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<tr>
<th>Name</th>
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<tr>
<td>Mr. Mustafa Bagan</td>
<td>Turkey</td>
<td>17-Apr-15</td>
<td>Proposal for training certificates on use of HHPs</td>
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<tr>
<td>Ms. Meriel Watts</td>
<td>XTRA, New Zealand</td>
<td>18-Apr-15</td>
<td>Added paragraphs about farmers organisations and trade unions/agricultural workers; modified sections on private sector and civil society; added a section on academics and scientists; modifications of sections on “Taking action on HHPs” and “Gaps remaining and implications for the 2020 goal”; modification of section “Possible proposed next steps”</td>
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<tr>
<td>Ms. Sheila Logan</td>
<td>UNEP</td>
<td>22-Apr-15</td>
<td>Comments in section “Gaps remaining and implications for the 2020 goal”</td>
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<tr>
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<td>Egypt</td>
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<td>Ms. Samira Azzouei</td>
<td>Ministry of Environment, Morocco</td>
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<td>Mr. Emmanuel Odjam-Akumatey</td>
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<td>Mr. Ahmed Jaafari</td>
<td>SEEPOM Environment, Morocco</td>
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<td>Mr. Jerome Karimumuryango</td>
<td>Environment - Burundi</td>
<td>17-May-15</td>
<td>Proposed addition to the section “Gaps remaining and implications for the 2020 goal”</td>
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<td>Mr. Alemayehu Worke</td>
<td>PRRP, Ethiopia</td>
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<td>Mr. Gilbert Kuepouo</td>
<td>CREPD, Cameroon</td>
<td>19-May-15</td>
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<tr>
<td>Mr. Vijay Boodhoo</td>
<td>Mauritius</td>
<td>19-May-15</td>
<td>Proposal for individual stakeholder plans and priorities for HHPs till 2020</td>
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<tr>
<td>Ms. Angela Patricia Rivera Galvis</td>
<td>Colombia</td>
<td>26-May-15</td>
<td>Comment on Civil Society; additions to section “Possible proposed next steps”; additions to the table on existing initiatives</td>
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<tr>
<td>Mr. Silvani Mng’anya</td>
<td>ANCAP, Tanzania</td>
<td>28-May-15</td>
<td>Comments on inclusion of ANCAP and its role in the table on existing initiatives</td>
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<tr>
<td>Ms. Silvija Nora Kalnins</td>
<td>Latvia</td>
<td>29-May-15</td>
<td>Added Guidelines and the Special Programme Trust Fund to paragraph 8; additions to paragraph 10; Modified section “Taking action on HHPs”; modification on section “Possible proposed next steps”</td>
</tr>
<tr>
<td>Ms. Kimberly Cochran</td>
<td>US</td>
<td>29-May-15</td>
<td>Several comments related to the role of SAICM</td>
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<tr>
<td>Ms. Marthe Rahelimalala</td>
<td>Madagascar</td>
<td>Addition to section “Gaps remaining and implications for the 2020 goal” and to the table on existing initiatives.</td>
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<tr>
<td>Mr. Bernhard Johnen</td>
<td>Croplife</td>
<td>Reaffirming the role of industry as key stakeholder, proposed replace “hazard-based” with “risk-based” management issue, reaffirming importance of voluntary programs, highlighting emphasis on decision making based on scientific risk-assessments, paying particular attention to countries with developing regulatory systems.</td>
<td></td>
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<tr>
<td>Ms. Gabi Eingmann</td>
<td>Switzerland</td>
<td>Specific recommendation for improving the proposal. Specifically related to the link with SAICM OPS-GPA, the role of SAICM and of a leading country, to the link with SDGs, finally to funding.</td>
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<tr>
<td>Mr. Shailand Gunoo</td>
<td>Independent</td>
<td>Detailed comments and proposed modifications collected in a table referring to line section and line of the draft.</td>
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<tr>
<td>Mr. Omara Amuko</td>
<td>IUF</td>
<td>Comment on lack of reliable statistics, better documentation and workers’ education.</td>
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<td>Atty. Jonas R. Leones</td>
<td>Philippines</td>
<td>Specific recommendations for improving the proposal.</td>
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<tr>
<td>Ms. Fagamou Sy</td>
<td>Senegal</td>
<td>Comment on poor awareness of hazards and risks among pesticide retailers and challenges in identification of pesticides due to non-standard dissemination.</td>
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<tr>
<td>Dr. Jasim Abdulazeez Humadi</td>
<td>Iraq</td>
<td>Comment to include support for adoption of a unified international classification, coordination with CODEX Alimentarius commission, WHO and BR S conventions.</td>
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<tr>
<td>Mr. Luiz de Andrade Filho</td>
<td>Brazil</td>
<td>Comments on individual stakeholders plans and priorities, gaps and objectives.</td>
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COMMENTS FROM STAKEHOLDER ON THE 17 APRIL 2015 DRAFT

Proposal for addressing Highly Hazardous Pesticides under SAICM
- for consultation with SAICM stakeholders –

Comment and addition by Mr. Bernhard Johen, CropLife
“For reasoning see ‘Overarching CropLife Comments provide(d) with cover letter.”

Preamble
SAICM is a unique global policy framework to support efforts to achieve the Johannesburg Plan of Action and the 2020 goal and aims to coordinate, catalyse and facilitate the process. It is a voluntary, non-legally binding instrument with multi-stakeholder and multi-sectorial character, which gives equal opportunity to all stakeholders including industry and other non-governmental organizations. The scope covers environmental, economic, social, health and labour aspects of chemical safety.

The objectives of SAICM as stated in the Overarching Policy Statement are:
- Risk reduction
- Knowledge and information
- Governance
- Capacity building and technical cooperation
- Prohibition of illegal international trade.

One of the key concepts that runs through these objectives is risk based chemicals management. In order to achieve the goal of minimizing impact of chemicals, i.e. risk reduction, attention to all five objectives is required, but special consideration needs to be given to risk assessment capacity building in countries with less developed regulatory systems and infrastructure.

Introduction
1. At the second meeting of the SAICM Open-ended Working Group (OEWG2), participants discussed the issue of highly hazardous pesticides (HHPs) and invited ‘the FAO, UNEP and WHO to facilitate a multi-stakeholder process to develop a proposal for the fourth session of the International Conference on Chemicals Management (ICCM4) (submitted well in advance) taking into account the resolutions from the SAICM Regional Meetings in the Africa and LAC regions, the proposal from the African region and the FAO non-paper presented at the OEWG2, as well as relevant text from other regional meeting reports and relevant information documents to the OEWG2 (Annex VI, SAICM/OEWG.2/13).

2. OEWG2 further requested a process of consultations by electronic means among interested stakeholders on highly hazardous pesticides.

Comment on below by Ms. Kimberly Cochran, USA

Comment and addition by Mr. Bernhard Johen, CropLife
3. This paper sets out a proposal for action to address HHPs for consideration of SAICM stakeholders.

“General comment: This proposal should more clearly articulate how a SAICM initiative would complement existing activities.”

The proposed plan builds extensively on existing activities, tools, mechanisms and frameworks that contribute to the attainment of the SAICM 2020 goals and is within the context of the SAICM Overarching Policy Strategy for risk reduction, knowledge and information sharing, capacity building and technical cooperation and the prohibition of illegal international transfer through risk-based chemical management. The plan also defines roles and actions for all SAICM stakeholders so that collaboration and active participation will achieve greater results. The actions that require new resources are clearly identified to so that the implications of an agreement to implement them can be clearly understood.

“Please be aware that there are no new resources within SAICM. Participants should be able to secure funding through other mechanisms.”

4. In order to inform the further development of this proposal and to identify a network of stakeholders that wish to contribute to the initiative in moving forward, input is requested from SAICM stakeholders by 18 May 2015. Input should be sent to saicm.chemicals@unep.org. In particular, input is requested from SAICM stakeholders on the overall approach set out in the proposal, on individual stakeholder plans and priorities for HHPs between now and 2020 and on the gaps identified in the proposal.

5. The FAO, UNEP and WHO have planned the following consultation steps for the development of the proposal.
(a) The proposal will be released 17 April 2015 via the following means:

(i) Sent to the ICCM4 Bureau for consideration at its face to face meeting scheduled on 30 April – 1 May 2015.

(ii) Posted on the SAICM web-site and sent to SAICM focal points for input via e-mail.

(b) A side-event to be hosted at the Basel, Rotterdam and Stockholm Convention COPs to seek input on the proposal, to discuss overall needs and challenges in moving forward and to hear from SAICM stakeholders what they may contribute to the initiative.

(c) Proposal finalized for ICCM4 consideration.

Background

6. The paper builds upon a sequence of discussions, resolutions, proposals and papers that have featured in ICCM3, SAICM Regional Meetings and the OEWG2. Of particular relevance to this discussion are the following events and their associated reports:

(a) SAICM/ICCM.3/24: Report of the International Conference on Chemicals Management on the work of its third session, paras 194, 195

(b) SAICM/RM/Afr.5/7/SAICM Regional Meeting: Report of the fifth African regional meeting on the Strategic Approach to International Chemicals Management (Resolution C. Highly hazardous pesticides (HHPs)

(c) SAICM/RM/AP.4/7: Report of the fourth Asia-Pacific regional meeting on the Strategic Approach to International Chemicals Management, Paras 41, 42

(d) SAICM/RM/CEE.5/9: Report of the fifth Central and Eastern European regional meeting on the Strategic Approach to International Chemicals Management, paras 46, 47 and Annex 2


(f) SAICM/OEWG.2/10 “Information note on highly hazardous pesticides prepared by the Food and Agriculture Organization of the United Nations”.

(g) SAICM/OEWG.2/INF/5: Analysis by the Inter-Organization Programme for the Sound Management of Chemicals of efforts to implement the Global Plan of Action of the Strategic Approach to International Chemicals Management and key issue papers

(h) SAICM/OEWG.2/INF/21 “Paper by CropLife International on its approach to managing highly hazardous pesticides”

(i) SAICM/OEWG.2/INF/24 “Submission from the Pesticides Action Network and the International POPs Elimination Network on highly hazardous pesticides”,

(j) Addressing Highly Hazardous Pesticides – next steps for SAICM – Non-Paper prepared by the United Nations Food and Agriculture Organization (FAO), 16 December 2014 (OEWG2).

