Glyphosate Monitoring Study

Evaluation of the exposure risks from glyphosate and associated degradation products from road-side spraying for weed control

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Monitoring Strategy (Completed Feb 2016)

- Goal To determine the risk posed by glyphosate and degradation products specifically from Government road-side weed-control to the public, government employee and the environment.
- How to understand the risk To monitor the levels of glyphosate and degradation products and to compare to the most stringent regulatory limits, taken from other jurisdictions, for human exposure via drinking water, inhalation and ingestion.
- What to monitor Glyphosate and degradation products in:
 - Drinking water (Public risk)
 - Air inside applicator cab (while spraying) (Applicator risk)
 - Air behind applicator vehicle (while spraying) (Public risk)
 - Groundwater, pond-water (Environmental risk)
 - Road-side soils and pond sediments (Environmental risk)
 - Foodstuffs from supermarket shelves (to provide scale to the exposure)

Methodology (1/2)

- Ministry of Public Works
 (MPW) use Dow Chemicals
 Glyphosate concentrate
 (Rodeo®) diluted in water to 0.53 to 0.56%.
- Two spray settings average swath of 4ft. Approx. 40ml/m².
- 100 Gal container ~ 60 mins
- 5am-7.30am & 9am-12noon
- No spraying wind >10mph or raining.
- Air sampling equipment based on US Occupational Safety & Health Administration (OSHA) Method PV2067.





In-Cab Air Filter

Air Filter at back of truck



Methodology (2/2)

- AXYS Analytical Services Ltd, BC, Canada was down-selected from many laboratories in US, UK and Canada to monitor glyphosate and the two known degradation products in all matrices (air filters, water, soils/sediments, foodstuffs), at very low method detection limits.
- DENR could not identify a laboratory in the US, Canada or UK that could detect the surfactants used in *RoundUp*[®] and *Rodeo*[®] at the appropriate detection limits.
- AXYS Detection limits for glyphosate and degradation products:
 - Water 10 nano-grams per litre (ng/l) (i.e. 0.000,000,01 g/l)
 - Soils/Sediments 30 nano-grams per gram (ng/g) (i.e. 0.000,000,03 g/g)
 - Air 0.7 nano-grams per litre (ng/l) (i.e. 0.000,000,000,7 g/l)
 - Foodstuffs 0.4 nano-grams per gram (ng/g) (i.e. 0.000,000,000,4 g/g)

Glyphosate Legislative Limits – Other Jurisdictions

Potable Water Limits

Country	Organisation/ Standard	Glyphosate Concentration Limit (ng/l)	Comment
UK	Drinking Water Inspectorate (DWI) ^[1]	100	Measured at consumers tap. 2010
EU	Drinking Water Directive	100	Applies to any pesticide.
US	Environmental Protection Agency (EPA) [2]	700,000	Maximum contaminant Level Goal (MCLG) and Maximum Contaminant Level (MCL)
Canada	Guidelines for Canadian Drinking Water Quality 1987 ^[3]	280,000	Maximum Acceptable Concentration (MAC). 2008.
Australia	Australian Drinking Water Guidelines 6 (2011) [4]	1,000,000	February 2016

UK Drinking Water Inspectorate (DWI). Drinking Water Standards. Jan 2010.

US Environmental Protection Agency (EPA) National Primary Drinking Water Regulations (NPDWR), EPA 816-F-09-004, May 2009.

Canadian Water Quality Guidelines and associated Report Rationale – prepared by the Task Force on Water Quality Guidelines of the Canadian Council of Ministers of the Environment, Nov, 2008.

Australian Drinking Water Guidelines 6 2011. National Water Quality Management Strategy. National Health and Medical Research Council. Ver. 3.2, Updated February 2016. ISBN: 1864965118.

Glyphosate Legislative Limits – Other jurisdictions

Inhalation Limits

- American Conference of Government Industrial Hygenists (ACGIH) does not set Threshold Limit Values (TLV) for Glyphosate.
- EU does not have any defined occupational exposure limits.
- US Occupational Safety & Health Administration (OSHA) does not set Permissible Exposure Limits (PEL) for Glyphosate.
 - However, OSHA has set an arbitrary limit of 1 mg/m³
- DENR will consider any other occupational exposure limits for inhalation that are more stringent for glyphosate than that set by OSHA.

