

Date : 06.08.2020

Joint Secretary (Plant Protection),
Ministry of Agriculture and Farmers Welfare,
Department of Agriculture, Cooperation and Farmers Welfare,
KrishiBhawan, New Delhi-110 001.

Sub: Comments/Suggestion on the Draft Banning of Insecticides Order
2020.

Ref. :1. Gazette Notification, No.:1351, dated 18th May 2020
2. Gazette Notification, No.: 1678, dated 13th June 2020.

PAN India welcomes the draft proposal of Ministry of Agriculture, Cooperation and Farmers Welfare, Government of India to ban the 27 toxic pesticides, which are currently used in India, but are already banned in one or more countries. We appreciate the continued effort of the Agriculture Ministry on regulating pesticides in India and considering the recommendations of Dr. Anupam Verma Committee report. We support its decision to ban the 27 pesticides recognising that the use of them 'are likely to involve risk to human being and animals as to render it expedient or necessary to take immediate action'.

PAN India would like to present the following facts for consideration:

Health Effects and Toxicity: With respect acute toxicity, three of the 27 pesticides belong to WHO Class Ib - Highly Hazardous category (carbofuran, methomyl and monocrotophos), 13 of them are included in the WHO Class II, Moderately Hazardous category. In addition to the health effects and toxicity information that has been given in the Draft Banning of Insecticides Order 2020, PAN India's analysis reveals that the insecticide Malathion was classified as probably carcinogenic chemical in 2015 by the International Agency for Research on Cancer. Further, All the eleven insecticides have neurotoxic risk as they belong to the organophosphate, organochlorine, carbamate and pyrethroid groups, which have their characteristic neurotoxic mode of action. Moreover, six of the 27 pesticides (atrazine, carbofuran, chlorpyrifos, malathion, mancozeb and monocrotophos) are on PANAP's list of Twenty Pesticides that are Toxic to Children, whose effects include birth defects, brain damage and reduced IQs.

Highly Hazardous pesticides (HHPs): Highly Hazardous Pesticides are defined as pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems such as WHO or GHS or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a country may be considered to be and treated as highly hazardous. Twelve of the 27 pesticides qualify the FAO-WHO JMPM criteria for HHPs. Additionally, 22 pesticides, including the aforementioned 12 qualify the PAN International's criteria for HHPs.

Table 1 Highly Hazardous Pesticides included in the 27 pesticides

| Pesticides qualify JMPM criteria for HHP | Pesticides qualify PAN Intl. criteria for HHP | |
|--|---|-------------------|
| 1. Butachlor | 1. Acephate | 13. Malathion |
| 2. Carbendazim | 2. Atrazine | 14. Mancozeb |
| 3. Carbofuran | 3. Benfuracarb | 15. Methomyl |
| 4. Dicofol | 4. Butachlor | 16. Monocrotophos |
| 5. Dinocap | 5. Carbendazim | 17. Oxyfluorfen |
| 6. Diuron | 6. Carbofuran | 18. Pendimethalin |
| 7. Malathion | 7. Chlorpyriphos | 19. Quinalphos |
| 8. Mancozeb | 8. Deltamethrin | 20. Thiodicarb |
| 9. Methomyl | 9. Dicofol | 21. Zineb |
| 10. Monocrotophos | 10. Dimethoate | 22. Ziram |
| 11. Oxyfluorfen | 11. Dinocap | |
| 12. Thiodicarb | 12. Diuron | |

Deemed to be registered pesticides and data gaps: In addition to the data gaps as noted in the Draft Banning of Insecticides Order 2020, PAN India's analysis shows that 16 of the 27 are 'deemed to be registered pesticides, in India, which means that they never undergone the process of registration scrutiny on the basis relevant data sets for the parameters such as efficacy, biosafety, residues,

persistence, waiting period, toxicity, health and environmental effects. They are 2,4-D, Atrazine, Butachlor, Captan, Carbofuran, Dicofol, Dimethoate, Dinocap, Diuron, Malathion, Mancozeb, Monocrotophos, Quinalphos, Thiram, Zineb and Ziram.

Use of the 27 pesticides in India: All the 27 pesticides are approved for use in pest/disease/weed control in grains, fruits, vegetables, and pulses in India for 238 crop pest-combinations. Further, 19 of the 27 are approved 30 usages for non-food crops such as cotton, jute, tobacco, and floriculture. Some of them are approved for use in aquatic, non-crop area and buildings.

MRL status and Food safety concerns in India: Among the 27 pesticides, five of them (Dicofol, Mancozeb, Thiram, Zineb, Ziram) do not have Maximum Residue Levels (MRLs) fixed for farm produce/commodities. **More over, it is shocking to know that 10 of the 27 pesticides are not been tested for their residues in commodities as part of the national program on residue monitoring. This means that, they are not been monitored in India for their residual contamination in food commodities in India, thus the level and extend of contamination is unknown.**

Pesticide Residues Detected in India: According to the report of Monitoring of Pesticide Residues at National Level by the Ministry of Agriculture and Farmers Welfare, residues of nine (acephate, carbendazim, chlorpyrifos, deltamethrin, dimethoate, malathion, mancozeb, monocrotophos, quinalphos) of the 27 pesticides were reported in the 2017-18 study, and many of them had residue level above the MRL. It has to be noted that, eight out of the nine were non-approved pesticides.

