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DEPARTMENT OF FORESTRY, FISHERIES AND THE ENVIRONMENT

NO. 5604 **29 November 2024**

REQUEST FOR INFORMATION ON CHEMICALS RECOMMENDED TO BE LISTED AT THE 12TH CONFERENCE OF THE PARTIES (COP 12) TO THE STOCKHOLM AND ROTTERDAM CONVENTIONS

The Department of Forestry, Fisheries and the Environment, hereby requests information on chemicals to be recommended for listing at the 12th Conference of the Parties (COP 12) under the Stockholm and Rotterdam Conventions to be held from 28 April - 09 May 2025 in Geneva, Switzerland. Any person in South Africa who manufactures, uses, sells, imports, exports, or is in possession of chemicals indicated in the Schedule hereto, is hereby requested to submit all the information as per the Schedule, to the Department of Forestry, Fisheries and the Environment within the 30 days from the date of publication of this Notice in the Government *Gazette*, or in a national newspaper, whichever date comes last. Written submissions of the requested information must be forwarded to any of the following addresses:

By post to: The Director-General
Department of Forestry, Fisheries and the Environment
Attention: Ms Noluzuko Gwayi: International Chemicals and Waste Cooperation
Private Bag X447
PRETORIA
0001

By hand at: Environment House, 473 Steve Biko Road, Arcadia, 0083, attention to Mr Gordon Khauoe

By email: gkhauoe@dffe.gov.za

Any enquiries in connection with this Notice can be directed to Ms Noluzuko Gwayi, Senior Policy Advisor (Director): International Chemicals and Waste Cooperation at ngwayi@dffe.gov.za or (012) 399 9854

NOMFUNDO TSHABALALA
DIRECTOR-GENERAL OF FORESTRY, FISHERIES AND THE ENVIRONMENT

SCHEDULE

1. BACKGROUND

The legal mandate and core business of the Department of Forestry, Fisheries and the Environment (the Department) is to manage, protect and conserve South Africa's environment and natural resources. The mandate is informed by section 24 of the Constitution of the Republic of South Africa, 1996, which affords everyone the right to (a) an environment that is not harmful to their health or well-being; and (b) to have the environment protected for the benefit of present and future generations, through reasonable legislative and other measures.

To give effect to this constitutional environmental right and the need for sound environmental management and sustainable development, the Department has over a period developed a comprehensive environmental management legislative/regulatory framework and ratified various chemicals and waste international treaties which are in line with South African environmental legislation and foreign policy. In light of this, the Department hereby affords the chemicals industry, interested and affected parties, an opportunity to provide information with regards to the chemicals indicated in tables 1 & 2 that will be recommended to be listed under the Stockholm and Rotterdam Conventions, respectively, during the upcoming Conference of the Parties (COP 12) to be held from 28 April to 9 May 2025 in Geneva, Switzerland. The Stockholm, and Rotterdam Conventions are global Treaties and their respective primary objective is to protect the environment and human health from adverse effects of the listed hazardous chemicals.

The Department hereby requests the following information:

1. Whether the chemicals in tables 1 & 2 are being used in South Africa, and if so, for what applications are they used?
2. Whether the chemicals in tables 1 & 2 are being manufactured and sold in South Africa?
3. Whether the chemicals in tables 1 & 2 are being imported or exported by South African individuals or companies? If so, full details of imports or exports need to be provided within the 30-day period after the publication of this gazette.
4. Whether there are persons or companies in South Africa that are in possession of chemicals and waste containing chemicals listed in tables 1 & 2?
5. Whether safer alternatives to the chemicals recommended for listing have been or are being piloted in South Africa for use in the various applications?
6. If there are any valid reasons for not supporting the listing of the recommended chemicals? Valid empirical data is needed in this regard as evidence of not supporting the listing of the recommended chemicals.
7. If there are reasons; supporting valid data and reasons should be provided within the 30-day period after the publication of this Notice.
8. What would the possible impact be, should the chemicals recommended be listed? Such an impact, if there would be any, should be valid, and rationalised in light of using available safer alternatives.

The information requested above, will assist South Africa to augment information on the positions developed in preparation for the upcoming multilateral negotiations, to be held during the Conference of the Parties (COPs) from 28 April to 9 May 2025 in Geneva, Switzerland, and in line with protecting national interests and observing South Africa's foreign policy. Furthermore, the information provided will assist South Africa to manage in an environmentally sound manner throughout their life cycle, the chemicals that have been recommended for listing and their possible resultant waste, by utilising various instruments. All the chemicals recommended for listing have been shown to cause harm to the environment or to human health.

