

FAO Pesticide Registration Toolkit

The FAO Pesticide Registration Toolkit is a decision support system for pesticide registrars in low- and middle-income countries. It will assist these registrars in the evaluation and authorization of pesticides. The Toolkit can best be described as a web-based registration handbook intended for day-to-day use by pesticide registrars. Practitioners working in pesticide management can use the Toolkit to support several of their regular tasks, including finding various information such as pesticides registered elsewhere, Maximum Registration Limits, Highly Hazardous Pesticides as well as Public Health Pesticides.

About the Presenter



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Harold van der Valk works as an independent consultant in pesticide management, pesticide risk assessment and pesticide registration and runs a consultancy, called Falconsult, based in the Netherlands. Harold has been actively involved in developing the FAO toolkit. To get in touch with Harold, you can email him at: harold@falconsult.eu.

Question 1: What are the major challenges in regulation of pesticides faced in your country? List the top 3 and explain why these are listed.

South Africa	Lack of enforcement by regulator: Shortage of poor delegated function towards Municipalities to enforce the law. Inability to regulate empty containers: local economic development has opened doors for small and medium enterprises, emerging business includes pesticide service providers. Difficulty in regulating the use of Street pesticides: readily available and cross border entry of illegal pesticides - information of the products labeling is foreign language.
Uganda	Fake and counterfeit pesticides are common among the pesticide dealers in Uganda. This is as a result of allowing repackaging of pesticides within the country and also porous borders that are usually manned by one or no staff.
Malawi	Lack of analytical facilities to support registration and compliance monitoring: where imported pesticides are not tested to ascertain their compliance to specifications. Porous borders which promote smuggling of cheap substandard products from other countries. Missing pesticide legislation: loopholes in the legislation where issues of disposal are apparently left in the hands of government.
Eswatini	Lack of the operationalization of the Pesticide Management Act: limited financial resources and capacity in terms of well knowledgeable people on pesticides management. No laboratory infrastructure in place for testing and detecting counterfeit pesticides. Lack of a disposal facility for empty pesticides container, hence their accumulation in farms.
Zimbabwe	Below standard storage facilities of chemicals within agrodealers not meeting the standards and requirements by the Ministry of Agriculture. Existence of counterfeit and fake products on the market: exposes farmers to products that are not efficacious or highly hazardous chemicals (HHPs) that are banned. Data shortages: submission of only analytical data with no supporting data on product.
Zambia	Lack of locally generated toxicological and ecotoxic data for risk assessment before registration. Poor management of empty pesticides containers. Poor enforcement mechanisms.
Tanzania	Little staff in regulatory authority: staff of the regulatory authority from Tanzania are not aware on the issue of International conventions and guidelines for pesticides reduction. Lack of expertise on the area of risk assessments: Limited access of information from other countries. Lack of financial resources for capacity building on the the conduction of risk assessment is another challenge for Tanzanian regulatory authority.
Nigeria	Improper Evaluation of Pesticides: Improper evaluation of pesticides prior to registration is due to the lack of skilled personnel in the Registration Council available in the country. Ineffective Compliance Monitoring and Law enforcement: Compliance monitoring council sometimes are not active. Political barrier: chief producers or importers of pesticides deliberately delay the amendment of important pesticide regulation policy.
Togo	Technical and scientific evaluation: scientific evaluation is not done to know check correct concentration as stated by manufacturers. Risk analysis before registration: needs to be done according to local conditions to determine the level of toxicity or ecotoxicity. Post registration monitoring of pesticide impact.
Belize	Disposal of Empty Pesticide Container. Expired Pesticides. Re-bottling of Pesticides. All of these issues are not addressed in the current legislation; so, it makes it hard to "enforce" if there is no legal support surrounding the matter. The matter of procurement, distribution/sale and use along w disposal of the PLC would need to be addressed in the update.

Question 2: Have you used any of the guidance and /or information presented in the toolkit to address the issues you listed in question 1? What kind of future activity do you believe this tool would be useful in your line of work and/or for your organisation

Uganda: The toolkit has been used to compare dossiers submitted for evaluation to other technical reports done (especially those in developed countries). Because we have limited capacity to carry out our own experiments in Uganda, the tool kit is useful to help us come up with actions to reduce the pesticides risks and make informed decisions.

