

Proceeding of the Emergency meeting (Virtual) on Pesticide Ban organized by the Indian Phytopathological Society (IPS) on 4th June, 2020

Draft Order "Banning of Insecticides Order, 2020" notified on 14 May, 2020 and published by the Ministry of Agriculture & Farmers Welfare wherein 27 pesticides are proposed to be banned raised a huge concern among the Plant Protection Scientists, Director of IARI, and other ICAR Institutes, farmers and many stake holders. An emergency meeting was called on advice of relevant authorities in IARI and TASS to discuss the fall out of the ban of 27 pesticides from use in Indian Agriculture and to form a view for raising our concern to Govt., within a stipulated period. The Virtual meeting had to be convened hurriedly under the aegis of IPS under chairmanship of President, Indian Phytopathological Society (IPS), with readily available members mostly based in New Delhi and few members outside N. Delhi. Following scientists attended the meeting.

1. Dr. P. K. Chakrabarty, President, IPS
2. Dr. Pratibha Sharma, President (Elect), IPS
3. Dr. Robin Gogoi, Secretary, IPS
4. Dr. Kalyan K. Mondal, Joint Secretary, IPS
5. Dr. Malkhan Singh Gurjar, Treasurer, IPS
6. Dr. Rashmi Aggarwal, Ex-Officio, Head (Plant Pathology) & Dean, Jt. Director (Edu), IARI
7. Dr. Anupama Singh, Head, Div. of Agri. Chemicals, IARI, New Delhi
8. Dr. Sujoy Saha, Pr. Scientist, ICAR-NRC on Grapes, Pune
9. Dr. M. S. Saharan, Pr. Scientist, Div. of Plant Pathology, IARI, New Delhi
10. Dr. Subhash Chandra, Professor, Div. of Entomology, IARI, New Delhi
11. Dr. Mukesh Dhillon, Pr. Scientist, Div. of Entomology, IARI, New Delhi

Dr. P. Chowdappa, former Director CPCRI, Kasargod; Dr. Jyotsna Sharma, Director ICAR-NRCP, Solapur, Dr. S.C. Dubey, Head Plant Quarantine, ICAR-NBPGR and Dr. K. K. Sharma, Coordinator AINP-PR, IARI New Delhi could not join the meeting due to their prior engagements.

The members after threadbare discussion arrived at the following points that were decided to be placed before the MoA & FW, GoI, for urgent considerations. The EC member may please give their views. If agreed on the draft we may send the following draft to JS (PP), DAC&FW on behalf of IPS.

It is also decided that we may have a wide encompassing meeting on the subject later at a time convenient to all IPS members. The following note needs to be submitted before expiry of 45 days from the date of publication of notification. Thus the emergency meeting was held.



(Robin Gogoi)

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Subject: Suggestions in respect of the Draft Notification “Banning of Insecticides Order 2020

Ref: SO 1512(E) File No 13035/15/2019-PP-1 dated 14th May 2020

Agriculture is the mainstay of 55% of population in the country, directly or indirectly. At a time when pandemic of Covid-19 unleashed an unprecedented loss of human life and economy, Agriculture sector of the country showed a resilience. Even during this difficult time the agriculture sector, perhaps the only sector managed to withstand the crisis and registered an all-time high food grain production of 298 million tons and horticultural production of 318 million tons. This could be possible through judicious use of agrochemicals with other Good Agricultural Practices (GAP). CABI/ FAO pegs global burden of crop loss due to pests and diseases between 20-40%. The statistics holds equally good for India where modest estimate shows an overall crop loss of 20-25% due to pests and diseases. Lack of effective crop protection has the possibility of discounting country's food grain production on an average by 65 million tons and horticultural production by 70 million tons at the present rate of loss, significant enough to pose a challenge to food and nutritional security of country's population. In view of this direct ban of 27 commonly used pesticides without a careful and serious thought could be detrimental to Indian Agriculture and deprive farmers of commonly affordable and effective chemistries.

Out of about 295 pesticides registered in the country, hardly around 100 pesticides are commonly used in agriculture, barring those that are banned, restricted or are outdated. Ban of 27 commonly used effective pesticides, including some of the pesticides recently approved by Govt. for locust control, altogether at one go without careful considerations will deprive farmers of affordable tools, detrimentally affecting cost of cultivation and the challenge of doubling farmer's income.

Indian Phytopathological Society, a professional Plant Protection Society of the country, founded in 1947 and based in IARI, New Delhi, endorses following views for consideration of DAC&FW, to help sustain agricultural production and productivity besides, supporting farmers livelihood:

1. Pesticides are registered by CIBRC at the first instance after careful scrutiny of data on Chemistry, toxicity and bio efficacy. If used as per prescribed Good Agricultural practices (GAP), they are neither expected to exceed the crop specific MRL fixed by the FSSAI, nor cause any fatality to human beings or animals.