Glyphosate Legislative Limits – Other jurisdictions

Ingestion Limits (Acceptable Daily Intake Levels)

- Acceptable Daily Intake (ADI) levels are set based on a suitable safety margin below the lowest high-concentration displaying 'No Observable Adverse Effect Level" (NOAEL) for a particular effect on test animals.
- For a range of effects then the lowest high-concentration NOAEL is used.
- The safety margin is usually 100 times lower than the NOAEL (based on animal tests) or 10 times lower based on human data.
- ADI is considered the safe intake level for a healthy adult of normal weight who consumes average daily amounts of the substance in question.
- ADI levels identified include:
 - US EPA Chronic Reference Dose (cRfD) = 1.75 mg/kg body weight per day (1.75mg/kg bw /day)
 - European Food Safety Authority (EFSA) Acceptable daily Intake (ADI) for consumers = 0.5 mg/kg bw /day
 - World Health Organization (WHO) ADI = 0.3 mg/kg bw /day
 - EFSA Acceptable Operator Exposure Level (AOEL) = 0.1 mg/kg bw /day



RESULTS – Potable Water / Groundwater

		Degradation Products		
Description	Glyphosate (ng/l)	Glufosinate (ng/l)	Aminomethyl- phosphonic Acid [AMPA] (ng/I)	
GROUNDWATER Monitoring Well - Vesey St North (CVSN)	<10.4	<10.3	<10.2	
GROUNDWATER Monitoring Well - Orange Valley (CORV)	10.2	<9.84	<9.74	
Cloverdale POND WATER	10.8	<10.2	<10.1	
GROUNDWATER FEED (INFLUENT) to Government Potable water RO Plant (Prospect location)	<10.2	<10.1	<9.98	
POTABLE WATER * from Government (Prospect) RO Plant	<10.2	NQ	NQ	

[&]quot;NQ" - Not Quantifiable - Low sample recovery (i.e. 10%) based on internal standard.

MPW Water Section analyse for many chemicals in their potable water:
 To date glyphosate always below detection limits (i.e. <10,000 ng/l)



[&]quot;<" - Below stated detection limit

^{* -} Potable water limits for EU: 100 ng/l; US: 700,000 ng/l; Canada: 280,000 ng/l; Australia: 1,000,000 ng/l

RESULTS – Other Chemicals Gov't Monitors in Potable Water

- Other chemicals listed
 (opposite) are determined
 from the Government potable
 water plants 2015: Tynes
 Bay SWRO, Tudor Hill,
 Prospect, St George's and the
 Distribution Lines.
- These ensure that the water complies with standards of UK Drinking Water Inspectorate
- To date glyphosate always below detection limit (*i.e.* <10,000 ng/l)