2. CHEMICALS RECOMMENDED FOR LISTING UNDER THE STOCKHOLM CONVENTION

The listing of chemicals in Annex A of the Stockholm Convention implies that Parties must take measures to eliminate the production and use of the chemicals. If there are specific exemptions for use or production, such will only apply to Parties that have applied for and have been granted the exemptions.

The listing of chemicals in Annex B of the Stockholm Convention for restricted use, implies that Parties must take measures to restrict the production and use of the chemicals listed in light of any applicable acceptable purposes or specific exemptions listed in the Annex.

The listing of chemicals in Annex C of the Stockholm Convention, are for those chemicals that are produced or released unintentionally, and Parties must take measures to reduce the unintentional releases of chemicals listed under Annex C with the goal of continuing minimization and, where feasible, ultimate elimination.

3. Table 1: Chemicals recommended for listing under the Stockholm Convention

Candidate POPs	Chemical identity	General uses
Chlorinated paraffins with carbon chain lengths in the range C_{14-17} and chlorination levels at or exceeding 45 per cent chlorine by weight	**Full Name**: • Alkanes, C14-17, chloro **Synonyms**: • Medium-chain chlorinated paraffins (MCCPs) • Chlorinated paraffins, C_{14-17} **Molecular formula**: • $C_{14}H_{24}C_{l6}$ • $C_{17}H_{29}C_{l7}$ **CAS No**. 85535-85-9	Principal constituents of substances called medium-chain chlorinated paraffins (MCCPs) in Europe, North America and Australia, and major constituents of several products manufactured in Asia. MCCPs have a number of use such as a secondary plasticizer in polyvinyl chloride (PVC), adhesives, sealants, paints and coatings; a flame retardant in PVC and rubber compounds, adhesives, sealants, paints and coatings, and textiles; an extreme pressure lubricant and anti-adhesive for metal working fluids; a waterproofing agent for paints, coatings and textiles; and a carrier solvent for colour formers in paper manufacture.
Candidate POPs	**Chemical identity**	**General uses**
Long-chain perfluorocarboxylic acids, their salts and related compounds	**Full-Name**: 2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,9-heptadecafluorononanoic acid **Synonyms:** • PFNA;C1800; Heptadecafluorononanoic acid; Perfluorononanoic acid; Perfluoropelargonic acid **Molecular formula:** • $CnF_{2n+1}CO_2H$ (where $8 \leq n \leq 20$)	Perfluorocarboxylic acids (PFCAs) are members of the per- and polyfluoroalkyl substances (PFAS) chemical class. PFCAs with carbon chain lengths from 9 to 21 and their salts are infrequently used in products. Nonetheless, the ammonium salt of C9 PFCA was identified as being used for surfactant applications and in the production of fluoropolymers. Substances that are related compounds to long-chain PFCAs have, however, been used in a range of applications, including in coating products, fabric/ carpet protectors, textile

	CAS No. 375-95-1; 335-76-2; 2058-94-8; 307-55-1; 376-06-7; 72629-94-8; 141074-63-7; 67905-19-5; 57475-95-3; 16517-11-6; 133921-38-7; 68310-12-3	impregnation agents and firefighting foams. C9-14 PFCAs, their salts and related compounds may also be unintentionally produced during the manufacturing of PFAS, including those containing a carbon chain of less than nine carbon atoms, and in other industrial processes.
Candidate POPs	**Chemical identity**	**General uses**
Chlorpyrifos	**Full Name:** • O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) phosphorothioate **Trade Names:** • Dursban, OMS 0971, Lorsban, Brodan, Killmaster, Pyrinex, Suscon, Coroban, Terial, Danusban, Durmet, Eradex **Synonyms:** • chlorpyriphos; chlorpyrifos-ethyl; chlorpyriphosethyl; O,O-diethyl O-3,5,6-trichloro-2-pyridinyl phosphorothioate; phosphorothioic acid, O,O-diethyl O-(3,5,6 trichlor-2-pyridinyl) ester **CAS No.** 2921-88-2	Chlorpyrifos is a broad-spectrum chlorinated organophosphate insecticide widely used in agriculture and as a biocide for non-agricultural pests. It has been used on various crops (corn, soybeans, alfalfa, oranges, wheat, and walnuts) as well as on lawns and ornamental plants. There are also public health uses, including adulticidal fogger treatments for mosquitoes, and the control of fire ants and certain species of ticks that may transmit diseases.

