

Mr. Gantakolla Srivastava

Chief Executive Officer  
CropLife India

24<sup>th</sup> November 2015

Dear Mr Srivastava,

This letter is in response to CropLife India's letter dated October 14th 2015, that commented on the Ad-Hoc Monitoring Report submitted by a coalition of civil society organizations to the UN FAO. We shall address two subjects mentioned in these comments. First, the adherence of CropLife India member companies to Indian legal stipulations, in particular those regarding label and leaflet requirements. Second, the extent to which training is conducted by CropLife India. Finally we wish to comment on the fact that CropLife India did not adequately address the issue of access to personal protective equipment or monitoring of the health and environmental impacts of pesticide use.

In their comments CropLife India made the claim that "India has a robust national legislation to regulate pesticides." The comments attempted to demonstrate this by mentioning India's Central Insecticide Board and Registration Committee and its proper regulation of all leaflets and labels. CropLife India also claimed that all its companies are in full compliance with Indian law. We would like to contest these two points.

First, arguably India's regulatory framework has many gaps and is insufficient in itself to ensure safe pesticide use. In any case, the assertion by CropLife India that it is in compliance with Indian law, appears to ignore the fact that this Ad Hoc Monitoring Report was submitted to the UN FAO regarding violations of the FAO/WHO Code of Conduct on Pesticide management. Therefore, while the report indicates that company members of CropLife India may indeed not be fully compliant with Indian legislation on pesticides, CropLife India did not provide any explanation of how its members adhere to the provisions of the FAO Code of Conduct. Moreover, according to CropLife International its member companies fully support the Code of Conduct. Adherence to the Code of Conduct is actually a condition of membership of CropLife International. Thus, even though the provisions therein may be deemed voluntary, member companies do have a duty to observe the requirements of the FAO Code of Conduct as per their own public commitment to do so. Second, it is clear that the Central Insecticide Board and Registration Committee cannot be relied upon to adequately enforce leaflet and label requirements, as evidenced by the grave violations that appear to take place in Punjab based on the findings of the Ad Hoc Monitoring Report.

Regarding training, CropLife India's comments described the group's efforts to conduct various levels of training across India. However, the findings in the Ad Hoc Monitoring Report clearly demonstrate that any training that is being conducted by either CropLife India or its companies is significantly lacking as no farmer interviewed had ever attended such a training by CropLife India, nor did most farmers seem aware of even basic safety principles that one would assume would be covered in such training. We would like to request more specific information on the exact areas in Punjab where such training has been conducted, how regularly these training sessions occur, and what aspects of environmental protection, health and safety are covered. Moreover, the special training projects

described in detail in the comments are currently taking place in Bihar, Gujarat and Andhra Pradesh only, which is not relevant to this Ad Hoc Monitoring Report which deals specifically with violations in Punjab.

In addition to training, the Ad Hoc Monitoring Report discussed extensively the lack of access to personal protective equipment (PPE) in Punjab which has not been addressed at all in Croplife India's response. We would therefore request that Croplife India provides information regarding what they deem to be appropriate PPE for the region, how many of the farmers using products of its member companies are using such PPE and how it is made available to the farmers.

Finally, we would like to highlight that given the inherent dangers of pesticides, regular and extensive monitoring of the health and environmental impacts of pesticides marketed by CropLife member companies is essential. This is even more crucial in the Punjabi context where concerns about inadequate labels as well as lack of personal protective equipment and training have been raised. CropLife India did not offer any insight into how the industry is ensuring that it receives the appropriate information. Such monitoring activity presents the only possibility of assessing whether the training efforts described by CropLife effectively serve the aim of reducing, and in the long run eliminating, the health and environmental problems described by farmers that are caused by pesticide use.

As we are committed to building a consultative dialogue, we would like to highlight that we deliberately chose to present this report to the FAO and raise awareness within this particular context. We therefore believe it is the appropriate forum for such a dialogue. We look forward to holding a meeting on the various issues raised in the report within the framework of the FAO mechanism as it guarantees the involvement of all actors and the discussion of a wide range of possible solutions including the possibility of avoiding pesticides entirely or only marketing pesticides that are not classified as highly hazardous.

We look forward to hearing from you and request that information relating to the above mentioned points is made publicly available in a timely manner in the hope of building a constructive discussion on the reality of the situation faced by the farming community in Punjab.

With best regards,

**For the coalition:**

*François Meienberg*  
Berne Declaration

*Christian Schliemann*  
European Center for Constitutional  
& Human Rights

*Umendra Dutt*  
Kheti Virasat Mission



*Sarojini V. Rengam*  
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