Short Traffing

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	Parameter Determined	Units	Concen- tration	
	Inorganics			Р
	Nitrate + Nitrite	mg/L	0.1 - 2.3	Te
	Nitrate	mg/L	0.1 - 2.3	Te Pa
	Nitrite	mg/L	<0.01	G
	Turbidity	NTU	<0.2	GDGL
	Dissolved Sulphate	mg/L	8 - 21	D
	Phenols-4AAP	mg/L	<0.001	G
	pН	рН	7 - 8	Li
	Fluoride	mg/L	<0.1	H
	Total Dissolved Solids	mg/L	240 - 320	A
	Mercury	mg/L	<0.0001	H
	Pesticides and Herbicide	s (&Se		0
	Simazine	μg/L	<1	a-
	Prometryne	μg/L	<0.25	g-
	Picloram	μg/L	<5	М
	Phorate	μg/L	<0.5	D
	Pentachlorophenol	μg/L	<0.5	p,
	Ethyl Parathion	μg/L	<1	0,
	Metribuzin (Sencor)	μg/L	<5	<u>o,</u> p,
	Metolachlor	μg/L	<0.5	0,
	Malathion	μg/L	<5	<u>p,</u>
	Dinoseb	μg/L	<1	0,
				P
	Dimethoate	μg/L	<2.5	Α
	Diclofop-methyl	μg/L	<0.9	A
	Dicamba	μg/L	<1	<u>A</u>
	Diazinon	μg/L	<1	A
	Cyanazine (Bladex)	μg/L	<1	A
	Chlorpyrifos (Dursban)	μg/L	<1	A
	Carbofuran	μg/L	<5	A
	Ondered		_	v
	Carbaryl	µg/L	<5	_
	Bromoxynil	µg/L	<0.5	B
	Bendiocarb	µg/L	<2	<u> </u>
	Atrazine + Desethyl-atrazine	μg/L	<1	Bi
	Des-ethyl atrazine	μg/L	<0.5	<u>D</u>
	Atrazine	μg/L	<0.5	10
	Aldicarb	μg/L	<5	C
	Alachlor	μg/L	<0.5	<u>C</u>
	2,4-Dichlorophenol	μg/L	<0.5	To
	2,4-D	μg/L	<1	0,
	2,4,6-Trichlorophenol	μg/L	<0.5	0,
	2,4,5-T	μg/L	<1	0,
	2,3,4,6-Tetrachlorophenol	μg/L	<0.5	H
Т	Terbufos	μg/L	<0.5	D
ı	Triallate	μg/L	<1	<u>c</u>
tι		μg/L	<1	A
	Benzo(a)pyrene	μg/L	<0.009	

n-	Parameter Determined	Units	Concen-			
ì	- Farameter Determined	Units	tration			
	Pesticides and Herbicides					
3	Temephos	μg/L	<10			
3	Paraquat	μg/L	<1			
	Guthion (Azinphos-methyl)	μg/L	<2			
	Diuron	μg/L	<10			
	Diquat	μg/L	<7			
	Glyphosate	μg/L	<10			
	Lindane	μg/L	<0.006			
	Heptachlor	μg/L	<0.006			
20	Aldrin	μg/L	<0.006			
1	Heptachlor epoxide	μg/L	<0.006			
	Oxychlordane	μg/L	<0.006			
	a-Chlordane	μg/L	<0.006			
	g-Chlordane	μg/L	<0.006			
	Methoxychlor	μg/L	<0.02			
	Dieldrin	μg/L	<0.006			
	p,p-DDT	μg/L	<0.006			
	o,p-DDT	μg/L	<0.006			
	p,p-DDD	μg/L	<0.006			
	o,p-DDD	μg/L	<0.006			
	p,p-DDE	μg/L	<0.006			
	o,p-DDE	μg/L	<0.006			
	Poly-Chlorinated BiPhenyls					
	Aroclor 1248	μg/L	<0.05			
	Aroclor 1242	μg/L	< 0.05			
	Aroclor 1232	μg/L	<0.05			
	Aroclor 1221	μg/L	<0.05			
	Aroclor 1016	μg/L	<0.05			
	Aroclor 1254	μg/L	<0.05			
	Aroclor 1260	μg/L	<0.05			
	Volatile Organics					
	Bromodichloromethane	μg/L	<0.1			
	Chloroform	μg/L	0.1			
	Bromoform	μg/L	0.4 - 1.8			
	Dibromochloromethane	μg/L	<0.2			
	Total Trihalomethanes	μg/L	0.4 - 1.8			
	Calculated Parameters					
	Total PCB's	μg/L	<0.05			
	Total Endosulfan	μg/L	<0.005			
	o,p-DDT + p,p-DDT	μg/L	<0.006			
	o,p-DDE + p,p-DDE	μg/L	<0.006			
	o,p-DDD + p,p-DDD	μg/L	<0.006			
	Heptachlor + Heptachlor epoxide	μg/L	<0.006			
	DDT+ Metabolites	μg/L	<0.006			
	Chlordane (Total)	μg/L	<0.006			
	Aldrin + Dieldrin	μg/L	<0.006			
)						

RESULTS – Potable Water / Groundwater

Environmental Limits

Canadian Water Quality Guidelines and California State Water Resources
Board for the protection of aquatic life all provide limits that are well above
the EU/UK drinking water limit. Organisms within **Bermuda's ponds** are
therefore not expected to be impacted by glyphosate.

