DISCUSSION 1 DIGEST

Topic of Discussion:  The role and importance of national and regional Highly Hazardous Pesticides strategies

INTRODUCTION

The need for action on highly hazardous pesticides (HHPs) has received attention in various international forums, including the governing bodies of FAO and WHO, the stakeholders of the Strategic Approach to International Chemicals Management (SAICM) - which include FAO, UNEP and WHO - as well as through some of the activities undertaken under the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade and the Stockholm Convention on Persistent Organic Pollutants. The **FAO/WHO code of conduct on Pesticides Management (2014)** calls for actions to address HHPs, particularly in articles 3.6, 6.1.1, 7.5 and 9.4.1. Furthermore, the **FAO/WHO guidelines on HHPs (2016)** offer guidance to national and regional pesticide regulators on how to address HHPs. A strategy to address HHPs in the context of SAICM was also developed and adopted by SAICM.

While HHPs’ risk reduction requires a multi-stakeholder and multi-sectoral approach, the primary responsibility of pesticide risk reduction lies with lawmakers, i.e., national, and regional pesticide regulators. These institutions are the ones responsible for making decisions on whether a HHP should be used in a country or region. At the national level, most countries, particularly low- and middle-income countries are faced with several challenges in managing risks posed by pesticides. These challenges include: risks’ assessments; post-registration surveillance and monitoring of pesticides use; pesticide policies and legislations; information sharing and awareness; competing interests of different stakeholders; limited resources; compliance and enforcement, etc. These challenges also extend at the regional level due to the increased intra and extra trade among regional bodies. Many countries are harmonizing their pesticide legislations, policies, and pesticide registration schemes to remain competitive in the international market, improve trade and protect their population and the environment. The challenges of pesticides’ risks management thus call for good strategies at national and regional levels to reduce the risks posed by HHPs and to protect people’s health and the environment.

ABOUT THE PRESENTERS

**Fredrick Otieno** is a project officer at the Centre for Environmental Justice and Development (CEJAD), a public interest organization based in Kenya promoting sound chemicals and wastes’ management.

**Mark Davis** is an independent consultant specializing in pesticide management and sustainable agriculture. He worked for 17 years with FAO successively leading the field programme on obsolete pesticides, the Pesticide Management Unit, Climate Change Strategy and the Environmental and Social Risk Management Unit.

### 2022 DISCUSSION 1 ATTENDANCE BREAKDOWN

**Regional Representation**

- **Asia-Pacific**: 6%
- **Latin America and Caribbean**: 9%
- **Western European and Others Group**: 37%
- **Other**: 1%

**Sector Representation**

- **Government**: 30%
- **Private sector**: 24%
- **Academia**: 9%
- **Intergovernmental organisations**: 16%
- **NGO**: 21%

KEY:

- **IGO's**: Intergovernmental organisations
- **NGOs**: Non-governmental organisations

**Issue**: 1 of 2022

**Discussion date**: 18 May 2022

**DISCUSSION 1 ATTENDANCE BREAKDOWN**

**TOTAL ATTENDEES**: 89

**Female**: 51

**Male**: 34

**Other**: 4
From this discussion, the following key points were discussed and should be addressed and incorporated into the international discussions and work on HHPs:

1. There is strong and growing evidence that banning HHPs can significantly reduce the number of suicides without negatively impacting agricultural yield.

2. National and regional strategies are needed to effectively address the risks posed by HHPs. They can facilitate information sharing, sharing of resources (expertise and financial), stakeholder engagements as well as collaboration and cooperation in HHPs’ risk reduction efforts.

3. National and regional strategies should primarily be aimed at pesticide regulators, policy and law makers, pesticide producers, importers, vendors, and farmers as well as other users of pesticides.

4. A strategy to address the risks posed by HHPs is still lacking in most countries and regions. Countries and regional bodies should be supported to develop strategies on HHPs.

