Industry Takes Positive Action on Management of HHPs

Proposed Global Alliance to Phase-Out HHPs is Redundant

The call by IPEN and PAN to establish a Global Alliance to Phase-out Highly Hazardous Pesticides has seriously misrepresented the intent of SAICM, the direction set by FAO and the implementation of the UN Sustainable Development Goals. The objectives of the Alliance suggest a duplication of existing activities in a time of limited UN resources. Highly Hazardous Pesticides (HHPs) are dealt with in the framework of FAO’s International Code of Conduct on Pesticide Management and supported by voluntary industry commitment and actions. The proposed Global Alliance to Phase-Out HHPs will bring no additional value to this important issue and is an unnecessary diversion of FAO resources.

CropLife International has voiced its support of the International Code of Conduct approach to managing HHPs. It is striving to work with FAO and other stakeholders to promote risk-based management of HHPs around the globe. This includes identifying highly hazardous products for priority risk assessment per intended use and geography. Risks should be weighed against the benefits of a products use and availability plus risks/benefits of real alternatives. Any potential unacceptable risks must be mitigated by an action plan or otherwise, the products should not be released or maintained.

It is important that farmers have a complete ‘toolbox’ to fight pests and diseases, are able to make informed choices, and have access to quality products as well as training. Regulatory authorities should have access to capacity building for pesticide risk assessment.

Listed below are six industry actions that support farmers in accessing crop protection products, build capacity with regulatory authorities, and ensure there are no unacceptable risks to human or environmental health from HHPs.

1. **Industry Commitment to Risk Management of HHPs**
   
   In 2014, CropLife International members made a commitment and have since initiated a review of their product portfolios to identify potential HHPs. Companies have started to conduct use assessments on products/formulations under conditions of use in specific geographies and taken stewardship measures to manage any HHP risks, including potential voluntary withdrawal by individual companies. Industry is encouraging the FAO and other stakeholders to help ensure all parties adhere to similar risk management measures for user and public safety; and build capacity for risk/use assessment in developing countries.

2. **Continuous Improvement in Risk Mitigation**
   
   The crop protection industry continuously improves product formulations and packaging with human and environmental protection in mind. For example, crop protection companies have put in place safety measures to prevent accidental or intentional misuse of products. Liquid formulas may be switched to gels or microcapsules that don’t dissolve in water to prevent spillage and thus reduce exposure. Prominent warnings on labels along with suitably-sized and easy-to-handle containers discourage decanting products into unlabeled, inappropriate containers. Coloring or adding a strong smell to products to avoid mistaken identity, child- or spill-resistant caps and built-in measuring devices also help protect farmers and their families. Finally, products may be restricted in use per application or geography and/or only be sold to professional applicators.
3. Farmer Training and Promotion of Integrated Pest Management

The crop protection industry promotes Integrated Pest Management (IPM), which calls for applying the right crop protection products only when needed and considering the best combination of cultural, biological and chemical measures to manage pests and diseases. The crop protection industry conducts farmer training on IPM and responsible product use. The CropLife International network has carried out many initiatives around the world to promote the responsible transport, storage, use and disposal of crop protection products. Several programs have been highly effective at providing training models that can be implemented in any region, such as:

- In India, a program which involved local NGOs reached over 120,000 farm families in 6 years, including women. The retention of facts and skills acquired in this training was exceptional. The successful approach could serve as a model for future projects.
- In Honduras, a public-private partnership with USAID reached 30,000 farmers where they were trained on good agricultural practices.
- In Ghana, Cote d'Ivoire, Nigeria and Cameroon, CropLife Africa Middle East entered into a partnership with the World Cocoa Foundation to train professional Spray Service Providers. It forms part of the World Cocoa Foundation’s African Cocoa Initiative. So far 50,000 farmers have been reached. Similar efforts are underway in Uganda, Zambia, and Kenya in collaboration with IFDC, USAID and World Bank.

4. Regulatory Capacity Building

CropLife International is committed to capacity-building of regulatory authorities by providing training on risk and use assessment best practices in developing countries. The industry encourages a continued collaborative approach with other stakeholders, such as the FAO, other appropriate UN bodies and non-governmental organizations, to also provide such training. CropLife International has been involved in capacity building exercises for many years in cooperation with IUPAC, USDA/FAS, COLEACP and other institutions. Topics covered include operator exposure, dietary risk assessment, human health and toxicity, environmental risk assessment and HHPs. Training has been coordinated in countries such as Brazil, China, India, South Korea, ASEAN, Chile, Costa Rica, Peru, Argentina, Ecuador, Uruguay, Burkina Faso, CILSS countries.

5. Raising Awareness of Counterfeit and Illegal Pesticides

Counterfeit and illegal pesticides are untested for safety. In practice, they may contain unapproved and unknown impurities, illegal formulations and have fraudulent or nonexistent guidelines for use. Because there is no responsible stewardship of these products, counterfeit pesticides can damage the environment, present an occupational health risk for farmers and destroy crops. Over the last 5 years, CropLife international has trained over 1,000 customs and police officers on how to detect counterfeit pesticides. This has resulted in the removal of an estimated 2000 tons of counterfeit and illegal pesticides by the relevant authorities.

6. Successful Removal of Obsolete Stocks

Disposal of obsolete stocks of crop protection products is a long-term global issue. Deterioration of stocks under poor storage conditions continues to the point of presenting a potential danger to nearby communities and to the local environment. During the last 20 years, industry has participated in over 25 multi-stakeholder projects in collaboration with over 30 organizations, including FAO, World Bank, PAN and WWF, which has led to the safe disposal of over 15,000 tons of obsolete crop protection products in developed and developing countries.