Conclusions:

- Glyphosate was not detected in the potable water of Bermuda that is generated by Government from groundwater resources.
- Glyphosate was detected in the groundwater and pond water at a concentration that was close to the detection limit of the methodology and was well below the most stringent drinking water standard found (*i.e.* EU/UK) by a factor of 10.
- Glyphosate concentrations in pond water were many orders of magnitude below the stated toxic level effects on organisms that inhabit the ponds.
- Results are consistent with understood partitioning of glyphosate from aqueous/water to solid/particulate fractions.



RESULTS – Soils and Sediments

		Degradation Products		
Description	Glyphosate (ng/g)	Glufosinate (ng/g)	Aminomethyl- phosphonic Acid [AMPA] (ng/g)	
SEDIMENT - Cloverdale Pond	<31.3	<31.0	<30.7	
SEDIMENT - Cloverdale Pond (DUPLICATE)	<30.4	<30.1	<29.8	
SOIL - McGall's Hill - Roadside (sprayed more than 4 months prior)	886	<27.1	618	
SOIL - Harrington Sound Road - Roadside (Near Quarry) (sprayed more than 4 months prior)	949	<29.3	1,310	
SOIL - North Shore Road - Roadside (near Tynes Bay) (Sprayed within 1 week of sampling)	6,120	<27	1,670	
SOIL - Black Watch Pass - Roadside (Western side) (Sprayed within 1 week of sampling)	51,200 *	<27.4	7,250	

- DENR is not aware of any sediment quality guidelines for glyphosate.
- Canadian Council of Ministers of the Environment (CCME) Pesticide limits:
 - 0.7mg/kg (**700 ng/g**) Agricultural and Residential zoned Land.
 - 12 mg/kg (**12,000 ng/g**) Commercial and Industrial zoned land.



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RESULTS – Soils and Sediments

- It is noted that the Canadian CCME limits apply to any "Pesticide" irrespective of relative toxicity.
- It is noted that the CCME have more stringent standards for soils in residential/commercial zoned land (compared to industrial zoning).
 - This is due to increased risk of ingesting soil (with associated pollutants) from residential (*i.e.* from playing in gardens) or agricultural (*i.e.* from soil attached to crops) zoned areas.
- Data suggests that:
 - Roads located alongside agricultural land should have an alternative, non-pesticide weeds control measure applied in order to ensure that the agricultural land meets appropriate soil quality guidelines. Run-off captured into catch basins / soakaways will capture the herbicide.
 - Soils along roadsides that have glyphosate directly applied should be considered as indicative of 'Industrial/Commercial' soil grade and, based on Canadian CCME, are not recommended for growing of produce.
 - Glyphosate does not appear to be present in pond sediments in Bermuda.

RESULTS – Air Inside Applicator Cab & Air Behind Applicator Vehicle – **Inhalation Limit**

Sample No.	Description	Vehicle Route	Glyphosate (ng/litre)	Glyphosate (mg/m³)	Glufosinate (ng/litre)	Aminomethyl- phosphonic Acid [AMPA] (ng/litre)
1C	Inside Cab	BlackWatch Pass,	13.3	0.013	<0.71	<0.70
1R	Behind Vehicle	North Shore Road	17.6	0.018	<0.71	<0.70
2C	Inside Cab	North Shore Road	33.7	0.034	<0.71	<0.70
2R	Behind Vehicle	Devonshire	33.8	0.034	<0.71	<0.70
3C	Inside Cab	North Shore Road,	31.6	0.032	<0.71	<0.70
3R	Behind Vehicle	Devonshire.	24.7	0.025	<0.71	<0.70
4C	Inside Cab	Southside Road,	25.9	0.026	<0.71	<0.70
4R	Behind Vehicle	St George's	46.8	0.047	<0.71	<0.70
5C	Inside Cab	Barkers Hill, North	21.7	0.022	<0.71	<0.70
5R	Behind Vehicle	Shore Road.	28.0	0.028	<0.71	<0.70