5. Involvement and engagement of stakeholders is key to developing and implementing an HHP strategy.

6. Important elements of a good HHPs strategy include:
   a. Clearly defining its purpose, vision, goal, and targets.
   b. Identifying stakeholders and clearly defining their roles.
   c. Indicating timelines for implementation.
   d. Identifying gaps and challenges linked to managing pesticides.
   e. Having an implementation plan.
   f. Defining precise mechanism of implementation.
   g. Defining accurate indicators for monitoring progress.
   h. Identifying mechanisms for monitoring and evaluating progress.
   i. Addressing HHPs throughout their life cycle.

7. Stakeholders that should be involved in developing and implementing strategies on HHPs include:
   a. Regulatory agencies
   b. Relevant government ministries
   c. Farmers’ organizations and networks
   d. Academia and research institutions
   e. Civil society organizations (CSOs)
   f. Agricultural extension services
   g. Public health advisory services
   h. Health services and poison control centres
   i. Trade unions
   j. Industry
   k. Human rights organizations
   l. Agricultural worker’s organizations

8. Factors critical to the success of an HHPs strategy include:
   a. Public consultations and stakeholder involvement should be structured to ensure buy-in.
   b. There should be a framework for monitoring and evaluating successes and outcomes.
   c. There needs to be positive political will to phase-out HHPs and upscale alternatives.
   d. There should be strong multi-stakeholder coordination mechanisms
   e. The roles and responsibilities of institutions and stakeholders in implementing the strategy should be well defined.
   f. Resources for implementing the strategy should be available.
   g. Stakeholders should be trained and sensitized on the effects of HHPs and available alternatives.
   h. Strong pesticides legislations are needed and must be effectively enforced.
   i. Alternatives should be available, safe, and cost-effective.

For a more detailed summary of the discussion, see the Annex below.
ANNEX

**DETAILED SUMMARY OF DISCUSSION 1 2022:**

**Disclaimer:** The information in this digest represents the opinions of members participating from different stakeholder groups expressed during the discussion. The views expressed in this document do not necessarily represent the opinion or the stated policy of the United Nations Environment Programme, the SAICM Secretariat, the GEF or UCT, nor does citing of trade names or commercial processes constitute endorsement.

THE DISCUSSION WAS STRUCTURED AROUND THREE QUESTIONS AND THE KEY DISCUSSION POINTS ARE PRESENTED UNDER EACH QUESTION.

**Question 1: Are national or regional strategies important to address HHPs effectively?**

<table>
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<tr>
<th>Sector</th>
<th>Participant responses</th>
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| NGO        | ➢ There is growing evidence that banning HHPs could result in a reduction in the overall suicide rate, especially where most of the suicides are linked to pesticides.  
            | ➢ Both national and regional strategies are important as trading across countries' borders takes place. There should be a “one for all and all for one” approach.  
            | ➢ National or regional strategies are important in consolidating HHPs’ risk reduction efforts.  
            | ➢ Regional strategies are very helpful. However, of concern, is whether there is global support for action on HHPs. Of interest is what FAO and other UN agencies/mechanisms are doing on a global level.  
            | ➢ Although there is a policy framework for the pesticide registration system, registration schemes are poorly functioning as they are affected by limited human and financial resources and lack sufficient capacity to assess risks.  
            | ➢ The effectiveness of regional and national strategies can be amplified when they are integrated into a global strategy to phase-out HHPs.  
            | ➢ Both national and regional strategies are essential. If a regional strategy is approved, countries will need to endorse it at the national level and make it legally binding to ensure better implementation. |
| Private    | ➢ The root cause of this phenomenon is not the availability of these pesticides per se.  
            | ➢ A written strategy is important.  
            | ➢ Regional strategies will be more effective.  
            | ➢ The short answer is yes, it is important, but long-term concerted action is important for it to succeed, bearing in mind that all stakeholders need to embark on a learning journey.  
            | ➢ The consideration of local agricultural conditions such as local crops, crop structure, use conditions, pest conditions, equipment used, clothing habits and risk awareness are crucial to making realistic risk-based decisions.  
            | ➢ Yes, it is important to have national and regional strategies that are workable and enforceable.  
            | ➢ As also outlined by the FAO managing HHPs should follow a stepwise approach, and here I see an important role for national and regional strategies to align on common ground.  
            | ➢ Both national and regional strategies are important – stakeholder engagements are crucial to ensure strategies are effective.  
            | ➢ Monitoring is essential, aligning monitoring aspects to national and regional strategies is a core part of the implementation strategy.  
            | ➢ The reality on the ground shows that additional hazards are pulled in to classify products as HHPs. Therefore, it can become challenging for regulators to remain informed. |
| Government | ➢ Regional collaboration is a suitable strategy to share ideas and resources: resources in terms of expertise and well knowledgeable personnel who understand the jargon and provide solutions when there is a need.  
            | ➢ Both national and regional strategies are important to address HHPs as it is a global environmental and health issue.  
            | ➢ Regional strategies are important and should begin at the time of registration of all pesticides. However, if the pesticide is classified as an HHP, it should not be registered.  
            | ➢ A strategy to address HHPs locally and regionally is important. It is particularly important for regions that are aiming to harmonize pesticide registration. However, for it to be effective, it |
cannot remain as a policy alone but should be legislated as part of the laws that govern pesticides in the countries.

