



October 14, 2015

Christian Schliemann
Business and Human Rights
European Center for Constitutional and Human Rights (ECCHR)
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D-10961 Berlin
Germany

Dear Mr. Schliemann,

On behalf of CropLife India and the plant science industry in India and the region, thank you for providing an opportunity to comment on the “Ad Hoc Monitoring Report” recently released by your organization and partners.

CropLife India continues its strong support of nationally and internationally-accepted best practices in the area of crop protection product management. This includes the Insecticides Act (1968) and Rules (1971) of India as well as the International Code of Conduct on Pesticide Management set forth by the Food and Agriculture Organization of the United Nations (FAO) and World Health Organization (WHO).

While the role of the International Code of Conduct on Pesticide Management is to establish voluntary standards of conduct for all public and private entities engaged in or associated with the management of pesticides, particularly where there is inadequate or no national legislation to regulate pesticides, India has a robust national legislation to regulate pesticides.

The Central Insecticides Board & Registration Committee (CIBRC) regulates the manufacture, sale, storage, transport and distribution of insecticides with a view to ensure safety to human beings or animals - as per the Insecticides Act (1968) and Insecticides Rules (1971). Labels and Leaflets are also strictly regulated as per Section 3 of the Insecticides Act and Chapter V of the Insecticides Rules (No. 16 to 20).

All manufacture of registered pesticides have to strictly adhere to the label and leaflet regulations and any deviation will be considered as misbranded and will attract severe penal actions. The regulator approves the labels and leaflets, and all manufacturers and importers are required to strictly use the approved label and leaflets on the packaging of their products. CropLife India member companies follow the law of the land and strictly adhere to the prescribed label and leaflet regulations.

CropLife India has been playing a key role in thought leadership while working closely with the Government of India, including regulators, on harmonization of Indian regulations with internationally-accepted regulations as per FAO/ WHO. Through this partnership, remarkable progress has been realized in terms of moving towards global harmonization on subjects like toxicology review, Crop Grouping Concept and also on label and leaflet regulations. The Ministry of Agriculture and

Farmers Welfare has been successfully engaging with the Indian plant science industry, particularly with CropLife India and its members, to frame regulations in line with internationally-accepted best practices in crop protection regulations.

We in CropLife India embrace our responsibility to promote the highest stewardship standards in agriculture throughout the nation. Along with our member companies, CropLife India regularly conducts farmer training and awareness programmes across the country on the importance of identifying and purchasing authentic crop protection products, safe transportation, responsible use and secure storage of crop protection products (including following label instructions), the use of personal protection equipment, and first aid.

Awareness programmes conducted by CropLife India and its member companies reached more than 7 million farmers in 2014. These farmers were spread across Jammu and Kashmir, Punjab, Himachal Pradesh, Haryana, Rajasthan, Uttar Pradesh, Gujarat, Madhya Pradesh, Maharashtra, Kerala, Tamil Nadu, Karnataka, Orissa, Jharkhand, West Bengal, Andhra Pradesh, Chhattisgarh, Telangana, and Bihar.

In addition to farmers, our awareness programmes helped build greater capacity in these important areas among a variety of other key stakeholders, including: pesticide dealers; school children in India's more rural areas; and State Government agriculture department officials.

CropLife India is also conducting special projects in the States of Andhra Pradesh, Bihar, and Gujarat on the responsible use of pesticides and container management. These projects are being conducted in conjunction with the Government of India's **Grow Safe Food** campaign and with the official support of the Department of Agriculture and Cooperation, Ministry of Agriculture & Farmers Welfare, Government of India.

The project targets around 6,000 farmers for season-long training on responsible use, including use of personal protective equipment (PPE), reading and following label & leaflet instructions, securing storage of pesticides, triple rinsing of pesticide containers, and safe disposal of empty containers. Field training on spraying machines and techniques, sprayer maintenance, triple rinsing, and PPE is also given to farmers. The training modules are comprised of:

- Need of Agricultural inputs and their Responsible Use
- Different Crops Cultivated in Kakinada Area – IPM
- Pests and Disease Management – Role of Chemicals
- Storage Pest Management
- Spraying Machines and Calculation of pesticide dosage
- Counterfeit and illegal pesticide products
- Beneficial insects in different crops and their understanding
- Chemical Pesticide Residues on crops and their impact
- Buying and Transportation of Pesticides
- Methods of Pesticides Storage Practices at home
- Management of Pesticides Leakage
- Usage of Pesticides – Impact of Human Body
- Usage of Pesticides – Security Aspects
- Awareness on Pesticides Poisoning
- Pesticides Poisoning- First Aid Methods
- Container Management – Triple Rinsing and handling used empty pesticide containers

A season-long regular farmers training on responsible use and secure storage is also being conducted in the Kurnool District (Adoni Mandal) and Andhra Pradesh, and has included work with more than 120,000 farmers in total since 2010. This programme aims to bring about attitudinal change among farmers to follow responsible practices while using crop protection products. The project yields engagement among farmers, pesticide dealers, school children, scientists and the local Government to provide training on responsible use of crop protection products and secure storage.

In conclusion, CropLife India would like to reiterate its strong support of and commitment to comply with internationally-accepted best practices and India national regulations in the area of crop protection product management.

On behalf of CropLife India, our industry and members, my sincere gratitude again for the opportunity to provide comment to this report.

Sincerely,

Mr. Gantakolla Srivastava
Chief Executive Officer
CropLife India