Environment Canada Environnement Canada

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Martin Williams, Chair to the Executive Body for the Convention on Long-range Transboundary Air Pollution (LRTAP)
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Re: Submission of additional information on Trifluralin under the Protocol on Persistent Organic Pollutants.

Dear Martin,

In response to the Executive Body's request of December 2010, Canada is pleased to submit the following additional new scientific information, in advance of the 49th session of the Working Group on Strategies and Review, on Trifluralin as it relates to significant adverse human health impacts and environmental effects as a result of long-range transport.

Canada has raised concerns that trifluralin does not meet all the criteria as a POP, specifically the 2b criteria, based on additional scientific information considered during Canada's re-evaluation.

In December 2009, Canada submitted additional information on trifluralin to the LRTAP for consideration. At the 27th Session of the Executive Body in December 2009, consensus was reached to continue evaluation of trifluralin based on the additional information submitted by Canada.

Reviewers for the peer review process were nominated and approved by all Parties prior to initiating the review in March 2010.

The three reviewers concluded that trifluralin meets the LRTAP criteria for potential for long-range transport, toxicity, persistence and bioaccumulation.

All reviewers agreed that the data on environmental concentrations in remote regions are limited. To a large extent the limited data was a key factor in the peer reviewer conclusions.

There were conflicting views between the peer reviewers about whether sufficient information exists to suggest that the substance is likely to have significant adverse human health and/or environmental effects as a result of its long range atmospheric transport (criteria 2b under Executive Body Decision 1998/2 ).

Two of the reviewers determined that there was insufficient evidence to be able to make a conclusion, one of these voiced an opinion that based on current data for environmental concentrations the substance did not meet criteria under 2b.

A third reviewer stated that they could not conclude that there would not be adverse effects based on the lack of data.

The additional information and the recommendation of the peer reviewers were considered by the Task Force in May 2010. No consensus was reached on the 2b criteria by the Task Force on POPs.

Canada would like to note that through this submission, it is providing further information and additional references showing where trifluralin was included as an analyte in monitoring studies in various media including biota, but was below detection limits and therefore not reported.

Most of the information gathered for this purpose has only recently been published or was only recently reviewed. Previously published additional information has also been provided for areas of use, where the potential for trifluralin exposure to biota and in abiotic compartments is much greater. The latter information was not provided in Canada's previous submission in December 2009 as the focus generally related to this protocol is on remote areas. Consequently, we believe that this information is relevant as it shows consistency with results from remote areas.

Please do not hesitate to contact me if you need any clarification.

Sincerely,

Vincenza Galatone

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c.c.: Richard Ballaman, Chair, Working Group on Strategies and Review
c.c.: Albena Karadjova, Secretary, Convention on Long-range Transboundary Air Pollution