Comment and edit by Mr. Bernhard Johen, Croplife

7. A resolution was proposed at ICCM3 calling for concerted action on HHPs, recognizing the hazards presented by HHPs in use and the opportunity offered by acting to remove them from use. The draft resolution was not approved at that time because it was proposed too late for many delegations to consult with their stakeholders. Nevertheless, it received broad support during the Conference. All the SAICM Regional Meetings held since ICCM3 have discussed HHPs and agreed that further action is needed. The Regional Meetings for Africa and for Latin America and the Caribbean passed specific resolutions on HHPs. The Asia-Pacific region invited countries to perform surveys of highly hazardous pesticides and encouraged information exchange. Calls for action to eliminate risks from HHPs have also come from the FAO Council and the newly approved International Code of Conduct on Pesticide Management. There may also be a close link between the Rotterdam Convention listing of Severely Hazardous Pesticide Formulations and efforts to identify and reduce risks from HHPs.

“‘is’ is not necessarily always the case.”

“SAICM efforts might be better directed towards encouraging compliance with the Stockholm and Rotterdam conventions.”
Considerations
Comment on below point by Ms. Angela Patricia Rivera Galvis. Colombia
Edits by Ms. Silvija Nora Kalnins. Latvia
Comment and edit by Mr. Bernhard Johen, Croplife

8. The broad interest and support for action on HHPs within the SAICM community is illustrated in the above referenced SAICM meeting documents. There is a call from many SAICM stakeholders for action, guidance and support to address HHPs. SAICM is ideally placed at this point in time with its multi-sectoral and multi-stakeholder approach to launch a collaborative and participatory initiative to facilitate individual efforts by stakeholders to phase out HHPs. Such an initiative could bring about a significant reduction of risks from a particularly hazardous group of chemicals in the 2015-2020 period.

“We agree with the purpose of the initiative being the HHPs identification and achievement of proper agreements to phase these pesticides out.”

9. FAO, working with WHO through the Joint Meeting on Pesticide Management (JMPM) in which international experts as well as representatives of other IGOs, the pesticide industry and NGOs participate, has proposed additional criteria that define HHPs as well as agreed a definition of HHPs in the International Code of Conduct on Pesticide Management. Article 7.5 of the Code states that the prohibition of the importation, distribution, sale and purchase of highly hazardous pesticides may be considered if, based on risk assessment, risk mitigation measures or good marketing practices are insufficient to ensure that the product can be handled without unacceptable risk to humans and the environment. makes concise recommendation on eliminating unacceptable risks from HHPs.

“These criteria are not accepted; in fact the FAO Committee on Agriculture has rejected them from incorporation into the Code of Conduct on Pesticide Management.”

“It is intellectually more honest to cite the actual article rather than shorthand it in a questionable way.”

Other articles in the Code also recommend actions aimed at assessing and reducing risks from pesticides, for example:

“More information on additional articles give a better and more balanced view of what the Code stipulates.”

- Article 3.6 Pesticides whose handling and application require the use of personal protective equipment that is uncomfortable, expensive or not readily available should be avoided, especially in the case of small-scale users and farm workers in hot climates; and
- Article 5.2.4 [Pesticide industry should] make every effort to reduce risks from pesticides by making less toxic formulations available.

“§5.2.4 has 7 sub-articles, it makes no sense to just refer to 5.2.4.1”

- Article 6.1.5 [Governments should] conduct risk evaluations and make risk management decisions based on all the relevant data and in formation, as part of the pesticide registration process.
- Article 6.2.1 [Pesticide industry should] provide an objective assessment together with the necessary supporting data on each product, including sufficient data to support risk assessment and to allow risk management decisions to be made.

8. As many LMICs lack the capability to enforce the decisions of the Stockholm, Montréal and Rotterdam Conventions, Among the IOMC and participating organizations1 are helping substantial work is already being carried out to reduce risks from pesticides by providing. Actions include the following:

“We believe that this lack of capability/resources need to be highlighted, if improvements are to be achieved.”

- IOMC Toolbox for Decision Making in Chemicals Management
Includes a module on pesticide management schemes (with a toolkit to support evaluation of pesticide for registration purposes under development).
- The International Code of Conduct on Pesticide Management
The framework on pesticide management for all public and private entities engaged in, or associated with production, regulation and management of pesticides. The updated Code of Conduct on Pesticide Management was approved by the FAO Conference in June 2013, and was recognized by the WHO Executive Board in January 2014. The Code serves as a point of reference in relation to sound pesticide life cycle management practices, in particular for government authorities and the pesticide industry. The Code of

1 Particularly FAO, ILO, UNEP, WHO, World Bank, OECD
Conduct is supported by additional technical guidelines, of which some examples are listed below. Specific reference is made to HHPs in the new Code and a technical guideline is under development.

**Guidelines for Legislation on the Control of Pesticides, 1989**

**Designing National Pesticide Legislation – FAO Legislative Study, 2007**

These guidelines are intended for Governments wishing to develop, review, update or strengthen national legislation for the control of pesticides.

**Guidelines on Compliance and Enforcement of a Pesticide Regulatory Programme**

This guidance document is designed to collect in one place and provide a reasonably comprehensive source of compliance and enforcement guidance to support implementation of the International Code of Conduct.

- **FAO/WHO Panel of Experts on Pesticide Management (JMPM)**
  Advises on matters pertaining to pesticide regulation, management and use, and alerts to new developments, problems or issues that otherwise merit attention. In particular, the JMPM advises FAO and WHO on the implementation of the International Code of Conduct on Pesticides Management. The JMPM combines the FAO Panel of Experts on Pesticide Management and the WHO Panel of Experts on Vector Biology and Control. The JMPM has agreed criteria for defining HHPs.

  “Deleted as these criteria have not been agreed, even by the governing body, the CoAg.”

- **FAO, WHO, and OECD all promote integrated pest (IPM) and integrated vector management (IVM) as a tool to achieve pest management objectives, to combat pesticide resistance, to reduce risks from and reliance on HHPs and other pesticides.**

  “Reducing the use of HHPs is not the aim of IPM and IVM. In many instances, the implementation of an integrated approach requires the responsible use of pesticides that might qualify as potential HHPs on hazard, but not on risk grounds.”

- **WHO Recommended Classification of Pesticides by Hazard**
  Lists recommended hazard classifications for pesticides, based mainly on acute risk to human health (adjusted in some cases for severe hazards other than acute oral or dermal toxicity). The GHS Acute Toxicity Hazard Categories are also presented. It is widely used by pesticide regulators in developing countries to distinguish between the more and less hazardous pesticides, and to guide the placing of hazard warnings on pesticide labels.

- **WHO Pesticide Evaluation Scheme (“WHOPES”)**
  WHOPES promotes and coordinates the testing and evaluation of pesticides for public health through the participation of governments, research institutions, and manufacturers of pesticides and pesticide application equipment. WHOPES recommendations guide the procurement of public health pesticides (including insecticide-treated nets) by governments and aid agencies for vector control.

- **Joint Meeting on Pesticides Residues (JMPR)**
  This joint WHO and FAO activity provides advice on acceptable levels of pesticide residues in food. Toxicological data is reviewed to establish health-based guidance values for pesticides. Pesticides residue data is reviewed to determine Maximum Residue Levels (MRLs). These outputs form the basis of Codex MRLs which are fundamental to international trade in food and agricultural commodities.

- **Joint Meeting on Pesticides Specifications (JMPS)**
  Recommends technical specifications for pesticides that are used in regulatory processes to determine the quality of pesticides and ensure that traded products are the same as those registered; specifications also facilitate registration of ‘equivalent’ products from different manufacturers using the ‘equivalence procedure’. Appropriate use of specifications can also help to control trade in counterfeit, unregistered, adulterated or otherwise non-compliant pesticides.

- **OECD Working Group on Pesticides (WGP)**
  As part of its work on risk reduction, the WGP has established an Expert Group on Integrated Pest Management. Its objectives are to facilitate coordination and information exchange about IPM (especially thanks to the “IPM Hub” hosted on the OECD web site), promote and develop policies in favour of IPM adoption and implementation, develop indicators of IPM adoption and impact, and facilitate awareness raising about IPM among the public and food chain operators.

- **The SAICM Quick Start Programme Trust Fund** is funding projects on Reducing Risks of Highly Hazardous Pesticides (HHPs) in 2 countries, with international expertise support provided by FAO.
• The **Special Programme Trust Fund**, which is expected to be established in 2015 and aims at supporting countries in strengthening national authorities and capacity to regulate chemicals, including pesticides, and thereby reduce the risks arising from their use.

**Comment on above and edit below by Ms. Kimberly Cochran, USA**

9. More effective implementation of existing chemical management mechanisms will lead to better control of HHPs. “We agree.”

The International Code of Conduct on Pesticide Management provides a comprehensive framework for pesticide life cycle management and makes recommendations for action on the part of all stakeholders.

10. The chemicals and waste conventions contribute significantly to pesticide risk reduction:

“This list of conventions raises the concern that this proposal duplicates international efforts already in existence. This proposal should clearly articulate the need for action by SAICM in light of these existing efforts to reduce the risks from hazardous pesticides.”

**Edits by Ms. Sheila Logan, UNEP:**

- The **Rotterdam Convention** supports countries in making informed decisions about their import and use of certain particularly hazardous pesticides and provides mechanisms for countries to report adverse impacts from certain pesticide formulations in use and also to report on regulatory actions that have been taken to prohibit or severely restrict pesticides as a result of their adverse impacts.

- The **Stockholm Convention** supports countries to eliminate the production and use of persistent organic pollutant pesticides, 16 of the chemicals currently addressed by the Convention are pesticides.

- The **Basel Convention** aims at reducing hazardous waste generation and promoting the environmentally sound management of hazardous wastes, including waste from pesticides.

- The **Montreal Protocol** aims to eliminate the production and use of ozone depleting substances, one of which (methyl bromide) is a pesticide

- The **Minamata Convention** aims to eliminate the use of mercury in pesticides, biocides and topical antiseptics.

