

REGULATION OF PESTICIDES IN INDIA

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Fundamental issues unaddressed?

- Pesticides in Agriculture taken as a 'given' - our regulation has not caught up with science of pest management and its evolution!
- Regulation as a 'clearing house' function....
“Regulate with a view to prevent risk to human beings or animals, and for matters connected therewith” - is biosafety prioritised, though? Or is there too much focus on clearing applications and in the apparatus on quality control alone (labs, inspectors...)?
- No need assessment or assessment of alternatives done before going in for registration (“*must be judged to be just as suitable as or to have advantages over....other methods for the purpose*”: Norway)

Issues with regulation (approvals)

- Enforcement of Act was transferred to the Ministry of Agriculture in the year 1970 by the Ministry of Health and Family Planning... **Conflict of Interest**
- Opaque functioning - no data out in the public domain
- No independent testing or even independent review of biosafety data
- No long term testing for chronic impacts
- Efficacy tests and their comparative frameworks questionable
- Are we going wrong with nomenclature itself? GEAC, for example. One Secretary for CIBRC - 'Registration Committee' here....PLUS popular nomenclature (dawaan) or even with IPM!

Issues with regulation....

- Regulation at the end-use level (crop spraying logs, elsewhere) almost totally missing - Where (parks, schools, water bodies, biodiversity spots), When, How....
- Acute Toxicity issues: Class Ia and Ib pesticides; Other pesticides that have caused acute toxicity related deaths
- Known carcinogens and endocrine disruptors manufactured and used - pesticides banned in some other countries
- No assessment of synergistic effects of cocktails of chemicals out there....
- Time bound approvals & phasing out sale/use elsewhere
- Reviews: not in-built. Wrong expertise drawn in

Issues with regulation, at consumption end (farmer/food consumer)

- “Indiscriminate Use”? - “Indiscriminate Recommendations” by universities also
- Regulation of advertising within the regulatory statute?
- No elaborate labeling with special warnings/symbols on different properties
- MRLs: not seen in a cumulative manner/dietary intake - created out of GAPs - should this be our main monitoring parameter?
- Findings of Ministry of Agriculture's "Monitoring of Pesticide Residues at National Level" at variance with independent monitoring of residues - no data put out proactively
- Private labs: expensive; reliable?; Public sector labs: not accessible to all
- Beyond MRLs: Eg of Punjab: Numerous exposure routes: what might be good monitoring indicators?

Civil society effort....

- No continuously active and coordinated work, as in the case of transgenics - organic farming promoters, medical experts, biodiversity boards, exporters, environmentalists, farmers'/agri-workers' rights groups, agri scientists, wildlife enthusiasts, consumer groups.....
- Not focusing on regulation at the state level (AP, Kerala examples of how it is possible)
- Not focusing enough on regulation that can promote ecological alternatives (Sikkim example)
- Claims around safer molecules: neo-nicotinoids, for eg. - are we keeping track? Herbicide use challenges
- **Concerted effort needed on improving Pesticides Management Bill (Biosafety Protection (Pesticides)) Act?**
- **Concerted effort needed on promoting agro-ecological approaches**

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