms that the criterion in subparagraph (b) (iii) is met.
5. Therefore, the Committee confirms that the criteria in paragraph (b) are met.
6. **Annex II paragraph (c) criteria**

*(c) Consider whether the final regulatory action provides a sufficiently broad basis to merit listing of the chemical in Annex III, by taking into account:*

*(i) Whether the final regulatory action led, or would be expected to lead, to a significant decrease in the quantity of the chemical used or the number of its uses;*

1. The use of carbosulfan is banned by the final regulatory action, which entered into force on 8 April 2015. The final regulatory action states that all plant protection products (insecticide-nematicide) containing carbosulfan are banned due to its highly toxic potential for human health and mainly the environment (UNEP/FAO/RC/CRC.11/5, section 2.2.1).
2. The final regulatory action is therefore expected to lead to a significant decrease in the quantity of the chemical used, resulting in a significant reduction of the risk to human health and the environment.
3. Therefore the Committee confirms that the criterion in subparagraph (c) (i) is met.

*(ii) Whether the final regulatory action led to an actual reduction of risk or would be expected to result in a significant reduction of risk for human health or the environment of the Party that submitted the notification;*

1. It is expected that since the regulatory action bans the use of carbosulfan the risks to the environment and to human health will be significantly reduced.
2. Therefore the Committee confirms that the criterion in subparagraph (c) (ii) is met.

*(iii) Whether the considerations that led to the final regulatory action being taken are applicable only in a limited geographical area or in other limited circumstances;*

1. The notifications state that the final regulatory action will be of great interest to other Sahel countries using the product under the same conditions (UNEP/FAO/RC/CRC.11/7, section 2.5.2).
2. The Committee concluded that the considerations that led to the final regulatory action being taken are applicable to a wide geographical area and a broad range of circumstances.
3. Therefore the Committee confirms that the criterion in subparagraph (c) (iii) is met.

*(iv) Whether there is evidence of ongoing international trade in the chemical;*

1. The notifications give no information on the estimated quantity of carbosulfan produced, imported, exported and used. The information gathered by the Secretariat (UNEP/FAO/RC/CRC.11/INF/5), however, indicates that carbosulfan was exported from the European Union to two countries in 2012 and 2013. In the same document, CropLife International confirms that there is ongoing international trade of carbosulfan.
2. Therefore the Committee confirms that the criterion in subparagraph (c) (iv) is met.
3. **Annex II paragraph (d) criterion**

*(d) Take into account that intentional misuse is not in itself an adequate reason to list a chemical in Annex III.*

1. There is no indication in the notification that concerns for intentional misuse prompted the regulatory action.
2. Based on the above point the Committee confirms that the criterion in paragraph (d) is met.
3. **Conclusion**
4. The Committee concludes that the notifications of final regulatory action by Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo meet the criteria set out in Annex II to the Convention.

III. Conclusion

1. The Committee concludes that the notifications of final regulatory action by the European Union, Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo meet the criteria set out in Annex II to the Convention. The Committee also concludes that the final regulatory actions taken by the European Union, Burkina Faso, Cabo Verde, Chad, the Gambia, Mauritania, Niger, Senegal and Togo provides a sufficient basis to merit including carbosulfan in Annex III to the Convention in the pesticide category and that a decision guidance document should be drafted on the basis of the notifications.

Annex II

Composition of intersessional drafting groups (2015–2016)

Drafting group on carbofuran

Chair: Mr. Jack Holland (Australia)

Vice-Chair: Ms. Leonarda Christina van Leeuwen (Netherlands)

Members: Mr. Malverne Spencer (Antigua and Barbuda)

Mr. Gilberto Fillman (Brazil)

Ms. Parvoleta Angelova Luleva (Bulgaria)

Mr. Peter Ayuk Enoh (Cameroon)

Mr. Jeffery R. Goodman (Canada)

Ms. Jinye Sun (China)

Mr. Omar S. Bah (The Gambia)

Ms. Mirijam Seng (Germany)

Mr. Ram Niwas Jindal (India)

Mr. Mohd Fauzan Yunus (Malaysia)

Ms. Magdalena Frydrych (Poland)

Mr. Jung-Kwan Seo (Republic of Korea)

Mr. Jürgen Helbig (Spain)

Ms. Sarah Maillefer (Switzerland)

Ms. Nuansri Tayaputch (Thailand)

Mr. N'Ladon Nadjo (Togo)

Drafting group on carbosulfan

Chair: Mr. Jeffery R. Goodman (Canada)

Vice-Chair: Ms. Parvoleta Angelova Luleva (Bulgaria)

Members: Mr. Jack Holland (Australia)

Ms. Jinye Sun (China)

Ms. Elsa Ferreras (Dominican Republic)

Mr. Omar S. Bah (The Gambia)

Ms. Mirijam Seng (Germany)

Ms. Ana Gabriela Ramírez Salgado (Honduras)

Mr. Ram Niwas Jindal (India)

Mr. Mohd Fauzan Yunus (Malaysia)

Mr. Gaoussou Kanouté (Mali)

Ms. Amal Lemsioui (Morocco)

Ms. Magdalena Frydrych (Poland)

Mr. Jung-Kwan Seo (Republic of Korea)

Ms. Tatiana Tugui (Republic of Moldova)

Mr. Jürgen Helbig (Spain)

Ms. Sarah Maillefer (Switzerland)

Ms. Nuansri Tayaputch (Thailand)

Mr. N'Ladon Nadjo (Togo)

Annex III

Workplan for the preparation of draft decision guidance documents

| **Tasks to be carried out** | **Responsible persons** | **Deadlines** |
| --- | --- | --- |
| Draft an internal proposal based on the information available to the Committee | Chair  Vice-Chair | 15 December 2015 |
| Send the draft internal proposal to the drafting group members for comments via e-mail | Chair  Vice-Chair | 15 December 2015 |
| Replies | Drafting group members | 20 January 2016 |
| Update the internal proposal based on comments from drafting group members | Chair  Vice -Chair | 20 February 2016 |
| Send the updated internal proposal to the Committee members and observers for comments via e-mail | Chair  Vice -Chair | 20 February 2016 |
| Replies | Committee members and observers | 31 March 2016 |
| Draft a decision guidance document based on the comments of the Committee members and observers | Chair  Vice -Chair | 28 April 2016 |
| Send the draft decision guidance document to the drafting group members for comments via e-mail | Chair  Vice -Chair | 28 April 2016 |
| Replies | Drafting group members | 9 May 2016 |
| Finalize the draft decision guidance document based on the comments of the drafting group members | Chair  Vice -Chair | 30 May 2016 |
| Send the draft decision guidance document to the Secretariat | Chair  Vice-Chair | 30 May 2016 |
| Present the draft decision guidance document to the Committee at its twelfth meeting |  | September 2016 |

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