- The **Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)** helps countries to classify chemicals that present both acute and long term hazards to health or the environment more precisely and label them more clearly. Application of GHS to pesticides helps to inform users better on their hazards and thus make better informed choices.
Farmers organisations and networks involved in ecosystem approaches to pest management

11. Women and men farmers are the ultimate managers of pests in agriculture and the main users of pesticides; they are the ‘end users’ of the SAICM approach on HHPs although all stakeholders are the beneficiaries of it. There are extensive networks of farmers nationally, regionally and internationally with deep and broad knowledge of agroecological and organic farming, whose years of experience, both in farming without HHPs and in assisting other farmers, could help inform stakeholders’ efforts to phase out HHPs. This is best carried out through a farmer-to-farmer sharing and learning process via a community of practice, study tours to farmers, YouTube interviews, social media apps, etc.

Trade Unions and agricultural workers organisations

12. Agricultural workers and pesticide sprayers are the exposed to HHPs daily in the course of their work without any protection or information about the hazards of their pesticides. As a group that is exposed to these pesticides, agricultural workers organisations have a key role to play in these discussions. There are trade unions, organisations and extensive networks of agricultural workers groups at the national, regional and international levels that have campaigns for safer and healthier environment and safer working conditions. Their efforts to create awareness, stop the exposure of workers to HHPs and their work to remove such pesticides from workers’ exposure are important areas for actions on HHPs.

Private sector stakeholders

13. The pesticide industry plays an important role in manufacturing and formulating pesticides, presenting them to national regulatory authorities for registration and advertising pesticides. Other companies import, distribute and sell pesticides. At each step of the production, distribution and sale chain, companies can make decisions about which products will be made available. Such decisions can also influence the formulation of pesticide, size and type of packaging, who the product is sold by and to whom.

14. CropLife International, the organization representing the research based pesticide producers, has made a commitment to act with its members and other partners to identify, assess and mitigate risks from pesticides that meet a modified the set of criteria for HHPs set out in the International Code of Conduct on Pesticide Management.

“This sentence reflects the feedback we receive from these countries.”

“Insight comment: In cases in which producers identify new adverse effects or hazards, regarding to the environmental performance of the pesticides produced, should be informed to the authorities in charge, in order to conduct further risk assessment on the before approved uses.

The abovementioned comment responds to some situations, particularly in developing countries, where producers are more likely to know this information before the authorities, due to the reduced capacity to follow up on these pesticides.”

“We suggest to:
- Encourage the pesticide industry (production chain, distribution and sales) to have a greater commitment to the management and handling of containers and waste of their products on the market.
- Encourage also to research new molecules that could be less harmful to health and the environment.
- Encourage the industry to recognize the products distributed globally as a HPPs and that should be eliminated globally with your support.”

15. Other private sector organizations should be invited to contribute to risk reduction efforts. These should include owners and operators of primary agricultural production facilities (plantations, greenhouses, farms etc), providers of biological controls and other non-chemical pest management inputs, as well as secondary food, fibre and renewable raw material processors, and retailers and standards organizations who determine protocols for primary
producers that include instructions related to pest and pesticide management and who aim at a phase out of highly hazardous pesticides. These should include AgroCare, owners and operators of primary agricultural production facilities (plantations, greenhouses, farms etc.), as well as secondary food processors who determine protocols for growers.

“As CropLife is mentioned by name, AgroCare, who have made their position also clear, should be named in this context.”

“Our re-wording better reflects contractual agreements in the foodchain”

Civil Society

16. NGOs within the SAICM community have highlighted the need for action on HHPs in order to protect the health of pesticide users, rural communities that are exposed to pesticides in their living and working environments, consumers of food carrying pesticide residues and the environment including biodiversity that is vital to sustainable agricultural production.

“It should be mentioned that in developing countries there are very few NGOs working or in capacity of conducting activities for evaluating and monitoring the performance and use of pesticides at the local level. This proposal also seeks to encourages governments, companies and academia to develop and strengthen this type of NGOs.”

17. Among these NGOs, The Pesticide Action Network (PAN) and the International POPs Elimination Network (IPEN) propose that HHPs should be explicitly listed to better inform pesticide regulators and users; that alternatives to HHPs, particularly nonchemical ecosystem approaches to pest management, are identified and information about them disseminated; that regulator capacity in developing countries is strengthened to prioritize action to be taken to replace HHPs; and that farmers are encouraged and supported to replace HHPs with sustainable, non chemical pest management strategies.

“It was also proposed that a Global Alliance to Eliminate HHPs been formed! I am not sure whether there is a buy-in of this idea by UNEP and WHO?”

Academics and Scientist

18. Academics and scientists have highlighted the need to phase out HHPs, and play an important role in providing information about both the impacts of HHPs and effective ecosystem approaches to pest management.

Governments Taking action on HHPs

19. Pesticide regulators, plant protection and public health pest management specialists, farmers and other pesticide users should be given verified information on effective, safe and scalable confidence to know that in most cases there are alternatives to HHPs, whose effectiveness has been demonstrated to enable them to make. Chemicals that have a market might be vigorously defended by the companies that produce and sell them. It is therefore important for regulators to take objective and informed decisions.

“This is about providing evidences about the effectiveness of alternatives, not about some ill-defined ‘confidence’.”

“We have removed this and re-phrased the sentence, as the original text is an insult to our reputable industry and its working.”

20. The first important step is to relook at the role and current levels of pesticide use. There is broad support internationally for reducing pesticide use and assisting farmers to replace pesticides with ecosystem approaches to pest management. The 2012 Stockholm Convention Conference of Parties recommended that countries give priority to ecosystem approaches to pest management when replacing endosulfan. The International Code of Conduct on Pesticide Management gives special focus to Integrate Pest Management as a means to reduce reliance on pesticides and their associated risks, and the Code’s Guidance on Pest and Pesticide Management Policy Development describes IPM as an ecosystem approach in which pesticides are used if other nonchemical approaches are not available or fail. Two UN Special Rapporteurs on the Right to Food have concluded that there must be a shift to more environmentally sustainable methods of production, such as agroecology in which, again, pesticides are used as a last resort. The 2009 International Assessment of Agricultural Knowledge, Science and Technology for Development – IAASTD – (UNDP, FAO, UNEP, UNESCO, World Bank, WHO, GEF), and recently the Director General of FAO (Pairs, 2015), acknowledged that the
way food is being produced must change, both lending support to agroecology. It therefore makes sense that when countries are phasing out HHPs they look first to ecosystem approaches to pest management as their replacement.

**Comment on below point by Ms. Kimberly Cochran, USA**

21. The **first** important step in taking action to reduce risks from HHPs rests with the **Governments** by adopting the necessary legislation and establishing appropriate pesticide regulatory authority at the national level. These authorities must be empowered to make and implement informed decisions about pest management policies, and about which pesticides or other pest control measures may be used in their countries and for what purposes, and about the availability and effectiveness of nonchemical alternatives.

“It is the **key** point”

“Surely pest management policies and pest control go beyond pesticides.”

It should be noted that most pesticide regulators and users are in the agriculture and health sectors which are not well represented in the SAICM forum, therefore SAICM is strongly encouraged to ensure that these national experts are invited to participate in ICCM4.

“As this paper will be available prior to ICCM4, it provide a good vehicle to encourage better representation at ICCM 4 of the agricultural sector.”

“We question whether this paragraph conflicts with the previous statement that SAICM was well positioned to take action to reduce the risks associated with the use of HHPs. If this is the case, we recommend that SAICM seek to engage these stakeholders more proactively.”

22. Capacity among pesticide regulators in developing countries is severely limited. Of 109 developing countries, 97% have fewer than 6 people working in pesticide registration and regulation, and of these 77% have no more than 2 staff dealing with pesticide registration. Almost no developing countries and only a few countries with economies in transition have analytical laboratories that can fully analyse pesticide formulations, including manufacturing impurities, in order to determine the quality of pesticides in use. Despite these severe limitations, all regulators state the desire to make better informed decisions about pesticides, including which ones should be removed from use because of the risks they present. There is a similar strong interest in being able to identify viable alternatives to HHPs that continue to be widely used. Having Government owned analytical laboratories that can analyse pesticide formulations, including manufacturing impurities, in order to determine the quality of pesticides in use is not common practice in developed countries as this is too costly and not needed for effective enforcement. However, all national authorities responsible for enforcement of pesticide legislation need to have access to laboratories for verification of the specification of pesticides. These laboratories should use robust analytical methods with known analytical performance characteristics and should wherever possible take part in intercalibration exercises involving several laboratories so as to ensure as far as possible the comparability of results. This requirement could be met by ensuring access to analytical capacity available at either national or regional level. All regulators state the desire to make better informed decisions about pesticides, including which ones should be removed from use because of the risks they present. There is a similar strong interest in being able to identify viable alternatives to HHPs that continue to be widely used.

23. The need for action on HHPs is strongly supported by WHO data on pesticide impacts on health, according to WHO, highly hazardous pesticides may have acute and/or chronic toxic effects, and pose particular risk to children. Their widespread use has been associated with some caused health problems and fatalities in many parts of the world, often as a result of occupational exposure and accidental or intentional poisonings.

“This is probably a more defensible wording than the origin alk text of ‘caused’ and ‘often’.”

Available data are too limited to estimate the global health impacts of pesticides, however the global impact of self-poisoning (suicides) from preventable pesticide ingestion has however been estimated to amount to 186,000 deaths and 4,420,000 Disability Adjusted Life Years (DALYs) in 2002.

“Whilst self-poisoning using pesticides is regrettable, it should not be a reason for denying bona fide farmers access to much needed crop protection tools. Instead, efforts should be coordinated to do something about the problem of self-poisoning on the basis of the WHO suicide prevention plan. Industry stands ready to cooperate or is already cooperating.”

24. FAO has surveyed national actions relating to pesticides that would be defined as HHPs under the FAO/WHO criteria and found that among a sample of 30 African, Asian and Caribbean countries, all had banned all POPs pesticides, 11 countries had taken regulatory action to ban or restrict pesticide listed in Annex III of the Rotterdam Convention and 26 countries had taken regulatory action against other pesticides, though many countries lack the ability to enforce these decisions.

