

Comments and suggestion for change for the RSPO P&C Review: Draft Revised RSPO Principles and Criteria for Public Consultation: 1 October –30 November 2012

By Berne Declaration (Switzerland) and the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF)

Principles and Criteria as proposed	Suggested changes by the Berne Declaration (in red)	Reasons for suggested changes
<p>4.6 Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives, and this is documented.</p>	<p>Agrochemicals are used in a way that does not endanger health or the environment.</p> <p>There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p><u>Pesticides that are classified as World Health Organisation Class Ia or Ib, or are listed by the Stockholm, the Rotterdam Conventions and the Montreal Protocol, and Paraquat are eliminated by the end of 2013. Where other highly hazardous agrochemicals (see indicator 4.6.3.) are used, growers actively substitute those by least toxic alternatives. The substitution process is documented.</u></p>	<p>It is necessary to differentiate between pesticides. As in other criteria for agricultural production Agrochemicals classified as World Health Organisation Class Ia or Ib, or are listed by the Stockholm or Rotterdam Conventions, and Paraquat have to be banned in the near future. For other highly hazardous Agrochemicals a longer phase out period could be taken into account.</p> <p>The current criteria '<i>growers are actively seeking to identify alternatives</i>' is very weak, as no binding phase out is required for any pesticide. This wording in the RSPO P&C is much behind other standard setting organizations such as the Rainforest Alliance or FSC.</p>

Proposed indicator		Suggested changes by the Berne Declaration (in red)	Reasons for suggested changes
4.6.1	Justification of all agrochemical use shall be demonstrated.	<u>Control of pests, pathogens and weeds should only be conducted when damage thresholds are exceeded. This shall be demonstrated and made publicly available.</u>	The proposed indicator is too general. Control of pests, pathogens and weeds should only be implemented when damage thresholds are exceeded. Making this publicly available would allow a cross-check by pest/weed scientist and public interest groups and thus increase the incentive for a better scientific quality of the justification.
4.6.2	Records of pesticide use (including active ingredients used, area treated, amount applied per ha and number of applications) shall be demonstrated.	Records of pesticide use (including <u>pests/weeds/pathogens</u> , name of active ingredients <u>and specific formulations</u> used, area <u>treated</u> , amount of <u>formulations</u> and active ingredients applied per ha and number of applications) shall be demonstrated <u>and made publicly available.</u>	In order to identify key species and potentially upcoming resistance issues the controlled species should be recorded. In practice users deal with specific formulations (products) and it is more pragmatic to record formulation names and amounts. This is also helpful to avoid (and identify!) calculation errors when amounts active ingredients are recorded/summarized.

<p>4.6.3</p>	<p>Documentary evidence that use of Chemicals categorised as World Health Organisation Type 1A or 1B, or listed by the Stockholm or Rotterdam Conventions, and paraquat, shall be minimised and/or eliminated, and shall only be used in exceptional circumstances in accordance with IPM plans.</p>	<p>Documentary evidence that use of Chemicals <u>classified</u> as World Health Organisation <u>Class</u> Ia* or Ib*, or listed by the Stockholm* or Rotterdam* Conventions or in the <u>Montreal Protocol*</u> and Paraquat is <u>eliminated by the end of 2013</u>. <u>Pesticide active ingredients and their formulations that are included in carcinogenicity Categories 1A** and 1B** of the GHS¹, or in mutagenicity Categories 1A** and 1B** of the GHS or in reproductive toxicity Categories 1A** and 1B** of the GHS, will be eliminated within five year after certification and minimized in the meanwhile.</u></p>	<p>RSPO as a so called “sustainability” standard should follow international objectives and developments: The FAO aims at a progressive ban of pesticide with certain hazards (indicated with one * or two **) and the EU excludes pesticides with certain hazards (indicated with two**) from authorization². It still makes sense to differentiate between pesticides in the timing for phase-out.</p> <p>The term “shall be minimised and/or eliminated” does not make a lot of sense. A sustainability criteria as the RSPO can’t be indifferent if this highly problematic pesticides are banned or just minimized.</p> <p>Sri Lanka has successfully banned all WHO Ia and Ib pesticides and most paraquat formulations.</p> <p>The EU and Switzerland and many other countries have banned Paraquat, due to health constraints.</p> <p>In 2014, all current registrations and production permits of paraquat SL (soluble liquid) and mixed paraquat SL will be canceled in China, and all products of paraquat SL are forbidden to sell and apply in China after July 1, 2016.</p> <p>The study of the Berne Declaration “Goodbye Paraquat” (http://www.evb.ch/en/p25015110.html) shows that many palmoil producers have phased out use of paraquat. Recent figures say that 50% of palmoilgrowers abandoned Paraquat use.</p> <p>Many other labels such as the Rainforest Alliance, FSC and UTZ Certified have successfully implemented a Paraquat ban:</p> <p>http://www.evb.ch/en/p8883.html</p> <p>In order to find and implement non-chemical and least toxic alternatives, a five-year phase-out period should be allowed for all other highly hazardous pesticides, for which the phase out is not required by 2013.</p>
<p>¹ Globally Harmonized System</p> <p>² European Commission (2009): Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC.</p>			