- Concentrations inside the applicator cab and behind the vehicle were not significantly different.
- Airborne concentrations were well below the **OSHA inhalation limit of 1 mg/m³** (*i.e.* equivalent to 1000 ng/litre) (*i.e.* 46.8 ng/l = 0.047 mg/m³ = <5% OSHA limit)



RESULTS – AIR - Inside Applicator Cab Comparison to Ingestion Limits

- Comparing the air borne concentrations of glyphosate to the most stringent ingestion limit from other jurisdictions (i.e. EFSA AOEL ADI 0.1 mg/kg bw /day) requires certain assumptions:
 - All inhaled air and associated aerosols is retained in the body (i.e. not exhaled). Also assumes operator not wearing a PPE mask.
 - Average weight of person ~60kg (i.e. EFSA ADI = 6 mg glyphosate /day)
 - Breathing rate of average person = 11 litres air per minute (While driving)
 DENR assumed double the breathing rate = 22 litres/min (equiv. to walking)
 - Critical group considered to be MPW herbicide applicator employee who spends ~5.5 hours per day spraying. DENR assumes 8-hour working day.
 - Worst case highest volume of air inhaled by applicator = 10.6 m³/day.
 - Using highest airborne glyphosate concentration (i.e. 46.8 ng/l) equates to a daily intake of (10,600 x 46.8) 496,080 ng = 0.496 mg glyphosate per day.
 - 0.496 mg of inhaled glyphosate compared to an EFSA ADI of 6mg/day is
 less that 9% of the most stringent Acceptable Daily Intake by ingestion.

RESULTS – FOODSTUFFS from Supermarkets (Imported items purchased locally)

Sample Description	Glyphosate (ng/g)	Glufosinate (ng/g)	Aminomethyl- phosphonic Acid [AMPA] (ng/g)
Whole Wheat Flour	603	<0.459	40
	171	<0.465	11
All Purpose Flour - Triplicate	190	<0.461	9.48
Triplicate	241	<0.447	16.4
Quick Oats	1140	<0.439	34.7
Popcorn	<0.47	<0.466	<0.461
Popcorn - Non-GMO	<0.467	<0.463	<0.458
Cornflakes	10.8	<0.422	<0.418
Cornmeal (Organic)	<0.452	<0.447	2.01
Cornmeal	26	<0.452	3.04

RESULTS – FOODSTUFFS from Supermarkets (Imported items purchased locally)

Sample Description	Glyphosate (ng/g)	Kilograms of food stuff required to exceed EFSA AOEL ADI daily limit of 0.1 mg/kg bw /day (kg) ‡	Amount of foodstuff to be consumed per day to be equivalent to the exposure risk of the MPW herbicide applicator employee at 0.496 mg per 8-hr day (kg)
Whole Wheat Flour	603	10	0.82
All Purpose Flour -	171	35	2.90
Triplicate sample for	190	32	2.61
determination of analytical precision.	241	25	2.06
Quick Oats	1140	5.3	0.44
Popcorn	<0.47	N/A	NA
Popcorn - Non-GMO	<0.467	N/A	NA
Cornflakes	10.8	556	45.93
Cornmeal (Organic)	<0.452	N/A	NA
Cornmeal	26	231	19.08

[‡] European Food Safety Agency (EFSA) Acceptable Operator Exposure Level (AOEL) limit of 0.1 mg/kg body weight per day for a 60 kg person equates to 6 mg/day per person.

RESULTS – FOODSTUFFS from Supermarkets (Imported items purchased locally)

- The foodstuffs were analysed only to provide some scale to the exposure posed by Glyphosate from the MPW road-side weed control programme.
- Glyphosate was present in most foodstuffs sampled, however, the levels are considered to be safe according to both the World Health Organization (WHO) and European Food Safety Agency (EFSA) relative to their most stringent Acceptable Daily Intake (ADI) levels from ingestion.