Zambia: The FAO Toolkit is useful to verify information submitted in the pesticides dossiers. We also use it to check the status of pesticides registered in other countries. Since Zambia is implementing GHS, the toolkit has been useful to access the GHS classification system. Zambia will rely on the toolkit to conduct risk assessments on the submitted dossiers and come up with risk reduction options.

Zimbabwe: The Tool kit has not been used by health officials to access information on insecticides. Updated information on pesticides is not easily accessible on the internet, If accessible, the sources may not be reliable and the only credible choice will be the Tool kit. In future I will use information about Hazard classification and the Pesticide properties on product stewardship.

Malawi: We have mainly consulted the tool on regulatory decisions by other countries of a yet to be registered pesticide.

Togo: Fao pesticide toolkit is a good document to help pesticide regulator, policy maker to help in risk mitigation link to pesticide registration. Registration strategies is an important part which will help members of pesticide registration committee to overcome the lack of analysis. FAO toolkit is helpful during registration process.

Belize: After receiving the registration toolkit training in 2017, the secretariat started assessing efficacy trials before assessing the environmental/health data. Processes. The toolkit should finish uploading all the data set requirements listed under it address or provide template forms of re-registration

South Africa: The toolkit can be valuable in the development of a uniformed legislation addressing pesticides. It will present the SA government with data on pesticides being used and banned else where in the world.

Estwatin: The guidance on the information required for the registration of pesticides, since the country does not have the relevant infrastructure for testing pesticide properties such as toxicity, the guidance material would be useful for decision making.

Nigeria: The toolkit will help assist the registration and regulation departments to have a proper understanding of pesticide risks, in the evaluation of pesticides and in drawing an assessment to make proper decision prior to registration.

Tanzania: We use guidance/information presented in the toolkit; regarding registration strategies; registration process; data requirements; assessment methods; risk mitigation. We need training on the use of Pesticide registration toolkit to help solve challenges regarding reduction of HHPs and alternatives to pesticide.

PRESENTERS NOTE: The Toolkit indeed was never meant to be mandatory. It is a tool; not a rule. However, we hope that regulators will submit information to FAO because they see it is useful to have such information at hand.

Question 3: What kind of training is key for the use of the toolkit and what mechanisms are needed to make this guidance better known by stakeholders (especially experts in authorities)?

KIND OF TRAINING	MECHANISMS NEEDED TO MAKE THE GUIDENCE KNOWN BY STAKEHOLDERS
Control of certain pests	The toolkit could effectively be used as a guide in the control and management of pesticides
Awareness	FAO workshops and train the trainee awareneses. Training the important stakeholders in the regulatory authority for the utilization of the tool kit for registration
Online Training	Online training to include more people who cannot attend the face to face training. Short little quizzes asking a person to find specific info in the toolkit, online, would be most helpful.
Risk assessment	Environmental risk assessment training is critical.
Identification of pesticides	Especially training to investigate and identify unregistered or incorrect use of pesticides.
National workshops for national authorities	Especially if trainers are given the opportunity to understand national situation so that the training tailor made to cover weak points in the current system. Sensitization workshops for all national stakeholders could help spread the awareness.
Training on Pesticide Registration	To help officials know and understand that not all imported products are legal. Proper implementation of the toolkit on registration of pesticides.
Medical practicioners	Medical practitioners may also be targeted for training on management of cases that are admitted to health facilities due to pesticide poisoning.
Presenters notes	The use of the Toolkit is not restricted to regulators only. It's open to pesticide risk managers/champions. FAO has just activated a new Forum for pesticide regulators and former trainees of the Toolkit workshops. You can access it through the "Dgroups" button in the top menu.

Resources and Further Reading

1. FAO Pesticide Registration Toolkit web site: <http://www.fao.org/pesticide-registration-toolkit/en/>

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The **Division of Environmental Health (DEH)** Pesticide Discussion Forum is a bi-monthly online seminar for pesticide regulators and resource persons, as well as students in the Post-Graduate Diploma in Pesticide Risk Management (DPRM). Our aim is to provide support for managing pesticide risks and implementing risk reduction strategies. DEH is based in the School of Public Health and Family Medicine at the University of Cape Town (UCT).

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