- Both national and regional strategies must be developed to combat HHPs. For example, national strategies can address unique problems, but communication at the regional level can ensure success.
- Regional strategies can create awareness among country members on HHPs and assist in sharing information on the approaches needed to combat it.
- National and regional strategies are key to sustainable HHPs risk reduction. This strategy will enable the inclusion of all relevant stakeholders.
- National strategies are important to address HHPs effectively and for the sustainable elimination of thereof. However, generally, regional strategies are more desirable

**Academica**

- Both are important but regional strategies may be slower to develop and implement and can benefit individual countries who have already legislated reductions and implemented changes. However, regional, and national strategies can be seen as two tiers to a final objective.
- Although strategies are important, they are not enforced.
- Cooperation is needed between national authorities/institutions and FAO, WHO, etc.
- Yes, they are to communicate the risks of HHPs, countrywide advocacy for farmers, gardeners, orchard owners and the public (e.g., on national TVs and radios, the risks, and problems of HHPs for human and wildlife health should be communicated).
- Closer relationships and cooperation between scientists in academia, research institutes and government agencies should be formed to advocate the risks imposed on local classes and sensitive groups like pesticide/agri workers, pregnant mothers, and children.

### Additional information on HHPs linked to Suicide

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<th>Commentary on HHPs and Suicide</th>
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<td>Many WHO class 2 pesticides appear to have shown high lethality in some countries and their classification may need to be adjusted.</td>
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<td>Preventing people from attempting suicide is extremely difficult because of the many reasons behind this. What is much more achievable is reducing access to the most lethal means, so that those suicide attempts are not successful. In most cases, the evidence shows a repeat attempt is not made.</td>
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<td>Evidence from countries is partly published, partly unpublished or anecdotal. The evidence will need to be collated properly and systematic analysis is undertaken.</td>
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<td>FAO specifications are a point of reference for stakeholders working with pesticides especially at the ministry of agriculture and the ministry of environment especially as far as registration is concerned. In addition, they serve as guiding materials for the whole pesticide management cycle.</td>
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<td>There is no WHO estimate available for the number of pesticide poisoning incidents which occur. It is very difficult to systematically collate data on this. Better data are available to estimate the number of self-poisoning cases.</td>
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<td>Evidence suggests that once the immediate crisis is over, if a person survives a suicide attempt, in general, they do not then go and attempt suicide by another mean. Therefore, removing highly toxic pesticides reduces overall suicide rate.</td>
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<td>Eliminating the availability of HHPs not only has an impact on reducing suicide but is also key to reducing the millions of unintentional poisoning cases from which farmers suffer yearly.</td>
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<td>A recent systematic review of unintentional acute pesticide poisoning estimated that 44% of farmers suffer unintentional acute pesticide poisoning every year.</td>
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<td>Of interest is whether there is a way to collect and reconcile available data on poisoning incidents. For example, FAO estimates 570 million farmers worldwide, and 385 million accidents per year implying that nearly 70% of farmers experience pesticide poisoning each year. If the figures are unrealistic, it becomes difficult to ensure support for national and international action.</td>
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**Question 2:** What are some of the key elements a good strategy should have to reduce the risks posed by HHPs?