4. CHEMICALS RECOMMENDED FOR LISTING UNDER THE ROTTERDAM CONVENTION

Candidate chemicals that are subject to the prior informed consent (PIC) procedure for the Rotterdam Convention, include chemicals that have been banned or severely restricted by national regulatory actions and the respective Final Regulatory Actions (FRAs) from Parties in two different UN regions, have been found to meet the criteria of Annex II to the Convention. Listing of recommended chemicals in Annex III to the Rotterdam Convention, implies that those chemicals should be subjected to the Prior Informed Consent (PIC) procedure. The PIC procedure is a mechanism for formally obtaining and disseminating the decisions of importing Parties, as to whether they wish to receive future shipments of those chemicals listed in Annex III to the Convention, and for ensuring compliance with these decisions by exporting Parties. All Parties are required to take a decision as to whether or not they will allow future import of each of the chemicals in Annex III to the Convention. These decisions are known as import responses. All exporting Parties are required to ensure that the export of chemicals, subject to the PIC procedure, do not occur contrary to the decision of each importing Party.

5. Table 2: Chemicals recommended for listing under the Rotterdam Convention

Candidate POPs	Chemical identity	General uses
Carbosulfan	**Chemical Name:** • 2,3-dihydro-2,2-dimethylbenzofuran-7yl(dibutylaminothio)methylcarbamate	• Carbosulfan is an insecticide with contact and stomach action. It is used to

	Molecular formula • $C_{20}H_{32}N_2O_3S$ **Trade names** • Marshal 10G (GR); • Marshal 25CS; • Marshal 25 EC • PROCOT 40 WS • Posse 10G, **CAS No.**55285-14-8	control a wide range of soil-dwelling and foliar pests in cotton, sugar beet, potato, rice, fruit, maize, vegetables, sugar cane and coffee.
Fenthion (ultra-low volume (ULV) formulations at or above 640 g active ingredient/L)	**Chemical Name**: • Fenthion 640 ULV **Molecular formula** • $C_{10}H_{15}O_3PS_2$ **Trade Names** • Phosphorothioicacid (H3PO3S), • O,Odimethyl O-4-(methylthio)-m-tolyl ester (6Cl); • Phosphorothioicacid, O,Odimethyl O-[4-(methylthio)-m-tolyl] ester (8Cl); • m-Cresol, 4-(methylthio)-,O-ester with O,O-di-Me phosphorothioate (6Cl); • B 29493; • BAY 29493; • Baycid; • Bayer 9007; • Baytex; • Dimethyl 4-methylthio-mtolyl phosphorothioate; • ENT 25540; • Entex; • Fenthionmethyl; • Lebaycid; MPP; • MPP(pesticide); • Mercaptofos; • Merc aptophos; • O,O-DimethylO-4- (methylmercapto)-3-methylphenyl thiophosphate; • O,O-DimethylO-[4- (methylthio)-m-tolyl] phosphorothioate; • OMS 2; • Queletox; • Spotton; • Talodex	• Fenthion is a contact and stomach insecticide used against many sucking, biting pests. • It has been widely used in sugar cane, rice, field corn, beets, pome and stone fruit, citrus fruits, pistachio, cotton, olives, coffee, cocoa, vegetables, and vines.

	CAS-No.(s) 55-38-9	
Liquid formulations (emulsifiable concentrate and soluble concentrate) containing paraquat dichloride at or above 276 g/L, corresponding to paraquat ion at or above 200 g/L.	**Chemical Name**: • Paraquat dichloride **Molecular formula**: $C_{12}H_{14}N_2Cl_2$ (paraquat dichloride); $C_{12}H_{14}N_2$ (ion) **Synonyms**: • Paraquat dichloride: • 1,1'-dimethyl-4,4'-bipyridinium dichloride • Methyl viologen • Dextrone X • Gramoxone® Super **CAS-No.(s)** • 4685-14-7 (paraquat ion) • 1910-42-5 (paraquat dichloride) • 27041-84-5 (paraquat bistribromide) • 2074-50-2 (paraquat bis(methylsulfate)	• Used as a herbicide (pre-emergence of crops and post emergence of weeds) for use on bananas, citrus, cacao, coconut trees, coffee tree, oil palm, plantain, rubber tree, tea shrubs, avocado trees, cashews, mango trees, papaya trees, sugar cane, cotton, maize, rice, sorghum, non-cultivated land, industrial land, railroads and roadsides for the controls of weeds such as grass and dicotyledonous plants.
Acetochlor	**Chemical Name**: 2-chloro-N-ethoxymethyl-6'-ehtylacet-o-toluidide **Synonym**: CA:2-chloro-N-(ethoxymethyl)-N-(2-ethyl-6-methylphenyl) acetamide **Molecular formula** $C_{14}H_{20}ClNO_2$ **Trade Names**: • Acenit, • Guardian, • Harness, • Relay, • Sacemid, • Surpass, • Top-Hand, • Trophy and Winner • ACEDAF 400 EC, • ACEPROMAÏS 400 SC, • ACEPRONET 400 EC, • ACETO 900 EC, • ACETOCAL 900 EC • HERBISUPER KEYTOCHLORE 900 EC **CAS-No.(s)** 34256-82-1	Acetochlor is a selective herbicide that controls a broad spectrum of annual grasses, sedge, and broadleaf weeds primarily in corn