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25. UNEP’s analysis of the costs of inaction on the sound management of chemicals also supports the need for action to reduce risks from pesticides in use. The UNEP Report has estimated that the health costs associated with exposure of the entire farming population to pesticides in Sub-Saharan Africa in the period between 2005-2020/ for 15 years (2005-2020)/ without any preventive and risk reduction actions would amount to at least USD 97 billion, greater than the level of total Overseas Development Assistance minus HIV/AIDS. These estimates are based on an extrapolation from worst-case data on 250 farmers in East Africa in 2006, overestimate the seasonal use of pesticides in the area and at variance with real data collected from the region.

“I thought proposed to ask them for an update to them to request an update how costs did increase as they must have data from 2006 to 2013 at least.”

“Whilst there is substantial doubt about the estimated cost, the amount is not an impressive number, if expressed in % of the sub-Saharan GDP assessed by the World Bank. In addition, any such cost should be compared to the benefit, which is missing in this case.”

Gaps remaining and implications for the 2020 goal

Edits by Ms. Meriel Watts, XTRA, New Zealand
Edits by Mr. Alemayehu Worke, Pesticide Risk Reduction Programme, Ethiopia
Comments and edits by Ms. Angela Patricia Rivera Galvis, Colombia:
Edits by Ms. Silvija Nora Kalnins, Latvia
Comment on below by Ms. Kimberly Cochran, USA
Edits by Ms. Marthe Rahelimala, Madagascar
Comment and edits by Mr. Bernhard Johen, Croplife

26. The remaining gaps include (identified in SAICM/OEWG.2/INF/5):

(a) Awareness of ecosystem approaches to pest management is very low at the regulatory and policy level, and this needs to be urgently addressed. Regulators and other decision makers in developing and transition countries, such as those participating in the University of Cape Town’s Pesticide Risk Management course and in UNEP’s BRS webinars, are specifically asking for training, advice and practical guidance on how to use non-chemical alternatives for specific crop/pest-disease-weed situations.

(b) Some countries still lack an effective regulatory system for pesticides, and this needs to be urgently addressed if such a system is to be in place by 2020.

“The proposal should define “the effective regulatory system for pesticides” in order to identify goals and indicators of progress.

This regulatory regimen should consider and articulate obligations and liabilities to each actor who handles pesticides throughout their cycle of life, including when they are considered waste.”

“We agree that there is a real need in developing countries for improved regulation and management of pesticides.”

(c) Limited regulatory and enforcement capacity means that HHPs continue to be available, widely used and may also be inappropriately used (e.g. on crops for which they are not permitted, at higher doses or frequencies of application than permitted, applying HHPs without safety gears etc.).

(d) Lack of available mechanisms and safe practices of disposal of used bottles and packaging of pesticides and illegal pesticides found at national level.

(e) There is a significant lack of extension on appropriate ecosystem pest management; however, in most countries there are groups of farmers, and often academicians, with expertise in ecosystem approaches to pest management that can provide valuable assistance to other farmers and researchers. Their efforts need to be assisted so that more farmers can be reached, more rapidly. The priority is collecting and transforming existing information and experiences into formats for practical guidance and allowing more people to put these into practice and adapt to their own situations.

(f) There will be a need for further research on appropriate ecosystem pest management to augment that collected under point (d) above.

(g) Poor awareness among users about the hazards and risks of HHP use results in continued exposure and additional or cumulative adverse impacts on health and environment. Lack of information to women farmers and agricultural workers even though they are pesticide applicators and have a double and triple burden as farmers/workers and responsible for work at home as home makers and mothers. Often the lack of government programs (especially developing countries) to provide information and technical assistance to users of HPPs, apart from the actions

developed by manufacturers and distributors of those products. Limited capacity for developing countries to face HHPs problems.

(h) Awareness of alternatives to HHPs is still low, especially at local levels (e.g. farms) where such alternatives may not be available, and especially for ecosystem approaches. The role of private sector producers, importers, distributors and vendors in bringing forward innovative solutions, making less toxic formulations available and promoting responsible use of all pesticides is crucial.

“Phasing out is not the solution. The solution is innovation and mitigation as expressed in our re-wording”

(i) Weak implementation of the International Code of Conduct on Pesticide Management, Rotterdam and Stockholm conventions and national pesticide legislations in many countries and by some key stakeholders, such as governments, pesticide vendors and users due to poor education and information networks.

“We believe that the failure of governments regarding implementation of the Code needs to mentioned, if this situation is going to be rectified.”

(j) Absence of associated guidelines that support the implementation of national pesticide legislation and international pesticide related conventions

(k) Absence of requirements and criteria for bio-pesticide registration and absence or limited capacity on dossier evaluation and registration of the same pesticides and chemical pesticides

(l) Absence or limited use of IPM-FFS initiatives on crop pest combinations that widely consume some HHPs including endosulfan

(m) Participation of the agriculture sector in the SAICM process has been relatively limited to date, while in many developing countries, agriculture is a (if not the) major user of chemicals. Without this participation, proposed actions will not be recognized by the sector and may be inappropriate.

“This amendment should be self-evident from our previous comments on the participation of the Ag sector.”

Comments on the two points below by Ms. Sheila Logan, UNEP:

(n) How can better management and risk reduction of HHPs be more clearly linked to the 2020 goal and requirements of the FAO Council, FAO Committee on Agriculture and International Code of Conduct? Should clear targets be set in relation to identification, regulation, risk assessment and risk management reductions in the use of HHPs?

“On the other hand, governments should assess potential taxes or economic contributions for ecological management of HPPs in order to discourage their use.”

“Yes”

“Not sure this is a ‘gap’. Perhaps the gap is identifying how sound management of HHPs can be linked?”

“This proposal does not set out clear goals, nor does it differentiate those goals from the activities of other MEAs.”

“The amendments reflect that the SAICM OPS, the FAO CoAg and the Code of Conduct have risk assessment as the basis for any action.”

(o) The relative cost-effectiveness and availability to growers of many HHPs Economic factors encourage continued and expanded use of HHPs because they are cheaper, sometimes subsidized or even distributed without cost. In addition, they can leak without authorization between sectors (e.g. public health to agriculture, cotton to vegetables, etc.). Such factors need to be reviewed to manage risk-reduction of discourage HHP use.

“This needs reformulated as a gap, or should be under a different chapeau.”

“Our change to this paragraph makes is a neutral statement and eliminates any unnecessary and unjustified side swipe.”

(p) Absence of or very limited capacity to monitor the health and environmental impacts of pesticides. For example, few developing countries have active poison control centres, incident reporting mechanisms for pesticide poisonings or any environmental monitoring of pesticide movements and impacts. As a result, the extent of pesticide poisoning world-wide is largely unknown. There should be a vastly scaled up effort to monitor the extent of both acute and chronic effects. Useful experiences exist in capacity building for farmers, community groups and government agencies to monitor health and ecotox exposure and impacts. These experiences can be scale up with modest funds for systematising the methodologies, analysis and results into accessible formats for others to use and share results.

(q) Absence of or very limited collaboration/cooperation among Health/Agriculture/Stocklife/Environment Sectors at national level in promoting or/and undertaking the management of HHPs hazards and/or risks on environment and human health”.

Addition by Mr. Jerome Karimumuryango, Environment-Burundi:
Absence of or very limited collaboration/cooperation among Health/Agriculture/Stocklife/Environment Sectors at national level in promoting or/and undertaking the management of HHPs hazards and/or risks on environment and human health.

The use of pesticides for suicide and self-harm remains a significant public health problem in many regions, and this is excluded from the scope of the Rotterdam Convention because it is classified as “intentional misuse”. This limitation does not apply to the Code of Conduct or to SAICM. The use of pesticides for illegally killing wildlife, fish and domestic animals is still significant in some countries which leaves local communities and the environment contamination with HHPs. The decision to stop this deadly practice and attention to phasing out the relevant HHPs could vastly improve this situation. This limitation does not apply to the Code of Conduct or to SAICM.

The Code of Conduct and SAICM are silent on the subject of ‘intentional misuse’, such as suicide. The fact that it is not specifically excluded does not mean that it is included.

Possible proposed next steps

27. SAICM stakeholders should give recognition to the work that is already being done to raise awareness, inform and guide pesticide regulators, industry, civil society and other stakeholders on the identification and elimination of unacceptable risks, replacement and phase out of HHPs. Next steps should aim to further engage inform the SAICM stakeholder community on existing mechanisms and processes, and invite them to participate in these processes, such as:

• the FAO/WHO JMPM, regional pesticide regulatory systems,
• the initiatives of the Pesticide Action Network (PAN) and (International POPs Elimination Network) IPEN at the international, regional, and national level, and local at regional and national level to raise awareness and educate policy makers, farmers and communities on pesticide risks and alternative agroecological approaches to pest management, and their proposal to SAICM as detailed in document OEWG2_INF24 and summarized in paragraph 15 above

“Should this PAN initiative not be an FAO responsibility?”

• the proposal of CLI as detailed in document OEWG2_INF21 which can be summarized as consisting of a phase to identify potential HHPs using criteria developed on the basis of the definition of HHPs in the Code of Conduct, a phase to assess the actual risk (rather than purely hazard) in use, and a phase of risk management including risk mitigation and regulatory action, if the risk assessed cannot be managed, and summarized in paragraph 12 above.

“We believe that a short description of the CropLife proposal is indicated to ensure that the reader can appreciate that the CropLife proposal embraces risk (rather than hazard) assessment as is required under SAICM and the Code of Conduct.”

with the objective of strengthening them, identifying possible funding sources for scale up, enhancing collaboration and efficiency as well as expanding their scope to accelerating action on HHPs/ in one hand and promote non chemicals pesticides or ecological friendly pesticides in the other hand/ through building regional and national capacity in risk assessment to effectively reduce risks./

28. It will be important for the SAICM community and process to ensure that activities carried out under the SAICM banner demonstrate coherence with agreed objectives, visibility and accountability on the part of the delivering organization and quality of deliverables. In support of this:

“We agree with the need for coherence, but SAICM does not have the authority for the other actions listed.”

• The definition contained in the International Code of Conduct on Pesticide Management which was negotiated through the FAO Conference by 193 Member Countries and was also endorsed by the WHO Governing Council, should be applied as the basis for defining “highly hazardous pesticide”;

“The FAO definition indicates that a pesticide can be considered a HHP if its use in a specific country under conditions in that country lead to environmental or health impacts.”
The criteria for HHPs that were developed by the FAO/WHO independent expert panels meeting as JMPM should provide the framework for identifying HHPs; and

“These criteria have not been accepted by key stakeholders in pesticide management. In fact, they have been excluded by the FAO Committee on agriculture from the Code of Conduct and replaced by a rather more general definition, which CropLife has used to define criteria for the identification only of HHPs.”