<p>4.6.4</p>	<p>Use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. However, measures to avoid the development of resistance (such as pesticide rotations) shall be applied.</p>	<p>Use of selective products and agricultural methods that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. However, measures to avoid the development of resistance (such as pesticide rotations <u>and non-chemical pest management</u>) shall be applied.</p>	<p>It's obvious that also non-chemical pest management are an important tool to fight the resistance problem.</p>
<p>4.6.5</p>	<p>Chemicals shall only be applied by qualified persons who have received the necessary training and should always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Also (see criterion 4.7) on health and safety.</p>	<p><u>Pesticides</u> shall only be applied by qualified persons who have received the necessary training. <u>Training should be repeated every three years and when new application equipment or techniques are introduced.</u> Pesticides should always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided, used <u>and monthly controlled.</u> All precautions attached to the products shall be properly observed, applied, and understood by workers. Also (see criterion 4.7) on health and safety.</p>	<p>Training and education of pesticide users must continue and kept up to date, especially when new equipment is introduced. Therefore continued learning should be an indicator for staff qualification.</p> <p>Personal protective equipment (PPE) and spraying equipment can be easily damaged, and then miss its objective. It must be regularly controlled by the management.</p>

4.6.6	Storage of all chemicals shall be according to recognised best practices as prescribed in FAO or GIFAP Code of Practice (see Annex 1). All chemical containers shall be properly disposed of and not used for other purposes (see criterion 5.3).		
4.6.7	Application of pesticides by proven methods that minimise risk and impacts. Pesticides are applied aerially only where there is a documented justification.	<p>Application of pesticides by proven methods that minimise risk and impacts.</p> <p><u>Pesticides labeled 'Very toxic in contact with skin'/ 'Fatal in contact with skin.' or 'Toxic in contact with skin' shall not be applied using backpack sprayers.</u></p> <p><u>Aerial applications are conducted only in documented large scale emergency cases (sudden, unexpected occurrence of large pest populations). Only approved biological agents (e.g. entomophagus fungi, baculoviruses, specific Bacillus species) shall be applied aerially.</u></p>	<p>Studies have shown that backpack sprayers are frequently leaking - only 48% of over 8.500 users interviewed in 26 countries reported that their sprayers had never leaked³.</p> <p>Under proper IPM focusing on the prevention of pest outbreaks aerial applications should be redundant. However, sudden unexpected population of pests may occur, and may need aerial treatment. Therefore aerial applications should be restricted to those cases. In order to avoid side effects on habitats and beneficial organism, only specific biological agents should be used for aerial control.</p>

³ Matthews GA (2008): Attitudes and behaviours regarding use of crop protection products—A survey of more than 8500 smallholders in 26 countries. Crop Protection (27):834–846.

4.6.8	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see criterion 4.8).		
4.6.9	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated . Also (see criterion 5.3) on waste disposal.		
4.6.10	Specific annual medical surveillance for pesticide operators, and documented action to eliminate adverse effects shall be demonstrated.	<p><u>Free transportation to a physician for all workers handling pesticides, regardless their status as contract workers, smallholders or staff shall be provided.</u></p> <p><u>A free health insurance shall be provided to all workers handling pesticides, regardless their status as contract workers, smallholders or staff.</u></p> <p>Specific annual medical surveillance for pesticide operators <u>by a physician educated in pesticide poisoning effects</u>, and documented action to eliminate adverse effects shall be demonstrated.</p>	<p>Plantation workers often live far away from the next physician and lack of transport hinders appropriate timely treatment.</p> <p>Usage of pesticide is a risk to the health of the user and negative side effects can often not be avoided. To ensure that workers can seek free medical aid and get compensation for sick days a health insurance system shall be established.</p> <p>Diagnosis and treatment of health effects of pesticides require specifically trained physicians.</p>

4.6.11	There shall be no work with pesticides for pregnant or and breast-feeding women.	There shall be no work with pesticides for pregnant or breast-feeding women. <u>Pregnant or breast-feeding women shall receive a task in line with their situation. The wages must be paid in full during this periods.</u>	
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