CONCLUSIONS

- The purpose of this study was to determine whether there was a health risk to the public, to the MPW employee and to the environment from glyphosate exposure, specifically from the MPW roadside weed control programme.
- Comparison with the most stringent inhalation and ingestion standards stipulated in legislation from overseas jurisdictions suggests that the exposure risk to the public and the MPW employee posed by roadside weed control using glyphosate in Rodeo® is negligible.
- Similarly, the glyphosate exposure risk to organisms that inhabit Bermuda's ponds was negligible.
- Public exposure to glyphosate from foodstuffs imported to Bermuda from overseas and purchased locally was shown to exist. However, the level of exposure was shown to be well within the most stringent acceptable ingestion limits assessed from other jurisdictions.
- If, as a result of substantiated data and studies, overseas jurisdictions reduce their legislated acceptable levels of glyphosate in air, water and foodstuffs then DENR can revisit the existing data to determine whether further mitigation is required.

RECOMMENDATIONS (1/3)

- Based on the data collected and the most stringent legislated standards from overseas jurisdictions DENR cannot justify the continuation of the current suspension on importation of concentrated glyphosate for use with roadside weed control.
- DENR recommends to the Minister of the Environment that the current import suspension on glyphosate concentrate be lifted once all of the following recommendations have been adhered to:
- DENR will monitor overseas legislation (UK, EU, CAN, US, AUS, etc and WHO) for any future changes (i.e. changes to most stringent glyphosate limits for ingestion and inhalation) to determine whether these recommendations need to be revised.
- DENR will continue to monitor and manage the import of various pesticides into Bermuda as it is mandated to do under the Pesticide Safety Act 2009. Environmental monitoring of groundwater, soils and Bermuda's ponds will require further budget to maintain such a baseline dataset going forward.

RECOMMENDATIONS (2/3)

- DENR acknowledges that with any environmental chemical treatments that a
 precautionary approach be taken. Use of chemical inhibitors should only be
 considered once other more environmentally-sustainable control measures have
 been considered and their use discounted for acceptable reasons.
- DENR recommends that the importation of concentrated pesticide formulations (*i.e.* Not *Ready-To-Use*) or restricted pesticides should be controlled and limited to personnel who have demonstrated sufficient training and certification.
 - Dept. of Health (DoH) to oversee a competency applicator programme with training, certification and named competent persons (Timing – TBD).
 - DoH competent applicator programme Expected to be based on US National Core Pesticide Applicator Programme (TBD by DoH).
 - Competent personnel must follow a *Risk Assessment* process and an *Integrated Pest Management* (IPM) process in order to consider minimizing the reliance on chemical controls.
 - Competent person to have Annual Health Assessments (managed by DoH and Chief Medical Officer).

Recommendations: Integrated Pest Management

- Also referred to as Integrated Pest Control (IPC) the United Nations Food and Agriculture Organisation defines IPM as:
 - "the careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations and keep pesticides and other interventions to levels that are economically justified and reduce or minimise risks to human health and the environment."
- The main emphasis of IPM is on 'Control' of pests (incl. weeds) and not on their eradication which is deemed as impossible, expensive and potentially unsafe.
- IPM puts emphasis on preventative practices, monitoring, mechanical controls (weeding crews, burning, steam) and biological controls before moving to the responsible use of synthetic pesticides. Suggestions welcome!
- Recent IPM Activities:
 - While the suspension of concentrated glyphosate has been occurring DENR did conduct some trials in Sept 2016 on using alternative methods of roadside weed control. DENR used the saline concentrate (1.5 times seawater concentration) from one of the SWRO plants with 0.1% detergent to determine its effect on weed control. Unfortunately, the results showed that after a short die back period that the weeds grew back quickly (within days) compared to the 0.53% glyphosate test (many weeks).

