NATIONAL CONCLAVE ON FOOD

Pesticides Management in India

Sonam Taneja, Programme Manager, Food Safety and Toxins, CSE
CSE’s work on pesticides

Endosulphan (2001)

Bottled Water (2003)

Soft drinks (2003 & 2006)

Blood of Punjab Farmers (2005)

State of Pesticides Regulation in India (2013)
The JPC formed on Pesticide Residues in and Safety Standards for Soft Drinks, Fruit Juices and Other Beverages, in 2003,

Set out clear agenda for governments to ensure safe use of pesticides:

– mandatory the setting of maximum residue limits (MRL) for pesticides before registering it,

– setting MRLs for deemed registered pesticides, reviewing the set MRLs for compliance with the Acceptable Daily Intake (ADI) of pesticides and monitoring pesticide residues regularly
State of Pesticides Regulation in India - 2013

- MRLs not registered for over a quarter of pesticides registered then
- MRLs not been set for all crops some pesticides were registered for
- Few MRLs were set for crops for which the corresponding pesticide is not registered
- MRLs set for broad groups like fruits, vegetables and food grains rather than specific crops; while pesticides have been registered for specific crops
- State agriculture universities, agriculture departments and other boards for a crop recommended many pesticides that have not been registered for some crops
- Recommendations of waiting periods for pesticides are not complete
- Farmers found to be unaware of the registered uses of pesticides; mostly followed the pesticides as the dealers recommended them
Pesticides Management Bill, 2017
Pesticides should be regulated by MoHFW

- Ministry of Agriculture and Farmers’ Welfare:
  - Mandate is increasing **productivity**; ends-up **irrationally promoting** pesticides
  - Fails to recognize that pesticides are **hazardous chemicals**; must be used judiciously and as a **last-resort**
  - **Promoter cannot be regulator**; clear conflict of interest
- Legislative powers should be transferred to Ministry of Health and Family Welfare
  - Since it ultimately affects human health; mandate of MoHFW is to protect the health of people
- **International examples** – pesticide regulated by other than agriculture:
  - United States (Environmental Protection Agency)
  - Sweden (Swedish Chemicals Agency)
Focus should be minimizing pesticide use in view of public health and attaining sustainability; not productivity

• Objective of the law must be to minimize use of pesticides
• Preamble should be added to recognize that:
  – Use of pesticides is not sustainable
  – It is a temporary stop-gap arrangement
  – To use it as a last-resort meanwhile
• Critical failure to not recognize:
  – Pesticides have contributed significantly to the current economic, ecological and existential crisis in Indian agriculture
• Huge contradiction:
  – Government is promoting organic farming on one hand; promoting pesticides on the other
State governments must have a greater role and say in pesticide management in states

• Current law and the PMB, provides inadequate representation to states; further states governments can only prohibit sale of pesticides for no longer than 60 days (PMB proposes 180 days)

• States must have final power to disallow use of pesticides approved by Registration Committee; though not vice-versa
  – They have better idea about agro-ecological aspects including soil, climate, crops and pests etc.
  – Based on assessment and recommendation of an ‘Independent oversight committee’ in states
  – ‘Agriculture, including agricultural education and research, protection against pests and prevention of plant diseases’ is a state subject as per Schedule VII of the Constitution of India. In addition, use of pesticides strongly affects health of the people, and ‘Health’ is also a state subject

• Central Government must only be responsible for laws/standards on the lines of minimum national standards (MINAS)
Pesticides must be sold against a prescription by a professional and used accordingly

- Pesticides must be sold only under prescription of a professional expert and used accordingly
  - They are hazardous chemicals with multiple, severe and even fatal acute as well chronic toxic effects
  - They must be sold and used cautiously under supervision like drugs; like drugs - target, dosing, mode of application and unbiased advice is critical
  - Over-the-counter availability and dealer influence causing overuse and misuse
- A concept of Plant Health Experts; just like medical doctors or veterinarians must be introduced
  - Need not be agriculture extension officers; A private plant health consultant can prescribe based on farm visits, farm size and nature of pest attack
- Records of prescriptions should be maintained by the shops selling pesticides
- Any sale other than prescription should be unapproved and illegal
- News reports show that Kerala Government has made a law on similar grounds
Promotion of pesticides must not be allowed; must be considered illegal

- Like pharmaceutical drugs, promotion of pesticides must not be allowed:
  - **Advertisements of pesticides** must be banned in India. They are by design suited to the commercial interest of advertiser and aimed at influencing buying behavior of farmers, who are often uneducated and unaware of the marketing tactics.
  - Advertisements including **electronic** and **print media** in **national** or **local languages** as well as **disguised** promotion through sponsorships, conferences, seminars etc.

- **Last point of contact** with farmers should be agriculture officers and not company representatives; such interactions, if any, should be illegal.

- **Income** of dealer/company representatives should be **delinked from sales** of pesticides.

- A ‘**code of conduct**’ must be developed and followed by the pesticide companies. The progress and reports should be available for **audit** by the government.
Need to ban Class I pesticides in India
Class I pesticides should be banned in India (1/2)

- Based on acute toxicity, WHO classifies certain pesticides as:
  - Extremely hazardous (class Ia)
  - Highly hazardous (class Ib)
- Prior to August, 2018 - 18 class I pesticides were allowed in India; few of them used heavily and accounted for about 30 percent of the total pesticides used in India.
- These are also **banned** for use in several countries.
- **Deaths** related to pesticide poisoning in India are common
  - In 2014, National Crimes Records Bureau recorded 7,365 cases of poisoning due to accidental intake of insecticides/pesticides, out of which 5,915 died. In 2015, 7,060 deaths were reported out of 7,672 cases.

Necessary provisions should be made to ban Class I pesticides.
Class I pesticides should be banned in India (2/2)

- August, 2018 – 3 years after recommendations of Anupam Varma Committee, MoAFW banned 18 pesticides
- 7 / 18 Class I pesticides allowed in India – banned
- Many Class I pesticides banned were heavily used ones
- But, leaves out two heavily used Class I pesticides: Monocrotophos and Carbofuran
THANK YOU

For more information, contact

Amit Khurana,
Programme Director, Food Safety and Toxins
k_amit@cseindia.org

Sonam Taneja
Programme Manager, Food Safety and Toxins
sonam@cseindia.org

Vineet Kumar
Programme Officer, Food Safety and Toxins
vineet@cseindia.org