

SADC GUIDELINES ON PESTICIDES MANAGEMENT AND RISK REDUCTION

The SADC Guidelines on Pesticide Management and Risk Reduction provides an opportunity for the region to take a harmonised approach to register, authorise, use and control pesticide, formulations and products. The guidelines provide a mechanism to safeguard humans, animals and environmental integrity. The guidelines therefore provide for regional collaboration and harmonization on pesticide management and risk reduction. The guidelines provide a step-wise approach to manage pesticides using a holistic approach from production to disposal making it possible to address issues of pesticides risk management and risk reduction.

About the Presenter



Christopher Kanema works for the Zambia Environmental Management Agency (ZEMA) as Principal Inspector and Heads the unit responsible for sound management of Pesticides and Toxic Substances in Zambia. He has coordinated several projects in Zambia on sound management of chemicals in general and pesticides in particular. He is currently the focal point for the Rotterdam Convention on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. He is a member of several Technical Committees including the Southern African Pesticides Regulators Forum (SAPReF).

DISCLAIMER: The information below represents the opinions of members participating from different countries expressed during the discussion and shall not necessarily be taken to reflect the official opinion of the DEH, UCT, SIDA or Keml.

Question 1: Review the articles in the guidelines and mention three articles that may present a challenge to implement the SADC guidelines at regional and national level. Give reasons and state how such challenges may be overcome?

ARTICLE	CHALLENGE
Article 1: Definitions	Definition of the word "Disposal" its limited. It does not tell us how to dispose of pesticide either in the form of recycling, neutralizing, isolation of pesticide waste and the containers.
Article 3: Harmonization	The guide does not address how often and on what platform the exchange of information will occur and if countries are not careful the day-to-day activities can be consuming, limiting frequent meetings.
Article 5: International Regulatory Framework	Having "binding documents" does not translate to their acceptance at country level. However, it can be overcome by advocating for the acceptance of the binding regulatory frameworks through representatives of national regulators for each country. Another challenge is that it might take some time (years) before member countries completely sign onto them that would affect the progress of "harmonization" when some member countries are progressing faster than other.
Article 6: International Policy Framework	Implementation of non-legally binding policy frameworks at national level requires availability of human and technical resources for their implementation. An example is that some countries have not adopted GHS system of classification and labeling of chemicals in their countries while some have their own colour coding systems.
Article 8 section 8	Member states are encouraged to evaluate and register pesticides before authorizing their use. It is not possible that all pesticides will be registered because in LMIC the issue of illegal trade and illegal ground crossing routes still exist. This perpetuates selling of decanted pesticides. There is a need to provide guidance to sort street vending of pesticides.
Article 9: Sharing of results:	Most member states are usually not willing to share information. Results can only be shared when the other party is willing to pay the research costs. It won't be implemented at the regional level because of the lack of the following guidelines in the region: data requirements for pesticide registration; protocols for bio efficacy evaluation of pesticides; for supervised residue trials; guidelines for designated centers for bio efficacy trials; guidelines for the protection of confidential business information (CBI). The challenge can be overcome by: guidelines developed by the expertise from the member states nominated by the SADC Secretariat and validated by the stakeholders of each of the member states and by stakeholders in the region.
Article 11: Import and Export requirements	Each SADC member state has its own import and export requirements for pesticides according to the national law and regulations. Overcoming the challenge: development of the SADC harmonized system that will involve all member states, the stakeholders engaged in pesticides should validate the harmonized system/guidelines stakeholders should create awareness.
Article 12: Classification and Labeling of Pesticides	Classification and labeling of pesticides is not uniform across many countries. SADC should advocate for its harmonization through ministers in each country who will in turn advocate for changes in the legislations in different countries. Classification and labeling- language barriers as some countries like SA have 11 official languages
Article 15: Information exchange	The complexity of data collection is still a challenge for SADC countries. Implementation of surveillance strategies is costly. Protection of CBI is a stumbling block, regulations must be indicating that such information can be shared for the purpose of protecting / saving lives and the environment.
Article 16: Storage, Transport, and disposal	The implementation of this article would be impossible as there are no SADC harmonized guidelines on the storage, transportation, and disposal of obsolete pesticides and pesticide empty containers. The challenge can be overcome by: developing SADC harmonized guidelines using the guidance of the International Code of Conduct on pesticide management and other international guidelines on sound management of chemical wastes.
Article 17: Advertising	Adverts sent directly to advertising agents are difficult to regulate. There is need to lobby the private sector so that adverts are sent through the pesticide registration office, however, challenges will occur due to the non-availability of adequate staff for this purpose.

Question 2: Kindly identify the following in the guideline:

- i. Key areas for regional and national collaboration and suggest others you think are important.
- ii. Areas that require harmonization in the region with respect to pesticides management and risk reduction.