2. Apparently only 27 pesticides comprising 8 fungicides, 12 insecticides and 7 herbicides are banned. But along with them goes 134 formulations containing these molecules that are registered for use on 74 important field and horticultural crops, sustaining their production. These formulations are registered to protect the crops against a broad spectrum of foliar and root diseases, insect pests and weeds of economically important crops, sustaining food security of the country. Some of them are also used effectively against household pests and vectors of human diseases.

3. Besides registered use, off-label use of many of these pesticides have been documented under MPRNL (Central Sector Scheme of DAC&FW). It is worthwhile to mention here that as per grouping of crops grown in India, in line with the codex classification, there are altogether 554 crops/ commodities. These include high value, low volume crops like spices and other

important crops including vegetables, fruits, herbs, specialty crops, minor millets and oil seed crops, pulses etc., all of which suffer significant loss due to pests and diseases. But not all of them are covered under registered use of plant protection chemicals. Farmers may often use some of these chemicals for pest management as off-label use, adding to the volumes of pesticides used that remain undocumented. To tackle the issues, Govt has already approved the crop groups and guidelines for label expansion and recognition of group MRL submitted by the sub-committee constituted by the RC, its 400th meeting.

Twenty seven (27) pesticides notified for ban were reviewed by AVC and where placed under group 3, where the candidate pesticides were to continue subject to review". The five major reasons cited in the draft notification in support of their ban are:

- a. **Endocrine disruption properties:** Most of the countries in the world are in disagreement with EU in banning pesticides on **hazard basis** as against the usual international norms of biosafety assessment for pesticides done based on **risk basis**. Even Codex Alimentarius Commission and Codex Committee on Pesticides Resistance (CCPR) a body constituted by FAO and WHO, continues to assess biosafety and approve pesticides, including those possessing endocrine disrupting (ED) properties, through risk based assessment, unlike that insisted by EU for pesticides having ED characteristics.
- b. **Ban in other countries:** No country is bound by an obligation to ban a pesticide because of its ban by another country. India has largest arable land of 140 million Hectare in the world. However, India has one of the lowest number of pesticides registered in the world (< 295) as against USA and China with about 700 and 550 chemistries, respectively. India is also perhaps the lowest user of pesticides (<600 g/Ha) in the world. Out of 27 pesticides notified, 11 have been shown to be banned by only 1-3 countries; one by six countries; and 11 by 27-37 countries. Needless to mention that other than China none of the other countries that banned these pesticides are agriculturally predominant economies.
- c. **Availability of alternative chemicals:** For longevity of pesticides or as a principle of resistance management, use of chemicals having different modes of action should be practiced in rotation. The argument that an alternative is available does not necessarily mean that an alternative with same mode of action as one being replaced is available.
- d. **Eco-toxicity or toxicity to honey bee/ aquatic organisms:** Many of the pesticides other the 27 notified pesticides, including newly registered chemistries and herbicides show some degrees of toxicity to honey bees and aquatic organisms. World over when the benefit outweigh risk, they are recommended and approved with conditions to avoid their use during active foraging period of the bees and also adjacent to ponds, paddy fields and water reservoir for safety to fish.
- e. **Additional data submission on bio-efficacy and toxicity:** Pesticides approved for use must conform with safety to human and environment. To uphold above tenet Indian Industry must honour and respect suggestions of the expert committees and provide additional data as recommended to support continuity of the products in question. However, often after recommendation of the experts, number of formalities are required to be completed before the suggested data as per the RC approved SOP could be developed. Thus, SOP for the suggested studies together with enabling conditions should be made available to Industries as soon as possible.
Also Industry may be asked to generate data for label expansion of pesticides on crop, where off- label use of above chemicals are documented by the Govt. Government has

already approved protocols for development of group MRL in the 400th meeting of RC. Label expansion with group MRL will help farmers use several new tools legally and facilitate Govt. to curb off label use of pesticides by farmers in the country.

In light of above, Indian Phytopathological Society, IARI, New Delhi, a registered Society working for the cause of sustainable agriculture development and increasing farmers livelihood through effective plant protection, strongly recommends that the pesticides notified for ban may be put on hold till a thorough discussion with stake holders including academia, Industry, farmers/ representative and Govt. is held. The farmers should not be deprived of the effective and affordable agrochemicals for failure of the Industries to submit data within the stipulated time, for whatever reasons, that may be assessed by DAC&FW.