The Guidance document on HHPs currently under advanced development through the FAO/WHO independent expert panels meeting as JMPM, should be used to guide actions undertaken by SAICM stakeholders to address HHPs. Once agreed by consensus of all stakeholders, the Guideline will should be published as an official document of FAO and WHO during 2015

“As the Code of Conduct is a consensus document and the management of HHPs is covered in the Code it is crucial that this consensus extend to this guideline.”

29. The broad objectives of a SAICM HHPs initiative could be aligned with recommendation of the 131st Session of the Council of FAO, in which the Council endorsed SAICM and recognized FAO’s role in SAICM implementation through activities on risk reduction, which could include the progressive ban of highly hazardous pesticides and promoting good agricultural practices.

“Our understanding is that the FAO did not adopt a progressive ban, but suggested that a progressive ban could be included as a priority. We believe that this paragraph is more conclusive than what was actually decided and more discussion is needed on the idea of a progressive ban. Furthermore, SAICM does not have the authority to enforce a ban of HHPs.”

30. The proposed specific objectives of a global SAICM HHP initiative could include:

“It seems that many of these objectives are more appropriate for specific SAICM stakeholders, and it is not clear how they could be achieved. For example, (comments inline)”

(a) Support governments in the development and adoption of an effective regulatory system for pesticides, including establishing regulatory and enforcement authorities at national level, that also addresses HHPs.

(b) To raise the awareness of government authorities and regulators, farmers, private sector, consumers, workers, trade unions and health-care providers about the risks of highly hazardous pesticides and the availability of safer alternatives; and the desirability of transitioning to ecosystem approaches to pest management; while preserving food security;

(c) To facilitate the identification of HHPs in use through cross reference to the Code of Conduct definition of HHP criteria and monitoring and reporting of human and animal poisoning incidences and adverse environmental effects;

“The Code definition is the only agreed reference for identifying HHPs.”

(d) To build capacity in empower national regulatory authorities to make informed decision regarding the manufacture, import, sale, use and disposal of highly hazardous pesticides to enable their phase-out;

“in item (above) who would be capable of empowering national regulatory authorities”

(e) Encourage the national regulatory bodies to fully staff their organization and increase operational budget to support the resourcing needs for the proper implementation of the Rotterdam and Stockholm conventions, international code of conduct on pesticide management and national legislations;

(f) Develop a mechanism for increasing synergy among national regulatory bodies so that viable alternative HHPS we be widely used.

(g) To identify and share information about viable alternatives to HHPs, including which may be less hazardous pesticides, biopesticides or cultural and environmental management measures, biological controls, biopesticides and ecosystem based approaches; / To identify and share information about viable alternatives to HHPs mainly those registered in US and Canada, which may be less hazardous pesticides, biopesticides or cultural and environmental measures, support research and development of new formulation of biopesticides (CLI) and finally encourage the importation of biopesticides(CLI);

(h) Support the design and implementation of appropriate prevention-based programmes to manage phase-out the risks of highly hazardous pesticides and, where the risk cannot be managed, to promote their replacement with sustainable and less hazardous pest management tools and methods.
“Our previous comment regarding risk assessment based management apply.”

/This requires fundamentally different approaches to crop protection that include regulation of inputs such as Biological Control Agents, altered farming strategies and techniques, marketing strategies for agricultural produce and consumer education;/ This requires includes the development of new technologies and new fundamentally different approaches to crop protection that include regulation of inputs such as e.g. Biological Control Agents, high quality seeds and farming techniques, marketing strategies for agricultural produce and consumer education.

“Innovation is a key factor in developing countries to achieve a higher and more sustainable production.”

(i) To provide assistance to farmers to enable them to phase out avoid unacceptable risks from highly hazardous pesticides and substitute with less toxic pesticides while maintaining their agricultural livelihood;

(j) To provide assistance to health professionals on identifying, treating and reporting, diagnosis and treatment of pesticide poisonings and assist to promote efficient surveillance and identification of highly hazardous pesticides, create(d) within hospitals in big cities and in area of high pesticides application anti-poison centres;

“and in item (above) who would provide assistance to farmers and how would this be done?”

(k) To identify and share information about risk reduction strategies where HHPs cannot be replaced and why they continue to be used and also point out why no alternative could be found.

“The Recognition and Management of Pesticide Poisonings is an excellent reference guide that is updated regularly and can be made available for translation to other languages. We would be happy to provide electronic files. We believe that translating this document, at a minimum to Spanish and French, would be an excellent use of funds and a more efficient means of getting important information to other national regulatory authorities.”

28. To this end, SAICM will launch a Global Alliance to Phase out HHPs as a collaborative and participatory initiative to promote activities, facilitate communication between stakeholders, and monitor progress towards targets and goals. The Global Alliance to Phase-out HHPs could mobilize stakeholders around a common yet flexible voluntary agenda and facilitate stakeholder interactions in order to strengthen and complement existing initiatives.
The following table identified existing and proposed initiatives that contribute to the achievement of the above objectives:

<table>
<thead>
<tr>
<th>Objective</th>
<th>Implementers</th>
<th>Targets</th>
<th>Proposed actions to 2020</th>
<th>Related existing initiatives / current status / QSP results</th>
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<tbody>
<tr>
<td>To raise the awareness of government authorities and regulators, farmers, private sector, consumers, workers, trade unions, CSOs and health-care providers about the risks of highly hazardous pesticides and the availability of safer alternatives;</td>
<td>Governments IOMC (FAO, WHO, UNEP, ILO); Public interest NGOs (e.g. PAN, IPEN and their partner organizations); African Network for Chemical Analysis of Pesticides (ANCAP) Private Sector (CLI, AgroCare, food industry Trade Unions/ workers organisations Authorities of agriculture, health and environment</td>
<td>100 countries reached</td>
<td>To conduct awareness campaigns for stakeholders To develop a manual on HHPs and its safer alternatives. Promote global, regional and national programs and information campaigns, in order to promote awareness raising and participation of HPPS users, particularly those involved in the agricultural sector. These programs and campaigns would seek to identify risks, substitutes and Integrated Pest Management alternatives. At the regional and sub-regional levels: an advantage could be that several countries share the same language, as well as similar cultural and agricultural practices. In this scenario, there is a possibility of using mass media easily accessible by farmers and farm workers (eg. Radio and television). These campaigns can be implemented through inter-sectoral cooperation and also with the support of IOMC organizations.</td>
<td></td>
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<tr>
<td>To raise the awareness about and understanding of ecosystem approaches to pest management amongst government authorities and regulators, farmers, extension agents, researchers, private sector, consumers, workers, trade unions</td>
<td>To facilitate the identification of HHPs in use through cross reference to HHP definition in the Code of Conduct criteria and monitoring and reporting of human and animal poisoning incidences and adverse environmental effects;</td>
<td>To build capacity in empower national regulatory authorities with appropriate legislation and capacity to make informed decision regarding the manufacture, import, sale, use and disposal</td>
<td>IOMC</td>
<td>Public interest NGOs (e.g. PAN, IPEN)</td>
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of highly hazardous pesticides;  

<table>
<thead>
<tr>
<th>Public interest NGOs</th>
<th>regulatory authority at the national level</th>
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<tbody>
<tr>
<td>ANCAP</td>
<td></td>
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<tr>
<td>(“May be ANCAP can check on the registered pesticides, their toxicity and related actions required by relevant conventions to advice the national regulatory body”)</td>
<td></td>
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</table>

To identify and share information about viable alternatives to HHPs, which may be less hazardous pesticides, biopesticides or cultural and environmental measures, biological controls, and biopesticides;

<table>
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<tr>
<th>National regulators</th>
<th>Producers and disseminate YouTube videos and other web material to share successful farmer experiences in priority crops and other use sectors.</th>
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<tbody>
<tr>
<td>FAO</td>
<td>Documentation of ecosystem based approaches for pest management including organic farming and ecological agriculture experiences. Sharing these best practices and experiences widely.</td>
</tr>
<tr>
<td>Public interest NGOs (ANCAP)</td>
<td>To strengthen national capacities on PSMS</td>
</tr>
<tr>
<td>Private Sector (CLI, AgroCare, food industry)</td>
<td>To link national database to PSMS</td>
</tr>
<tr>
<td>Research Institutes</td>
<td>To train NGOs on PSMS</td>
</tr>
<tr>
<td>Academia</td>
<td>Promote mechanisms for information sharing, especially at the regional level.</td>
</tr>
<tr>
<td>Indigenous knowledge holders</td>
<td>Promote research programs to identify and develop biopesticides or non chemical alternatives to discourage HHPs usage.</td>
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<tr>
<th>PSMS (listing pesticide registered uses)</th>
<th>PAN Germany OISAT online information service</th>
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</table>
Support the design and implementation of appropriate prevention-based programmes to manage the risks of phase out highly hazardous pesticides and replace them, if and where needed, with sustainable and less hazardous pest management tools and methods. This may require fundamentally different new approaches to crop protection that include regulation of inputs such as, including use of Biological Control Agents, farming techniques, marketing strategies for agricultural produce and consumer education;

<table>
<thead>
<tr>
<th>FAO</th>
<th>WHO</th>
<th>Deliver training and guidance on robust procedures for fast-tracking registration of proven safer alternative products, e.g. biopesticides (in collaboration with export agriculture companies where useful).</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>National ministries/departments of agriculture, education</td>
<td>Guidance and support for stimulating consumer and market demand in-country for safer produce grown under agroecological practices, working with organised groups of trained farmers and using flexible systems for guaranteed organic and IPM practices.</td>
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<td></td>
<td>Extension services</td>
<td>Develop education materials for children</td>
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<td></td>
<td>Public interest NGOs (ANCAP)</td>
<td>Promote initiatives and activities to encourage countries to develop and implement economic instruments and cost recovery mechanisms that discourage the use of HPPS and allow means for the prevention and control actions risk caused by HPPS.</td>
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<td>Research centres (e.g. CGIAR centres and others)</td>
<td>Encourage the high level government to strengthen the agricultural authorities and the academia, so they can develop coherent programs, oriented to replace the use of HHP by less hazardous or environment friendly alternatives</td>
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<tr>
<td>Industry</td>
<td>Private Sector (food industry)</td>
<td>IPM-FFS programmes</td>
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<tr>
<td>Farmers and women’s networks</td>
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<tr>
<td>Local crop protection and vector management specialists</td>
<td></td>
<td></td>
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<tr>
<td>Food chain and standards organisations</td>
<td></td>
<td></td>
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<tr>
<td>Farmer networks</td>
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To provide assistance to farmers to enable them to manage the risks of phase out highly hazardous pesticides while maintaining their agricultural livelihood;