KEY AREAS FOR REGIONAL AND NATIONAL COLLABORATION:

- ❖ SAPRef should play a bigger role in the harmonization of registration trials, regional labs and funding for cross boundary facilitation.
- ❖ Information exchange on legislation, policy, imports/exports; use practices; illegal pesticide trading activities; training etc.
- ❖ Registration of the pesticides: Perhaps a member state already has a good registration platform that would only need strengthening with extended technical collaboration and would be used as a model for other member countries.
- ❖ Areas that require harmonization in the region concerning pesticide management and risk reduction. a) Data requirements for pesticides registration. b) Bioefficacy evaluation of pesticides. c) Supervised residue trials to set Maximum Residue Limits. d) Designated centers for bioefficacy trials. e) Protection of CBI.
- ❖ Laboratory testing facilities and regional training and education on pesticide life cycle management and minimization on over purchasing of unwanted stocks, supply and demand principle application and avoid acceptance of irrelevant donated stocks by HICs.
- ❖ All stakeholders should be appraised on the national legislation and guidelines as an awareness process.
- ❖ National players should collaborate on information exchange and update each other on new developments on pesticide use.
- ❖ Pesticides that are harmful to the environment and people in general should be deregistered ASAP in all member states.
- ❖ Areas which require harmonisation in the region with respect to pesticides is: testing of the pesticides, registration and legislation of pesticides.
- ❖ Regional collaboration in developing guidelines for: a) Information exchange. b) Trainings conducted in pesticides management. c) Laboratory for testing of pesticides.
- ❖ Using other countries' information for registration or minor use crops and emerging problems as most countries need 3 geographical zones for data collection for registration.
- ❖ Key areas that need regional collaboration are the development of guidelines for: a) Legislation b) Import and export requirements. c) Information exchange. d) Labeling, storage, transport and disposal of obsolete and pesticide empty containers. e) Policy for integrated pest management. f) Harmonized Guidelines for the management of public health and veterinary pesticides and risk reduction.

AREAS THAT REQUIRE HARMONIZATION IN THE REGION

- ❖ Harmonization of pesticide registration dossiers is required at regional level. Results of field trials should be accepted across member states. Efforts should be made across the region so that classification and labeling of pesticides is harmonized.
- ❖ Areas which require harmonisation in the region with respect to pesticides is the Testing of the pesticides, Registration and Legislation of pesticides. Pesticides which are harmful to the environment and people in general should be deregistered ASAP in all member states.
- ❖ Data requirements for pesticides registration. a) Designated area to conduct residue trials to set Maximum Residue Limits. b) Information sharing thus, including confidential business information.

Question 3: Which measures should be put in place for LMIC countries to domesticate the guidelines and which institutions should be involved?

MEASURES TO PUT IN PLACE FOR LMIC COUNTRIES

Set up a regional fund which should help set up and kick start the offices, laboratories, train staff and mobilization of activities.

A regional fund maybe facilitated through SAPRef needs to be put into place to fund the implementation of the guidelines in the country with a focus on standardising across the region instead of in countries.

The ministry of health should focus on enforcement and Eswatini Environmental Authority on the legislation.

Consultations with local stakeholders; review of subsidiary legislation to incorporate regional expectations, and public awareness. Institutions to be involved are; pesticides regulatory bodies, pesticide industry, national environmental affairs institutions, public health institutions and relevant civil society groups.

Most LMIC countries do not have adequate funds and facilities to domesticate the guidelines (e.g. laboratories, training facilities).

The Departments that should lead on pesticide management should be: Agriculture, Health, Environment

LIC needs provision of funding to begin with to kick start the program and helping them to set up a self-sustained management and capacity improvement for already existing ones.

These guidelines can be domesticated provided institutions involved in pesticide regulation are involved. Clear structures should be put in place for the national pesticide registration scheme. Improvement of the level of information exchange across various sectors.

Reporting structures must be formed at all levels of governance from local up to National and then the Secretariat. Frequency of reporting as well as what to report on should be clear to remain relevant.

Extension officers to monitor and evaluate pesticide management. Awareness, education and training of community affected. Collaborative effort from various stakeholders.

Agree regionally what is required and hold the industry to pay for independent data production and analysis.

The measures which should be put in place to domesticate the guidelines in LMIC are to set up a regional fund which should help set up and kick start the offices, laboratories, train staff and mobilization of activities during the first years. A self-sustainable way of management of the activities should also be put in place by the Ministry of Agriculture, Environment and Health.

Steps/measures to domesticate the harmonized guideline: a) Familiarization of the Harmonized Guidelines to stakeholders. b) Development of a road map to provide guidance on the regulations that cover Harmonized Guidelines. c) Presentation of the road map that provides guidance to the responsible Ministries about the inclusion of Harmonized guidelines in the/law Regulations. d) Presentation of road map to other stakeholders engaged in pesticides to get their inputs. e) Regulatory impact assessment f) Draft of Regulations that include the aspect of Harmonized guidelines. g) Organize a national validation meeting to validate the content. h) Publish the Pesticide law/ Regulations in the Government Gazette.

Resources and Further Reading

1. SADC Guidelines on Pesticides Management and Risk Reduction (2019)
2. Code of Conduct on Pesticide Management (2015): http://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/Code/Annotated_Guidelines_2015
3. WHO Recommended Classification of Pesticides by Hazard and Guidelines to Classification (2019). <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>
4. FAO/WHO Guidelines on Good Labelling Practice for Pesticides (2015) <http://www.fao.org/3/a-i4854e.pdf>
5. FAO/WHO Guidelines on Highly Hazardous Pesticides (2016) <http://www.fao.org/3/a-i5566e.pdf>
6. UNECE Globally Harmonized System of Classification and Labelling of Chemicals (GHS) – seventh edition (2017). http://www.unece.org/trans/danger/publi/ghs/ghs_rev07/07files_e0.html

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). This Digest was produced by: Tatum Louw | Forum Administrator | lwxtat001@myuct.ac.za. Prof Andrea Rother | Forum Moderator | andrea.rother@uct.ac.za Acknowledgement: Financial assistance from the Swedish International Development Cooperation Agency (SIDA), has been arranged by the Swedish Chemicals Agency (Kem1)

