



INDIA FOR SAFE FOOD

A-124/6, First Floor, Katwaria Sarai, New Delhi 16

To:

January 29th, 2016

Shri Radhamohan Singh,
Hon'ble Minister for Agriculture & Farmers' Welfare,
Government of India.

Dear Sir,

Sub: Review of pesticide usage in India, including of chemicals which have been banned elsewhere in the world – reg.

Namaste! We congratulate the government for setting up the Anupam Verma Committee to review the continued use in India of 66 pesticides that have been banned elsewhere in the world, and the Anupam Verma Committee itself for giving its report that recommended a ban on 13 of those pesticides and a phasing out by 2020 of 6 of the pesticides reviewed. We also appreciate some of the general recommendations that the Committee came up with and hope that the Government will immediately implement them. However, we would like to point out that none of this really goes anywhere close to the serious and comprehensive overhaul that the pesticides regulatory regime needs in India, for the sake of our farm livelihoods and biosafety. We present these matters in greater detail below.

1. The Anupam Verma Committee has recommended that each pesticide should be reviewed at ten years' interval after registration. Such automatic review periodically is something that many civil society groups have been demanding for a long time, and such a period should be fixed for five years, given constant data and evidence generation all over the world for a scientific appraisal to take place. As you might be aware, in several Scandinavian countries, registration is for five years after which each pesticide comes up for an automatic review.
2. We also find that a more basic component related to registration of pesticides is not being debated and incorporated into the regulatory regime: each pesticide's bio-efficacy and bio-safety assessment should be preceded by a **Needs and Alternatives Assessment**. Why should so many chemicals be registered in the first instance when farming can be done without such chemicals? The Indian pesticides regulatory regime has not caught up with the advances in pest management science, and it is important that the regulatory regime lay adequate emphasis on its original purpose as per the Indian statute (Insecticides Act 1968) – that of safety. The Insecticides Act has been enacted ***“with a view to prevent risk to human beings or animals”***.

3. It is also noteworthy that the government is not fully updated on developments elsewhere in the world – for instance, on the floor of the Parliament (Starred Question No. 127, dated 8/12/2015), only 66 pesticides were listed as those which have been banned / restricted in other countries of the world, including USA and Europe but are permitted for use in India. We find that such a list is inaccurate in not listing out some more pesticides – Glyphosate is an illustrative example. As you know, the WHO classified Glyphosate to be a probable human carcinogen in March 2015. Glyphosate has been banned / restricted in countries like Sri Lanka, Netherlands, France, Colombia, Canada etc. Such blatant omissions make us conclude that either the government is not serious about reviewing such toxic chemicals or is trying to protect the business interests of particular MNCs like Monsanto, which profiteer mostly by glyphosate-tolerant GM crops, selling both GM seeds and accompanying chemicals. Isoproturon is another example of a pesticide not listed amongst the 66 pesticides that were mentioned in the Parliament, and studied by the Anupam Verma Committee. It appears that this is a chemical banned in the UK and Denmark, for instance. In India, it is one of the largest used herbicides.
4. We are also concerned about the reported recommendation of this Committee to continue with the use of neonicotinoid class of pesticides. After the bee colony collapse phenomenon worldwide was linked to scientific evidence pointing to neonicotinoids as culprits for the same, several countries have banned or restricted the usage of this class of pesticides. While the restrictions elsewhere are mostly related to seed treatment, it is interesting to note that the Verma Committee recommended that use of neonicotinoids may be allowed with instructions to not spray during flowering stage of the crop. This ignores the impact that some of the neonicotinoid pesticides leave by systemic action by way of seed coating/treatment. This also leaves implementation issues around the restriction (during flowering stage) unclear. As we point out in another part of this letter, end use regulation is absent in India after pesticides are sold at the retail point, and in such a context, leaving a mere instruction will not help to save our bees and other life forms.
5. We believe that Review Committees being headed by Agriculture Scientists bring a limitation to the entire review process. In the past too, as with the Anupam Verma Committee, it is agriculture scientists who have been trained to think that there are no non-pesticidal solutions to plant protection, who have been mostly involved in such review processes. Their ability to wade through toxicity evidence (eco-toxicity as well as toxicity to human beings) is obviously limited, and such review processes would do well to be headed by medical experts.
6. We welcome the recommendation of Anupam Verma Committee wherein they recommended that ***Children and pregnant women should not be exposed to pesticides.*** This is indeed a much-needed measure in India. We had in the past brought out a report called [“Serving Death”](#), specifically in the context of children’s exposure to pesticides, including by accidental exposure. The report is available at: <http://indiaforsafefood.in/PDF/ServingDeath.pdf>. We urge you to kindly release a notification immediately banning spraying of pesticides in and near schools and