State level bans and restrictions in India: Some of the 27 pesticides are already addressed by State level regulations/bans in India. Monocrotophos was banned briefly by Adilabad District Collector and Ooty District Collector due to rampant illegal use and toxicity potential on food, environment and farmers in

2019. In 2018, Punjab Agriculture Department had sought to review licenses and not to issue fresh licenses for five (2,4-D, benfuracarb, dicofl, methomyl and monocrotophos) of the 27 pesticides because of harmful effects on human beings and environmental sustainability as well as economic viability. Maharashtra government prohibited two of them (monocrotophos and acephate) a couple of times in 2017 and later, as they were implicated in the high incidence of pesticides poisonings among cotton farming community. The State of Kerala already banned some of these pesticides such as monocrotophos, carbofuran, atrazine, etc. back in 2011 on the grounds of public health concerns.

Exports and Double standards: Allowing the manufacture and export of these pesticides reinforces “double standards” in international pesticides trade, wherein countries are allowed to export pesticides that are already banned in their home countries. Being a responsible member in the global community, and keeping in mind global environmental health and well-being, India should not allow pesticides banned domestically is produced and exported to other countries that keeps the cycle of poison going expanding with its harmful effects. Moreover, as huge quantity production is happening for these pesticides, allowing production for export would contribute to continuing pollution in the vicinity of production facilities; and would also lead to black marketing and illegal uses domestically. In view of these facts, PAN India urge the ministry of Agriculture Cooperation and Farmers Welfare to withdraw the permission for production for export of these pesticides as noted in the addendum notification dated 13th June 2020.

PAN India recognise that the proposal of banning 27 pesticides is a responsible, welcoming development and timely decision from the authorities for protecting public health and environmental well being in the country. Some of the pesticides proposed for ban are implicated in both occupational and self-poisonings in India. Monocrotophos, quinalphos, chlorpyrifos, acephate and malathion were reported as pesticides responsible for poisoning deaths in India. Therefore banning them is expected to bring down poisoning incidences and ensuring a safe working environment in the country.

Moreover, an analysis by PAN India shows that, currently 295 pesticides are registered for use in India and these 27 pesticides (11 insecticides, nine fungicides and 7 weedicides) forms less than 10 percent of them. Hence banning these 27 pesticides would not impact food security and agriculture production in the country as the assessment of the Ministry of Agriculture as noted in the draft ban order has found that alternatives are available to all of them. As several pesticides are registered and approved for use in India for a single crop pest combination, banning some of them would not affect crop health management but would definitely contribute to reducing toxic burden of communities.

Further, the conditions of pesticide use in India, such as warm and humid weather, poorly or little literate and naive farming community, poor awareness on the risks and hazards of toxic agrochemicals; lack of availability, accessibility and affordability of recommended Personal Protective Equipments and its unsuitability in the given weather; biodiversity rich and diverse agroecological regions, etc. does not allow safe use of pesticides in the country. Therefore, use of pesticides in India can never follow the guidelines in the International Code of Conduct on Pesticides Management put forth by the World Health Organisation and the Food and Agriculture Organisation of the United Nations.

Hence PAN India strongly recommends the Agriculture Ministry to ban all these 27 pesticides without delay. Further PAN India urges the Agriculture Ministry to review all the remaining pesticides registered in India with the same criteria used for assessing the 27 chemicals and come up with stringent regulatory measures, including a possible ban of more hazardous pesticides.

PAN India would like to propose that, non chemical farming practices needs much more support from the government and farmers needs to be handhold for taking up and extending such farming methods. Support in terms of subsidies, incentives and marketing assistance etc. needs to be enhanced for encouraging farming communities to move forward with non-chemical farming methods focussing on agroecological principles and thus to have fair access in the international market. Additionally, PAN India recommends the ministry of Agriculture Cooperation and

Farmers Welfare to put in efforts and facilitate encouraging the manufacturers of these toxic pesticides to come up with non toxic pest control products that help boost sustainable, non-chemical farming methods.

We have high hopes that the ministry of Agriculture Cooperation and Farmers Welfare will stand by the findings of its expert panel and that it will base its final decision on independent, global, and scientific evidence and concrete experiences of farmers, not the self-serving and profit-motivated statements by the chemical industry. We request the Ministry to ban production, export, import and usage of all these 27 pesticides, as recommended and as notified on 18th May, 2020.

Thank you,



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About PAN India

PAN India is a public interest, non profit, research and advocacy organisation working to eliminate human and environmental harm caused by pesticides and uphold agroecology. PAN India is keen to help communities and governments to reduce dependence on toxic chemicals for pest control in agriculture, household as well as public health and to increase the use of sustainable alternatives. PAN India is committed to safe farming, safe living and safe working place. PAN India is working to make India a world leader in Agroecology by empowering farming communities to keep away from toxic pesticides and agrochemicals, and to take up non chemical methods of farming practices that champion traditional knowledge, biodiversity, and farmer participated research in attaining food sovereignty.