Methyl Bromide	**Common name**: Bromomethane **Synonym**: Monobromomethane **Molecular formula**: CH_3Br **Trade names**: Dowfume; Halon 1001; M-B-R98; AB-01916; Bercema; Tri-Brom-Methyl-Bromide-Rodent-Fumigant; Brom-O-Sol; Caswell-No-555; Curafume; Detia Gas Ex-M; Dowfume MC-2; Dowfume MC-33 Dowfume MC-2 Soil Fumigant; Edco; Embafume; EPA-Pesticide-Cbemical-Code-053201; M-B-C Fumigant; Brom-O-Gas; Brom-O-Gas Methyl Bromide Soil Fumigant; Haltox; Iscobrome; Kayafume; MB; MBC-Soil-Fumigant; MBC-33 Soil Fumigant; MBX; Dowfume MC-2R; Dowfume MC-2 Fumigant; MEBR; Metabrom; Meth-O-Gas; Methogas; Superior Methyl Bromide-2; Metbyl-fume; Pestmaster; Pestmaster Soil Fumigant; Drexel-Plant-Bed-Gas; Rotox; Terabol; Terr-O-Gas; Zytox(HSDB); Celfume; Dawson 100; Metafume; Profume; R 40B I; RCRA wast number U029; Terr-O-Cide; Terr-0-Gas 67; Terr-O-Gas 100 (RTECS); Brozone; Isobrome, Mebrom 100, Desbrom, MBR-2, Methybrom, Methyl-o-gas, Sobrom 9B. **CAS-No.(s)** 74-83-9	Methyl bromide was used as a soil fumigant. The use of gaseous formulations of methyl bromide is still allowed for quarantine treatment in the control of quarantine pests in agricultural products and packaging at ports and border crossings. Use of authorized and airtight fumigation chambers is required. In the Netherlands methyl bromide was used as a fungicide and as a soil disinfectant (fungicide/nematicide). Space fumigation in gasproof rooms is still allowed.
Paraquat	**Chemical Name** Paraquat ion: • 1,1'-dimethyl-4,4'- bipyridinium Paraquat dichloride: • 1,1'-dimethyl-4,4'- bipyridinium dichloride **Synonym**: • Methyl viologen **Molecular formula**: • $C_{12}H_{14}N_2C_{l2}$ (paraquat dichloride); $C_{12}H_{14}N_2$ (ion) **Trade names**: • Gramoxone® 100; • Capayam;	• Paraquat is important to agricultural development, due to its broad herbicidal spectrum and fast acting effect, making it an important tool for making glyphosate-resistant herbicides. Whether in hot and dry conditions or in a humid environment, paraquat acts quickly, reducing competition from weeds for nutrition and favoring crops, therefore, increasing crop yields. Applications of paraquat during the ripening stages

	• CS Paraquat 13; • Farm Care Paraquat 13; • CH Paraquat P130; • PP Paraquat 13; AGR Para • 13; WA Paraquat 130. • Paraquat 20% SL; • Paracot 20% SL; • Para-Cure 20% SL; • Paraxone 20% SL; • Gramozat 20% SL; • Agroquat 200 SL; • Universal Skoffos 14,5% SL; • Volquato 20% SL **CAS-No.(s)** • 4685-14-7 (paraquat ion) • 1910-42-5 (paraquat dichloride) • 27041-84-5 (paraquat bistribromide) • 2074-50-2 (paraquat bis(methylsulfate)	of cotton, potato and soybean crops can quickly reduce grain and plant moisture, which improves the efficiency of mechanical harvesting and reduces the wear rate of mechanical equipment. The use of paraquat can effectively reduce tillage and mixing it with no-till crops reduces fuel consumption by more than 30 liters/hectare, which helps reduce carbon emissions and saves costs for farmers. In terms of safeguarding global food security, paraquat, as an important means of agricultural production, plays a key role in ensuring production and the harvesting of crops.
Iprodione	**Chemical Name**: 3-(3,5-dichlorophenyl)-N-isopropyl-2,4-dioxoimidazolidine- 1-carboxamide **Molecular formula**: $C_{13}H_{13}Cl_2N_3O_3$ **Trade names**: • Iprodione 25,5% SC; • Rovral WG (BAS 610 06 F) • Iprodine; • Glycophene; • Chipco 26019; • Anfor; RP-26019; • Rovral; • Amazzones, • Botrix, • Dirac, • Diva, • Kidan, • Rover, • Verisan, • Viroval **CAS-No.**(s): 36734-19-7	• Iprodione is used as a fungicide in vines, fruit trees and vegetables