anganwadis, hospitals, eco-sensitive zones etc. Kindly notify guidelines using the powers that exist within the Insecticides Act to create such buffer zones around these vulnerable locations. There is also a need to regulate use of pesticides in ways other than spraying, in such locations. Further, proper framing and enforcement of maternity benefits throughout the period of pregnancy should enable rural women from staying away from pesticide-sprayed fields for want of an income source during pregnancy also. It should also be remembered that several impacts of pesticides are also because of exposure of men to pesticides, manifesting themselves in the reproductive health of the spouse and the life and development of the children born to them.

Further, to better implement several of the important recommendations of the Committee such as the above, we urge the Ministry of Agriculture & Farmers Welfare along with Ministry of Health & Family Welfare, to start a portal that collects information from public as well as certain line departments on pesticide poisoning cases – accidental, occupational and intentional – from any public-spirited citizens in addition to concerned line departments (hospitals under health departments, workers' health status as already recommended by Anupam Verma Committee by the labour department etc.) which mentions full details of the poisoning case including whether it was intentional or accidental or occupational exposure that led to the poisoning, whether it included hospitalization or even death, which pesticide was involved in each such instance, the details about the containers also, including labeling etc. Each such reporting on the portal should then trigger an investigation to confirm the same, and over a period of time, this body of evidence should be used by the government in its assessment of pesticides.

7. In a situation where end-use regulation is absent and also near-impossible to enforce, recommendations like the above and other restrictions like avoidance of use during active foraging period of honeybees etc., require more drastic action. It requires severe restrictions on licensing and sale itself.
8. This is the first time in India that any Committee has recommended a ban on 13 pesticides and a phasing out on 6 others, out of the 66 that it reviewed. As you are kindly aware, while there are 261 pesticides registered in India, there are only 28 pesticides that have been banned in all these years from the time the statute was enacted. This reveals the unscientific approach in the regulatory regime which has not caught up with the post-modern pest management science that is working successfully on the ground; it is probably also a manifestation of the vested interests of the pesticide industry at work. This Committee has recommended to a little extent what is a long overdue measure – of banning many hazardous pesticides in India. In fact, the discovery of the hazard is only a function of evidence-building on which the government does not spend much fund for scientific studies on biosafety. In such a context, the dilution of the recommendation by the CIBRC, which has decided that the complete ban on use will come into effect as late as January 2018 is unacceptable. The ban should be immediately effective on not just manufacture and import but on use too. There is no justification on the continued use of these pesticides once the environmental and health grounds for such a ban are ratified.

Why should our environment and citizens be subjected to an exposure and adverse impact for two more years in the enforcement of the recommendation?

9. Lastly, it also appears that many pesticides which constitute [the larger chunk of the pesticides' industry market](#) have been recommended to be continued till further review in 2018. These include acephate, dimethoate, malathion, monocrotophos, quinalphos, carbendazim, mancozeb, butachlor etc. This makes us wonder if the Committee was influenced by this parameter and therefore, recommended their continuation until further review. Further, biosafety data generation has been left to the pesticides industry, for decision-making during the 2018 review process, which does not lend much confidence on the process.

We urge you to kindly look into the above points and ensure that India's regulatory regime gets a comprehensive overhaul to meet the primary objective of the Insecticides Act, and that our food and farming systems are not contaminated with toxins. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Kavitha" with a stylized flourish underneath.

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