**KEY STAKEHOLDERS**
- Good strategies should involve key stakeholders.
- HHPs regulation requires different stakeholders. Therefore, the question is: “how is it harmonized in strategies?”.
- Stakeholder engagement in strategy development and implementation is strongly recommended by all organizations and needs to be an integral part of the process.
- At its core, a good strategy involves stakeholder involvement.

**NEEDS ASSESSMENT**
- It is important to have provisions in the strategy for conducting needs’ assessment that will establish the extent to which a product is required for its current use, and whether alternative approaches or products that present less risk are effective, less hazardous, and more available.

**CLEAR VISION**
- Good strategies should, among other things, a clear vision regarding the required financial and technical resources for the implementation, key stakeholder groups, capacity needs, and a living list of available safer alternatives.

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**Resources shared**

- Preventing suicide: a resource for pesticide registrars and regulators: [https://www.who.int/publications/i/item/9789241516389](https://www.who.int/publications/i/item/9789241516389)
- LIVE LIFE: An implementation guide for suicide prevention in countries: [https://www.who.int/publications/i/item/9789240026629](https://www.who.int/publications/i/item/9789240026629)
- Preventing suicide: A global imperative: [https://www.who.int/publications/i/item/9789241564779](https://www.who.int/publications/i/item/9789241564779)
- The global distribution of acute unintentional pesticide poisoning: estimations based on a systematic review: [https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-09939-0](https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-09939-0)

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**Poll 1:** Do you think it is important to have a strategy to address HHPs? (N=38)
- **Yes**
  - 95%
- **Not sure**
  - 5%

**Poll 2:** Which groups/bodies should a strategy on HHPs primarily be aimed at? (Chose up to 3): (N=40)
- 27% said **pesticide regulators**
- 21% said **farmers and other users of pesticides**
- 23% said **policy and law makers**
- 24% said **pesticide producers, importers, and vendors**
- 3% said **public and consumers**
- 2% said **food exporters, wholesalers, and retailers**

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**Question 2:** What are some of the key elements a good strategy should have to reduce the risks posed by HHPs?
### Poll 3: Does your country or region have a strategy on HHPs? (Yes/No and list country in your response) (N=24)

**Yes - 29%**, in:
- Malaysia, Iran, Zimbabwe, Zambia, Barbados

**No - 54%** in:
- Armenia, Mozambique, Caribbean Region, South Africa, Egypt, Tajikistan, Jamaica, Rwanda, Tanzania

**Don’t know/ Not sure - 17%** in:
- Eswatini, Kenya

### Poll 4: Mention elements of a good HHPs strategy? (Check all that apply) (N=29)

- 11% said **indicators for monitoring success**
- 10% said **well-defined purpose and clear vision and monitoring and evaluation framework** respectively.
- 9% said **action/implementation plan, timeline for implementation and roles of stakeholders clearly defined** respectively.
- 8% said **SMART objectives and life cycle approach to HHP management** respectively.
- 7% said **well-defined goal and identify gaps and challenges in pesticide management** respectively.
- 6% said **action oriented and well-defined mechanism of implementation** respectively.

### Question 3: What can influence the success of a HHPs’ strategy?

#### FACTORS THAT INFLUENCE THE SUCCESS OF HHP STRATEGIES

**Pesticide industries in LMICs**
- Pesticide corporations that make, promote, and export the HHPs to LMICs need serious global action to ensure they are looking for safer control methods. There is a need for stricter control on newly emerged pesticide corporations in Asia (China, India, etc.) and South American countries.

**Stakeholder involvement**
- Stakeholder support is important.
- Involvement from stakeholders during the planning and implementation is important.
- Local ownership of the strategy is important, for example, when stakeholders are actively and meaningfully involved in the process of developing a strategy, they will feel part of it and have the desire to implement it.
- Active participation from all stakeholders.

**Political will from policymakers**
- Lack of political will influences implementation and results in financial challenges towards it.
- Political will for strategy elaboration and implementation.
- Effective and efficient pesticide policies and legal frameworks.
- Buy-in to the strategy and implementation will be key. Along with monitoring.
- A national regulation banning the import of HHPs already banned in other countries or regions is important.
- Many factors can lead to the success of a strategy, however, ownership from leaders and implementers is key as leaders will provide the necessary resources while implementers will own every process.