RECOMMENDATIONS (3/3)

- Subsequent to the Pesticide Applicator following the 'Risk Assessment' and 'IPM' processes DENR recommends that MPW do not use glyphosate in roadside areas that drain directly into agricultural land. In many areas roadside run-off is captured by catch basins (1147 catch basins in Bermuda) and glyphosate is known to readily partition out of the water and into sediments and particulates that are subsequently caught by these catch basins.
- DENR can provide data in Geographical Information System (GIS) format to MPW to assist in the allocation of exclusions around all existing agricultural zoned areas that are not serviced by roadside catch basins. This data will need to be translated into a GPS hardware system that alerts the applicator of 'where-to-spray' and 'where-not-to-spray'.
- In addition to mitigating the herbicide risk DENR would recommend that all
 roadside drainage that will contain chemicals from vehicle exhaust soot be
 managed via appropriately maintained catch basins before being allowed to drain
 into agricultural and sensitive areas (i.e. ponds). More catch basins should be
 installed in these areas identified.
- DENR recommends that MPW provide a mechanism of informing the public of the Government portal of which roadside routes are due to be sprayed and when the roadsides were last sprayed.

Thank you – Any Questions?

Questions will be gathered from this meeting and by email (PollutionControl@gov.bm) up until the 18th January and will be published on the Government portal with appropriate answers in February 2017.

Pesticide Imports to Bermuda (1/3)

- Controlled and Managed by HM Customs and DENR Plant Management Section
- Registered Pesticides that are currently controlled at point of import:

Restricted pesticides: These active ingredients are restricted due to environmental or health concerns related to the percentage of active ingredient in the product, the packaging of the product, the formulation of the product, or the intended end use (location) of the product.

- Abamectin
- Atrazine
- Azoxystrobin
- Bifenthrin
- Carbaryl
- Clothianidin
- Deet
- Dicamba

- Etridiazole
- Glufosinate ammonium
- Glyphosate
- Total release home foggers
- Hydramethylnon
- Mancozeb
- Neo-nicotinoids

- Oxadiazon
- Pentachloronitrobenzene
- Permethrin
- Propxur
- Rimsulfuron
- Tridimefon
- Trifloxysulfuronsodium

Pesticide Imports to Bermuda (2/3)

Prohibited pesticides: These active ingredients are prohibited importation due to environmental or health concerns.

- Aldrin
- Bendiocarb
- Bromethalin
- Captan
- Chlordane (and all related chemicals)
- Chlorpyrifos
- Dacthal
- DDD (and all related chemicals)
- DDE (and all related chemicals)
- DDT

- DDVP
- Diazinon
- Diclofop-methyl
- Dieldrin
- Dioxin
- Endosulfan
- Ethion
- Heptochlor
- Isofenphos
- Isoxaben
- Kepone
- Lindane
- Methoxychlor

- Methyl-bromide
- Mirex
- Oryzalin
- Oxyfluorfen
- Paraquat
- Prodiamine
- Pronamide
- Quinclorac
- Tetrachlorvinphos
- Toxaphene
- Trichlorfon
- Triforine

Pesticide Imports to Bermuda (3/3)

- Controlled and Managed by HM Customs and DENR Plant Management Section
- Registered Pesticides that are currently controlled at point of import:

Approved for Importation

- 2,4 –D
- Bromoxynil One importer (Nursery)
- Dimethoate
- Diquat (diquat dibromide)
- Malathion
- Trifluralin

WHO International Agency for Research on Cancer (IARC) (1/3)

 Definitions of Chemicals or Activities with Respect to Carcinogenicity to Humans.

Table A.2.1. Agents Classified by the IARC with respect to carcinogenicity

IARC Group #	Carcinogenic rating to humans	Number of agents/chemicals
Group 1	Carcinogenic to humans.	118 Agents
Group 2A	Probably carcinogenic to humans.	79 Agents
Group 2B	Possibly carcinogenic to humans.	291 Agents
Group 3	Not classified as to its carcinogenicity to humans.	507 Agents
Group 4	Probably not carcinogenic to carcinogenic to humans.	1 Agent

(http://monographs.iarc.fr/ENG/Classification/)

WHO International Agency for Research on Cancer (IARC) (2/3) "Probable Carcinogens"