<table>
<thead>
<tr>
<th>FAO</th>
<th>Government</th>
<th>participatory farmer training such as FFS for 10,000 farmers in each of 20 countries</th>
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<tr>
<td></td>
<td>Public interest NGOs (ANCAP)</td>
<td>Web-based platforms for regional experience sharing and for participatory research on agroecological technology improvement, e.g. breeding cotton varieties more suitable for organic systems.</td>
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<td></td>
<td>Self-help networks</td>
<td>Update existing training modules and integrate with</td>
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<tr>
<th>IPM-FFS programmes</th>
<th>PAN and other public interest NGO projects on the ground with farmers networks</th>
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<td>WHO</td>
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</table>
| To provide assistance to health professionals on **identifying, treating and reporting pesticide poisonings** to promote efficient surveillance and identification of highly hazardous pesticides; | WHO | Document pesticide poisoning through community monitoring and report to relevant authorities in 20 countries | **Poison Centres**
PAN and other public interest NGO community monitoring project (CPAM and Drift Catcher) |
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<tbody>
<tr>
<td>To identify and share information about risk management and reduction strategies where the use of HHPs needs cannot be replaced and to be continued to be used.</td>
<td>Regulators, Industry, Trade Unions/agricultural workers organisations, Public interest NGOs, Private Sector (food industry)</td>
<td>To strengthen national capacities on risk reduction strategies dealing with HHPs To assist developing countries to identify and share information about risk reduction strategies of HHPS cannot be replaced and still used. To develop NGOs capacities on risk strategies dealing with HHPs To support NGOs to share information about risk reduction strategies of HHPS.</td>
<td></td>
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<tr>
<td><strong>To encourage the recognition and registration of non-chemicals pesticides and</strong></td>
<td>Regulators, NGOs</td>
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sharing of indigenous knowledge on pest management

Intellectual Property Organizations

To provide safe and responsible use training

Industry, government, NGOs

CLI Vision 2020, individual government and industry programs

Many Industry, government, NGO programs

Engagement with existing WHO, NGO and industry suicide prevention programs

Comment on table above by Ms. Marthe Rahelimala, Madagascar

“These are two new suggestions in the column of the Objective:
- To support the establishment or to establish an effective regulatory system for pesticide in countries that require it
- To develop a simplified extract of the Code of conduct on pesticide management for vendors and users with poor education and information networks”

31. The Conference will be invited to review and consider the attached proposal on HHPs and propose a path forward to enhance action in this area.
## OTHER COMMENTS

### Comments from Turkey

Mr. Mustafa Bagan, Turkey:

"...The users and the farmers are not completely aware of fatal effect of highly toxic pesticides. We can propose that for users or the farmers must have some kind of training certificate before using this kind of the products..."

### Comments from Egypt

Ms. Elham Aziz, Egypt:

- Real Inventories and Monitoring (water-soil-food)
- Analysis Equipment and accredit laboratories
- More studies on pesticide alternatives
- Technical Assistance
- Updating regulation
- Stop illegal trade
- Training Courses ToT (Toxicology, GHS)
- Emphasize GHS system
- Lack of poison information

### Comments from Ghana

Mr. Emmanuel Odjam-Akumatey, Ecological Restorations, Ghana:

"...the issue of illegal trade in the developing countries where the borders are porous can be an impediment in achieving the goal ...

### Comments from Mauritius

Mr. Vijay Boodhoo, Mauritius:

**Proposal for addressing Highly Hazardous Pesticides under SAICM [in Mauritius]**

**Individual stakeholder plans and priorities for HHPs between now and 2020**

**A Legislation on pesticides**

The Dangerous Chemicals Control Act (DCCA) is the main legislation providing the backbone of the management of all chemicals including pesticides in the country. The DCCA has been enacted to serve two main purposes mainly the prevention of damage to health and environment caused by dangerous chemicals and secondly for better protection of the workers and members of the public and the environment against dangerous chemicals.

The Dangerous Chemicals Control Act is administered by the Dangerous Chemicals Advisory Council (DCAC) and the Dangerous Chemicals Control Board (DCCB). The main schedule of the Act pertaining to pesticides is the second schedule (Part II) which gives a list of extremely dangerous or restricted agricultural chemicals. All pesticides are restricted chemicals in Mauritius and need registration by the board. Anyone trading in pesticides also needs a licence from the Board. Pesticides are finally controlled chemicals needing an import permit. The last schedule of the Act (Part II Agricultural chemicals) gives a list of about 70 pesticides banned in Mauritius. Regulations have already been made to include more pesticides in the list.

The DCAC is called upon to advise and make recommendations to the Minister responsible for Health on matters pertaining to dangerous chemicals including chemicals, provide advice on implementation of international chemical related conventions and also advice the other body, the Dangerous Chemicals Control Act, on any matters pertaining to the Act.

The Dangerous Chemicals Control Board is a multi sectoral coordination body which has a larger responsibility on the administration and enforcement of the Act. The Technical Committee for Agricultural chemicals makes recommendation to the Board for the registration of all pesticides, the granting of licences for trading in pesticides and the grant of import permits.
B. Ecological agriculture Action Plan for the State of Mauritius

With a view to gradually reducing the use of highly hazardous pesticides in Mauritius, and replacing them with bio-pesticides which are inherently less toxic, the Government of Mauritius has approved the setting up of a Steering Committee at the Ministry of Agro Industry, to review the list of highly hazardous pesticides that can be withdrawn from the market immediately or in a phased manner. The Committee is also to prepare a plan to promote ecological agriculture and promotion of alternative methods of pest control including an integrated pest control management approach. The Committee has recommended a list of sixteen insecticides to be withdrawn from the market. It is to be noted that the Dangerous Chemicals Control Board has already stopped issuing permits for nine pesticides in all. The Board is considering the phasing out of more pesticides appearing on the list.

C. POPS Management and disposal and integrated Vector Management

The main objectives of this project was to reduce dependence of malaria control on DDT, dispose of obsolete POPS stock and clean up POPS contaminated areas and develop alternative strategies for vector management. This Integrated Vector Management strategy includes identification, testing and selection of effective and safe alternatives to DDT, surveillance of mosquito breeding places and bed nets.

D. Health surveillance

Occupational Health Clinics are present in all hospitals to follow-up workers exposed to pesticides. Biological monitoring of workers is also done periodically to test exposure to pesticides (acetyl cholinesterase tests)

E. Awareness sessions and Workers’ Health Education.

Sensitisation of the general public, farmers and workers are organised on HHPs.

F. Implementation of provisions of the Dangerous Chemicals Control Act

Our objective between 2015 and 2020 will be the improvement of implementation of certain provisions of the Act which cannot be properly done now because of lack of staff and facilities.

Comments from Switzerland

Ms. Gabi Eingmann, Switzerland:

Generally, we consider the paper as very useful. It provides a good overview on the ongoing activities regarding the management of highly hazardous pesticides and identifies potential for further action. As we understand, the overall aim is to identify urgent actions to address this important issue which is actually an emerging policy issue under SAICM. But a well identify the responsible actors to be involved or even take the lead.

However, we see some potential for improvement.

- What we believe is missing, is the link to the existing SAICM documents such as the overarching policy strategy and in particular the GPA. Almost all of the proposed activities are already listed in one or another way in the Plan (activities 23- 42; 114-117). However, we could not find any reference to these activities in the document and how this initiative intends to contribute to their implementation. It would be good to demonstrate this link. Or if there is an intention to just to expand the time frame of the relevant GPA activities that goes mainly up to 2010/15?

- It is not clear why it is proposed to identify a lead country? Would this not undermine the key role of FAO/WHO in this area and as well contradict with the table listing the proposed objectives of the initiative? Or is there already a candidate willing to take this role?

- Moreover, what would be the role of SAICM as an instrument in the initiative, to bring together the stakeholder and contribute to further progress on this? Or should it become a more FAO/WHO lead process?

- Further, it could be useful to make a linkage with the SDGs goal 2 and indicate how this initiative could contribute achieving it.

- The specific objectives of the SAICM HHP initiative propose a number of assistance and empowering activities. It needs to be clarified how this would be met. Or in other words the document is rather silent about the funding. It may helpful to list as well the different existing funding sources for such an initiatives. GEF, funds provided through international organisations and agencies, bilateral support/development agencies, support from private sector and national governments.

- Finally, the Secretariat probably should develop a draft resolution text for ICCM4 in case there is any intention to get this initiative starter.
Overarching Comments on SAICM ‘Proposal for addressing Highly Hazardous Pesticides under SAICM’

1. CropLife International believes that the draft proposal on HHPs should be firmly set into the overall context of SAICM. We have therefore added a ‘Preamble’ to that effect.

SAICM is a unique global policy framework to support efforts to achieve the Johannesburg Plan of Implementation Goal and aims to coordinate, catalyze and facilitate the process. In this sense, the multi-stakeholder and multi-sectorial characters should be maintained. Equal opportunity is given to all stakeholders including industries and non-governmental organizations. It should also be kept in mind that SAICM is neither a legally binding power nor a replacement of existing institutions mechanisms. The scope of SAICM includes environmental, economic, social, health and labor aspects of chemical safety.

2. Consequential from this context are the following points:

2.1 The CropLife proposal on HHP criteria and management, only briefly referred to in the SAICM paper, should be viewed as a contribution within the framework and scope of SAICM, because the industry is a key stakeholder on this subject and brings benefit to society through supplying much needed tools for crop protection and thus food security and food safety. All stakeholders should be given equal opportunity to SAICM process to cover every scope of SAICM.