**Awareness**
- Public awareness and education.
- Awareness-raising.
- Farmer code of conduct, behaviour change communication and education, and consumer demand
- HHPs strategies need to be person- (and farmer-), community-oriented, to provide them with safer means of work and life.

**Availability of alternatives**
- Where there is a ban on HHPs, there must be alternatives.
- Availability of effective, efficient, and affordable alternatives.
- The success of an HHPs strategy must be a clear reduction in harm. Therefore, a strategy must be outcome-oriented with clear targets, for example: defined reduction in HHPs on the market, reduction in...
pesticide poisonings, and reduction in environmental injustices (e.g., human rights harm and environmental pollution). Additionally, such a strategy should ensure that no regrettable substitution is made, but that HHPs are replaced with agroecological alternatives.

- Availability of alternatives and willingness of manufacturers to make products available at affordable prices.
- The success of the HHPs strategy depends on the availability of safer alternatives, including agroecological options. It is also essential to ensure financial and technical support for implementation.
- A harmonized approach to determine agronomic needs, including trade-off discussion and risk/benefit considerations.

Nature of hazard
- Clarity on the nature of the hazard and its relevance under regional conditions of use, for example, rodenticides in urban dwellings vs an anti-fouling agent in marine use.

Other
- Monitoring and evaluation mechanisms, etc.
- Relevant and necessary resources are needed to implement strategies.

Poll 5: Which Stakeholders should be involved in the development and implementation of the HHP strategy? (Check all that apply) (N=34)
- 11% said regulatory agencies and relevant government ministries respectively.
- 10% said farmers organizations and networks and academia and research institutions respectively.
- 9% said health services and poison control centres
- 8% said civil society organizations (CSOs), agricultural extension services, public health advisory services, agricultural worker’s organizations, and industry respectively.
- 5% said trade unions
- 4% said human rights organizations

Poll 6: What are the most important factors to ensure HHP strategies work? (N=35)
- 17% said public consultations and stakeholder involvement must be well structured and representing all the groups in communities to ensure buy-in of the strategies.
- 11% said monitoring and evaluation frameworks and political leadership willingness in phasing-out HHPs and upscaling alternatives respectively.
- 9% said strong multi-stakeholder coordination mechanisms, clear roles and responsibilities amongst agencies, resource availability, awareness raising and training of HHP harms to all stakeholders and strengthen pesticide legislation and ensuring its effective implementation and enforcement respectively.
- 6% said availability of alternatives that are affordable.
- 3% said involving private sector, informed by independent science (not industry), good communication and take in consideration a regional context and approach respectively.

Useful Resources:

1. FAO/WHO code of conduct on pesticides management (2014)
2. FAO/WHO guidelines on highly hazardous pesticides (2016)
3. International Conference on Chemicals Management (ICCM 4) resolution on Highly hazardous pesticides
4. Strategy to address highly hazardous pesticides in the context of the Strategic Approach to International Chemicals Management
5. UNEP Synthesis report on the health and environmental impacts of pesticides and fertilizers
6. Sri Lanka’s bans of WHO toxicity Class I (& some Class II) pesticides
7. Addressing highly hazardous pesticides I Mozambique
8. Media article: The case of banning hazardous pesticides

HHPs COP: The Secretariat of the Strategic Approach to International Chemicals Management (SAICM) and the Environmental Health Division at the University of Cape Town (UCT) created this Community of Practice (CoP) to foster online discussions and address key issues related to Highly Hazardous Pesticides (HHPs) among stakeholders from governments, international
organizations, industry, academia, and civil society. This CoP is contributing to the SAICM/GEF project on Emerging Chemicals Policy Issues Knowledge Management Component.

This activity is supported by the Global Environment Facility (GEF) project ID: 9771 on *Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)*.

Join the SAICM/UCT HHP CoP at: [https://saicmknowledge.org/community](https://saicmknowledge.org/community)

If you have any questions or require clarification on this initiative, please contact the SAICM Secretariat at saicm.chemicals@un.org or UCT at uctcops@outlook.com.