Example IARC Group 2A Compounds (79 total) Products and Activities where the agent is either use present			
Certain Poly Aromatic Hydrocarbons (PAH's)	Including Dibenz[a,h]anthracene and Dibenzo[a,i]pyrene. Found in motor oil, soot, smoke, open fires, road runoff, etc.		
Dichorormethane.	Occurs naturals in the environment at low levels but is largely produced industrially as a solvent in paint strippers, degreasers, decaffeinated coffee/tea.		
Acrylamide.	Used in binding chemicals, cement, pesticides and cosmetics. Found i cigarette smoke, certain starchy foods after heating (Frying, baking) thoug expected dose is 500 times lower than dietary intake limits.		
Malathion	Used in Bermuda as a general use insecticide and for household use from retail stores (e.g. Ortho), used in treatment of head lice.		
Creosotes (from coal and wood tars)	Used as a preservative for treating wood and has some medical uses.		
Anabolic steroids Found in certain sports/body building dietary products to experimens performance, prescribed medicines,			
Glyphosate	Herbicides manufactured by Monsanto, Dow Chemicals and a range of companies in China.		
Activities/Occupation:	Manufacture of glass, art glass, burning wood, Hairdresser/barber, hi temperature frying, Petroleum refining, consumption of red meat.		



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WHO International Agency for Research on Cancer (IARC) (3/3) "Carcinogenic"

Example IARC Group 1 Compounds (118 total)	Products and Activities where the agent is either used or is present		
Certain Poly Aromatic Hydrocarbons (PAH's) Benzo[a]pyrene	Found in motor oil, soot, smoke, open fires, road runoff, etc.		
Acetaldehyde	Present in indoor air in especially new buildings and associated with other volatile organic compounds. Present in emulsion paint, particle board, chipboard and other woods and tobacco smoke.		
Formaldehyde	Naturally forming and also present in particle board, various coatings and resins.		
Ethanol	Alcoholic beverages		
Benzene	Crude oil, gasoline (exposure via automobile service stations), coa tobacco smoke.		
PCB's Used as a dielectric or coolant in early electrical transformers. Republic with environmentally friendly alternatives in Bermuda.			
Outdoor air pollution Includes both gases/vapours/VOC's and particulates (i.e. PM-10) combustion processes (See PAH's)			
Mixtures	Processed meats, wood dust, paints, mineral oils, Oestrogen-based contraceptives, coal tars, exhaust from Diesel engines.		
Activities/Occupation:	Painting, sand blasting, tanning devices, smoking, furniture/cabinet making.		



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Timeline

- **Mar 2015** WHO/IARC Classification of glyphosate raised from 'Possible carcinogen to humans' to 'Probable carcinogen to humans'.
- **May 2015** Petition from Bermuda public to Minister. Minister decided to suspend importation of glyphosate and associated products.
- Nov 2015 EFSA Stated glyphosate not carcinogenic to humans.
- **Nov 2015** Minister relaxed importation ban on dilute products (<2%).
- Feb 2016 DENR/DoH Stakeholder presentation and monitoring strategy
- May 2016 WHO/FAO Glyphosate unlikely to pose carcinogenic risk to humans from exposure through diet. No reason to change existing Acceptable Daily Intake (ADI) limits.
- **Jun 2016** Samples collected for analysis (air, water, sediment, soil, food stuffs).
- Oct 2016 Results received from AXYS Analytical Services Ltd, BC, CAN.
- **Nov 2016** DENR monitoring study report completed.

Background - Glyphosate Use (1/2)

- Glyphosate was originally developed by Monsanto to be the herbicide that their Genetically-Modified (GM) crops are resistant to.
- The patent of glyphosate ran out in 2000 and now there are a range of companies manufacturing glyphosate products.
- Glyphosate has the highest global production volume of all herbicides primarily in agriculture but it is also used in forestry and urban/home settings.
- It is not only applied to GM crops but is now also applied to non-GM crops as a pre-harvest desiccant.
- In Bermuda, GM crops are not grown and glyphosate is not known to be used by farmers on any non-GM crops.
- In Bermuda, glyphosate is primarily understood to be used for weed control.
- Importers in Bermuda of >2% glyphosate include: Government, Hotel/Condo's, Golf Courses, Plant Nurseries, Landscapers, Farmers, Pest Control Companies, Hardware/Retail Stores, Construction Companies, Private Use.
- Some farmers in Bermuda use glyphosate for weed control only (it is not applied to crops). Weed control at field borders and to prep before seeding.