2.2 Risk assessment

The objectives of SAICM as stated in Overarching Policy Strategy (OPS) are

- risk reduction: elimination of unjustified or uncontrollable risk
- knowledge and information: knowledge and information which makes it possible to make life cycle control
- governance: establishment of international and national mechanism for comprehensive and effective chemical management
- capacity building and technical cooperation: to fill the gap between developed and developing countries and enhance the capacity in developing countries
- prohibition of illegal international transfer: strengthen and implementation of multinational agreements

One of the key concepts that run through the SAICM objectives stated in the Overarching Policy Statement is chemicals management based on risk assessment. The discussion should be based on risk-based management of pesticides, not hazard-based management as described in the draft proposal. In addition, growing gaps among the capacities of different countries to manage chemicals safely are serious issues and should be addressed appropriately. Lastly, objectives ii) to v) are considered to be tools for achieving objective i). In order to achieve the goal of minimizing impact of chemicals, attention should be paid to objectives ii) through v) rather than simply concentrating on the elimination of HHPs. Involvement and proposals of the Crop Protection Industry should get more emphasis.

In this context we like to point out that CropLife International fully supports IPM as defined in the International Code of Conduct on the Management of Pesticides and conducts farmer training on responsible use of pesticides on a global scale. Recently, through its regional and national organizations in Africa, it has been successfully implementing the Spray Service Provider (SSP) programme, the main objective of which is the establishment of a network of SSPs for the responsible, i.e. the safe and effective application of pesticides.

2.3 Importance of voluntary programmes

The voluntary nature of SAICM emphasizes the importance of voluntary programmes.

Stewardship and Responsible Care programmes initiated voluntarily by CropLife International and the International Council of Chemical Industry (ICCA), respectively, have been highly appreciated by policy makers. ‘Responsible Care’ has elicited special praise from the former Secretary General of the United Nations, Kofi Annan. He is on record stating that the Responsible Care programme is an excellent self-
control program which other industries should follow. The program aims at the continuous improvement of environment, safety and health and makes every effort to promote transparency and information sharing. The same is true for the CP industry’s ‘Stewardship programme’. Voluntary initiatives by the industry have contributed a great deal to risk reduction and information sharing of chemicals. With respect to HHPs, emphasis should be placed on the voluntary activity proposed by the Crop Protection industry. As the SAICM framework and concept embraces risk assessment, the industry proposal for managing HHP based on risk assessment is an excellent fit with SAICM.

2.4 Capacity building
Risk assessment based management of HHPs requires further and continuous capacity building in risk assessment, in particular in countries with less developed regulatory systems. The proposal on HHPs for ICCM 4 should therefore support such capacity building instead of advocating the banning of HHPs purely based on hazard, which would deprive farmers and growers of vital tools needed for achieving food safety and security. The Overarching Policy Statement of SAICM clearly supports this and the CropLife position on HHPs makes a clear commitment to such capacity building.

In summary:
- In the present context it is important to reconfirm the framework and concept of SAICM and firmly place the issue of HHPs within this framework and concept
- Emphasis should be placed on decision making based on scientific risk assessment and voluntary initiatives.
- Capacity building in countries with developing regulatory systems is a key element for appropriate pesticide management.

Detailed comments are provided as track changes (and/or comment bubbles as needed) in the attached version of the proposed SAICM paper.

Comments from Brazil
Mr. Luiz de Andrade Filho, Brazil

Consultation on proposal for addressing Highly Hazardous Pesticides under SAICM
1. The Government of Brazil welcomes the opportunity to provide comments on the proposal to address HHPs under SAICM. The proposal is an important input for organizing discussions on a multi-stakeholder process to help addressing social and environmental impacts of HHPs, especially in developing countries that do not count on systems and institutional arrangements for the management and control of pesticides.

2. In Brazil, the legal framework that regulates the production, import, packing, advertising, use, handling and disposal of pesticides is Law 7.802 of 1989, updated in 2002. According to this law, the Ministry of Agriculture, Livestock and Food Supply, the Environmental Agency (IBAMA) and the Health Surveillance Agency (ANVISA) are jointly responsible for registering and licensing pesticides. This decision-making process is primarily based on hazard assessments. The SAICM proposal constitutes an opportunity to identify new actions and mechanisms for updating the implementation of Law 7.802, particularly for proving governmental bodies with information on risk assessments tools and methodologies that would further enhance the current policy on pesticides management.

3. On the overall approach of the proposal, the Government of Brazil welcomes the fact that the proposed program on HHPs will build on available information and previous work, including decisions of FAO, the Rotterdam and Stockholm Conventions and outcomes of regional meetings organized by SAICM. The proposal is in line with Brazil’s National Implementation Plan of the Stockholm Convention, which foresees actions for the elimination of HHP stocks and waste.

4. In relation to individual stakeholder plans and priorities for HHPs between now and 2020, the Government of Brazil recommends the inclusion of plans for engaging with academic and research institutions, as well as to consider the
inclusion of other civil society organizations, including the ones based in developing countries, with capacity to better map and identify local challenges and peculiarities.

5. Regarding gaps identified within the proposal, the Government of Brazil suggests the addition of gap analysis on the establishment of quantitative criteria for the identification, definition and classification of HHPs.

6. Finally, on the objectives of the SAICM HHP initiative, the Government of Brazil suggests the inclusion of a component on supporting the design and implementation of programs for monitoring environmental contamination with HHPs. Such a component would help taking a broader perspective on dealing with environmental impacts of HHPs on the ground, for instance, impacts on ecosystems and water resources. The launching of such a component in a dedicated HHP initiative could be connected with SAICM’s Quick Start Programme Trust Fund.

Comments from IUF

The International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers’ Associations (IUF) is a global trade (labour) union federation representing workers in agriculture; the processing and manufacture of food and drink; hotels, restaurants, tourism and catering services, and tobacco processing. With national trade unions affiliates, representing a combined membership of over 12 million workers in 120 countries, the IUF organises workers throughout the global food chain or from ‘plough to plate’.

The IUF is committed “to actively promote the organisation of the world’s food resources for the common good of the population as a whole.” IUF rules lay down the basic principles of IUF food policy, which include a commitment to ensure an adequate supply of safe, affordable food for all. However, the IUF believes that much of the world’s food is produced in ways that are not “sustainable” in the longer-term from a social, economic or environmental viewpoint. This is especially true of health, safety and environment.

The IUF has long been promoting workplace occupational health and safety issues among its affiliated unions, particularly in agriculture and horticulture because these are among the most dangerous industries for the workers involved. Now climate change is causing more rural areas to experience prolonged droughts or floods. Crops fail and communities suffer loss of food and income. The local ecology is also being affected by agro-chemicals which damage the land, water or living organisms including insects which are vital to pollination. Global food security and the health and safety of agricultural workers and their communities are inextricably linked. To help support awareness-raising and activities on these issues among workers themselves, the IUF runs special projects with its affiliated unions. In recent years, these have included its Global Pesticides Project (GPP), the Roving Safety Reps (RSR) Project and the African Regional Occupational Health, Safety and Environment (OHSE) Project.

Highly Hazardous Pesticides questions are the major challenges to IUF and its affiliates. To this effect the IUF Congress has mandated the affiliates to work of these pesticides through campaign and education and training and awareness raising demand for their phase off, stricter controls and or possible global ban.

In the context of sound management of pesticides, what is lacking is reliable statistics on accidents and incidences of injuries and illness due to pesticides exposures.

We, all workers, employers and trade unions must get better at documenting all accidents and incidents that occur with pesticides. We must find out an easy way to do it on. We all know that a lot of people get hurt/ill from pesticides but there is really inadequate statistic about it.

IUF recommends the recognition of workers’ rights to information, consultation, education and training HPPS form the core policy framework on SAICM based on the four pillars of decent work: productive employment, rights at work, social protection and social dialogue.

Issues of sound management of HHPs can be best be handle through collective bargaining between management/farmer sand the workers and their trade unions.
Comments from Senegal

Mrs Fagamou Sy, Ministry of Environment, Senegal:

After reading the overall draft proposal for action on highly pesticides (HHPs) submitted to SAICM stakeholders for consideration, Senegal SAICM Focal institution (Direction de l'Environnement et des Etablissements Classées - Ministère de l'Environnement et du Développement Durable), has a great pleasure to acknowledge the major problems developing countries are facing with these chemicals are taking into account in this draft proposal.

However, we just would like to add a situation we frequently observe in our societies and which is related to "pesticides retailers" in our daily or weekly markets. These vendors are very often illiterate and consequently, ignore totally these chemicals health and environmental toxic impacts. These sold pesticides are sometimes difficult to be identified because their original packages are removed and replaced by small ones (very often small plastic bags), not labelled.

The followed item mentioned on the draft proposal (Gaps remaining and implications for the 2020 goal)

(c) Poor awareness among users about the hazards and risks of HHP use results in continued exposure and additional or cumulative adverse impacts on health and environment: might fulfil the senegalese above mentioned gap, but it need to be more clearly and more detailed.

We are congratulating the commitment of relevant intergovernmental institutions (like FAO, UNEP and WHO) and many other international, regional and national organizations, working groups dealing with chemicals, through meetings and approved plans, tools, mechanisms, to join their efforts in order to reach SAICM 2020 goals for the minimization of chemicals hazards in each level of their production and use within 2020.

In Senegal these efforts of communication and working together in order to reduce (minimize) adverse chemicals impacts on health and environment are being developed slowly through a national committee dealing with chemicals management (Arrêté ministériel n° 852 en date du 8 février 2002 portant création de la Commission nationale de gestion des produits chimiques). Some problems related to lack of functional means are delaying the activities of this committee.

So the issues of highly hazardous pesticides considered by SAICM, as other chemicals ones, can be addressed in this national committee whenever additional support to strengthen it is available.

Further comments will be added whenever necessary.
<table>
<thead>
<tr>
<th>No</th>
<th>Section</th>
<th>Line(s)</th>
<th>Comment on existing word / phrase / term / sentence</th>
<th>Justification / Explanation (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>9</td>
<td>1st</td>
<td>…better control. The word control may be replaced by the word management</td>
<td>Management has broader meaning.</td>
</tr>
<tr>
<td>2</td>
<td>10</td>
<td>1st</td>
<td>Few words may be added to the sentence as follows: The chemicals conventions and mechanisms which contribute specifically to pesticide risk reduction are as follows:</td>
<td>GHS is not a convention as of date.</td>
</tr>
<tr>
<td>3</td>
<td>10</td>
<td>6th -7th</td>
<td>The first mention of the word pesticides may be avoided in line 7.</td>
<td>There should not be an impression that all POPs are pesticides while reading this bullet.</td>
</tr>
<tr>
<td>4</td>
<td>10</td>
<td>9th</td>
<td>Full stop to be inserted after the word pesticide.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>11</td>
<td>2nd -3rd</td>
<td>Apart from production, distribution and sale, other steps are also significant for e.g. transportation, storage, disposal of empty containers.</td>
<td>The Life-Cycle Thinking approach and must be adopted while private sector is also encouraged display Extender Producer Responsibility (EPR) on HHPs.</td>
</tr>
<tr>
<td>6</td>
<td>18</td>
<td>3rd -5th</td>
<td>The sentence on the analytical capacity of labs. maybe rephrased as given below: ‘Few very developing countries currently have analytical laboratories, skilled personnel and associated resources so as to conduct routine analysis of pesticide formulations for determining the composition of the latter as well as to detect the presence or amounts of residues of pesticides in media like food crops, meat, soils, or water post-application of pesticides by end-users like planters, public health agencies, etc.’</td>
<td>Detecting manufacturing impurities may be important for producing companies but are less important for other stakeholders like public health regulators and consumers at large. Thus, quantitative or qualitative testing of pesticide residues would yield valuable data on the environmental fate of the pesticides by properly equipping the testing labs.</td>
</tr>
<tr>
<td>7</td>
<td>22</td>
<td>2nd</td>
<td>The sentence may include an additional word as follows: …system for managing pesticides…</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>22</td>
<td>4th</td>
<td>The sentence may include an additional word as follows: …that HHPs would continue to…</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>22</td>
<td>10th -11th</td>
<td>In addition to private sector, some governmental stakeholders such as Agricultural Research and Extension Officers, field scientists also play an important role in establishing safer alternatives or means of controlling pests due to their proximity with local farmers. With regards to awareness, the local media (e.g. via radio stations), cooperative societies, planter associations or other community fora would be useful to educate farmers in their local languages. The role of these stakeholders can be added in Section 26, if not already listed on pages 7 &amp; 8 (Table.)</td>
<td>Adding relevant stakeholders in the process would strengthen the multi-stakeholder approach as developed by SAICM.</td>
</tr>
<tr>
<td>10</td>
<td>22</td>
<td>7th -8th</td>
<td>The poor awareness may not only be for the users but also for Customs authorities, shipping / trading companies involved in dangerous goods carriage, port reception, storage / warehousing. Although not using HHPs, the latter have a legal responsibility when HHPs are in their jurisdiction at sea, port areas, etc.</td>
<td>Not all countries are producers of pesticides and many states rely on importation of the latter. Thus empowering these stakeholders would also be beneficial to the pesticide</td>
</tr>
<tr>
<td>No.</td>
<td>Page</td>
<td>Column 1</td>
<td>Column 2</td>
<td>Details</td>
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<tr>
<td>11</td>
<td>22</td>
<td>13\textsuperscript{th} - 14\textsuperscript{th}</td>
<td>As mentioned for number 10 above, local media can be very useful in educating and informing vendors, farmers, etc.</td>
<td>regulatory authorities.</td>
</tr>
<tr>
<td>12</td>
<td>22</td>
<td>17\textsuperscript{th} - 18\textsuperscript{th}</td>
<td>The targets can also be applicable for other aspects such as prohibition and disposal of HHPs.</td>
<td>Some HHPs may be prohibited but for others, their uses may be allowed based on strong conditions.</td>
</tr>
<tr>
<td>13</td>
<td>22</td>
<td>26\textsuperscript{th} - 27\textsuperscript{th}</td>
<td>It could be better to describe suicide (whether personal or collective) and self-harm as psycho-social health problem rather than a public health problem. In addition to suicide and self-harm, the scope may be extended to criminal acts via intentional poisonings i.e. using pesticides to purposely inflict harm or cause death to another individual or a group of individuals.</td>
<td>Pesticides may be wrongly used in society.</td>
</tr>
<tr>
<td>14</td>
<td>24</td>
<td>Last</td>
<td>The sentence may include an additional word as follows: … FAO and WHO during the year 2015.</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>26</td>
<td>2\textsuperscript{nd} – 4\textsuperscript{th}</td>
<td>R&amp;D institutions, Academia and the press (mass media) are among stakeholders for which information should be shared.</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>26</td>
<td>5\textsuperscript{th} – 6\textsuperscript{th}</td>
<td>Identification may signify that proper inventories of HHPs at national levels need to be developed by the year 2020 so as to meet with the SAICM Goal; however such inventories may be data intensive and take time to achieve.</td>
<td>Inventories of other chemical substances like POPs, Mercury &amp; its compounds have already been addressed under other MEAs/Conventions.</td>
</tr>
<tr>
<td>17</td>
<td>26</td>
<td>7\textsuperscript{th} – 8\textsuperscript{th}</td>
<td>Decisions may also be taken at regional levels (e.g. SADC or MENA) for harmonization of their actions addressing HHPs.</td>
<td>Specific regions often have common conditions, etc.</td>
</tr>
<tr>
<td>18</td>
<td>26</td>
<td>19\textsuperscript{th} – 20\textsuperscript{th}</td>
<td>The assistance should also be extended to occupational health professionals so as to establish any patterns or links between the use of HHPs and changing health status of workers e.g. hormonal imbalance or development of diseases like cancers.</td>
<td>People at work may be exposed to HHPs via different routes of entry into the body e.g. inhalation or dermal absorption causing health problems to them.</td>
</tr>
<tr>
<td>19</td>
<td>26</td>
<td>New</td>
<td>To enhance capacity building at local and regional levels especially to developing countries for pesticide formulation and residual pesticide testing works. Expert assistance from FAO, UNEP, WHO, etc. can be sought.</td>
<td>Lack of capacity already noted in section 18.</td>
</tr>
<tr>
<td>20</td>
<td>26</td>
<td>New</td>
<td>To identify sound and affordable disposal options for obsolete HHPs and to discourage any illegal trade HHPs and their precursors used in their manufacturing.</td>
<td>Wastes/obsolete HHPs to respect other chemicals conventions e.g. ‘Basel Convention on the transboundary movements of hazardous wastes’ must also be applied to HHPs.</td>
</tr>
</tbody>
</table>
Comments from
Philippines
Dear SAICM Secretariat:

This is in relation to your request for comments on the draft proposal for addressing Highly Hazardous Pesticides (HHPs) under SAICM. The following are our initial inputs.

The Department of Environment and Natural Resources (DENR) is the overall focal agency on the management of chemical substances and maintains a database of all chemicals which have entered the Philippine trade. The Fertilizer and Pesticide Authority (FPA) is mandated to protect the public from the risk of inherent use of pesticides. They implement a product stewardship program which covers the responsible and ethical management of a product from its invention or formulation through its ultimate use and final disposal.

Several national Inter-agency committees have also been formed to strengthen the policy formulation and implementation of the proper management of pesticides and chemicals. These inter-agency committees are composed of, to name a few, Department of Environment and Natural Resources, Department of Health, Department of Labor, the Bureau of Customs and the Department of Agriculture. With the guidance of these inter-agency committees, the Philippines has already banned about 32 pesticides which includes POPs and other hazardous pesticides with high volume usage, including HHPs.

Despite the collaborative efforts of the government, NGOs, academe, agricultural sector and other stakeholders, there are still much work that needs to be done to minimize the risk posed by the use and disposal of HHPs. Among the problems identified in the Philippines are:

- Lack of knowledge and public awareness, especially the end-users (farmers) on the harmful effects of pesticides to health and the environment.
- Limited manpower resources in monitoring the distribution, use (i.e. formulation, application, etc.) and disposal of pesticides.
- Unavailability and/or inaccessibility of data.
- Difficulty in monitoring the illegal entry of banned Pesticides.
- Lack of enabling instruments to implement international agreements / conventions / treaties
- Lack of monitoring and evaluation tools for assessing the effectiveness of structures in implementing chemical management.
In relation to these problems, may we recommend the inclusion of the following points and areas in the proposal:

1. In terms of the form, broad and specific objectives (item 25 and 26) may be placed after the background in item 6.

2. Recognize the role of the Customs, local police, local government units in the monitoring of the import/export, transport, and distribution of HHPs. This may be included as a part of the “Taking action on HHPs”.

There is an emerging data communication structure between customs of different countries in monitoring imports and exports (e.g. ASEAN Single Window). This can be utilized in the monitoring of the trans-boundary movement of HHPs.

3. Capacitate nations, specifically developing countries, in establishing or strengthening enabling instruments to implement international agreements, conventions and treaties (e.g. local regulatory policy on pesticides identified in these treaties and conventions).

4. Institutionalization of medical surveillance among users, formulators and handlers of HHP as part of health monitoring.

5. Include areas such as pesticide application methods (aerial spraying, manual backpack spraying, etc.) which is an important factor in possible human exposure and environmental contamination.

6. A guidance document on an efficient data gathering and monitoring methods and techniques (e.g. what information is necessary, how to get the information, etc.) to be able to measure the extent of the problems to be addressed.

We hope that these would merit your consideration. Rest assured of our continuing cooperation and participation on this concern.
Comments from Iraq

The Iraqi Ministry of Environment would like to present its greetings

In reference to your letter dated on 12 May 2015 concerning the above mentioned subject, we’d like to inform you the following:

1- There are national laws and legislations in Iraq for controlling safe usage of pesticides and banning the types that are hazardous to the environment and human health. Also there is a national list for banned and restricted pesticides in Iraq.

2- We suggest to add the following to the draft proposal:
   - Supporting the adoption of unified international classification for the highly hazardous pesticides according to the hazardous nature of the substance on the environment and public health.
   - Supporting the adoption of unified international list to banned or restricted pesticides.
   - Coordination with the CODEX Alimentarius commission /CODEX committee on pesticides residues and benefit from lists that prepared by them.
   - Supporting synergy and coordination between SAICM secretariat and BRS conventions in that regard.
   - Coordination with WHO to subsidize national health centers for measuring blood poisoning with pesticides and pesticides residues in body tissues and in food.