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| **Consultation document for Fairtrade Stakeholders:**  Monitoring Review of the Hazardous Materials List (HML) | |
| Consultation Period | 18.12.2019 – 27.01.2020 |
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**PART 1: Introduction**

Welcome to the consultation on the monitoring review of the Hazardous Materials List (HML).

Thank you for taking the time to participate. First you will find an introduction to the topic and consultation process and then you will be asked the consultation questions.

S&P will present the results of consultation along with S&P recommendations to the Standards Committee at its next meeting. The final changes in HML will be published succeeding its approval by the SC.

**General Introduction**

Fairtrade Standards support the sustainable development of small-scale producers and workers in the Global South. Producers and traders must meet applicable Fairtrade Standards for their products to be certified as Fairtrade. Within Fairtrade International, Standard & Pricing (S&P) is responsible for developing Fairtrade Standards. The procedure followed, as outlined in the [Standard Operating Procedure for the Development of Fairtrade Standards](https://files.fairtrade.net/standards/SOP_Development_Fairtrade_Standards.pdf) is designed in compliance with all requirements of the [ISEAL Code of Good Practice for Setting Social and Environmental Standards](https://www.isealalliance.org/get-involved/resources/iseal-codes-good-practice). This involves wide consultation with stakeholders to ensure that new and revised standards reflect Fairtrade International’s strategic objectives, are based on producers’ and traders’ realities and meet consumers’ expectations.

You are kindly invited to participate in the monitoring review of the Fairtrade Hazardous Materials List (HML). For this purpose, we kindly ask you to provide your input on the proposed changes suggested in this document and encourage you to give explanations, analysis and examples underlying your statements. All information we receive from respondents will be treated with care and kept confidential.

**Please submit your comments to** [**standards-pricing@fairtrade.net**](mailto:standards-pricing@fairtrade.net) **by 27January 2020.** If you have any questions regarding the draft standard or the consultation process, please contact [standards-pricing@fairtrade.net](mailto:standards-pricing@fairtrade.net)

Following the consultation round S&P will prepare a paper compiling the comments made, which will be emailed to all participants and also be available on our Fairtrade International website.

**Background and Objectives**

The revised Fairtrade Hazardous Materials List (HML) was published in January 2016 and became applicable as of January 1st, 2018. This list consists of chemicals and pesticides that are considered hazardous to the human health and to the environment and needs to be phased out or used under extreme caution.

The review process was supported by the Pesticide Action Network (PAN) and followed the approach on classification of highly hazardous pesticides, that considers the level of toxicity of each pesticide. The criteria used to classify agrochemicals were 1) pesticides prohibited by international conventions - (Persistent organic pollutant (POP): Stockholm Convention; Ozone depleting: Montreal Protocol; Listed in Prior Informed Consent list (PIC): Rotterdam Convention), 2) high toxicity (WHO Class 1a and 1b; Very toxic by inhalation (GHS classification), 3) hazard to human health (Carcinogenic, Repro-toxic, Mutagenic and Endocrine disruption), and 4) known hazards to the environment (very bio-accumulative; very persistent in water; soil or sediment; very toxic to aquatic organisms bio-accumulative and bee toxicity). Consequently, different weight to the different hazard evaluation criteria and the number of criteria met has been given.

Using the above mentioned criteria the agrochemicals have been classified in different categories according to their level of toxicity: Red List (prohibited from use on Fairtrade crops), Orange List (restricted list with specific conditions for use) and Yellow list (to be used under caution). As a result, in comparison to the previous version, called Prohibited Materials List, the number of pesticides in the red list increased from 124 in the previous version to 207. The orange list contains 39 pesticides which can only be used under specific conditions. The yellow list includes 110 hazardous pesticides which should be only used with extreme caution (compared to 58 previously). In addition, the derogation process, that was possible with the pervious List, was abolished. Agrochemicals for which derogations were available but in public consultation identified as irreplaceable in the short term - were listed in the orange list. Other criteria for classifying a material in the Orange List were – those substances that cause hazard to ecosystem services (highly toxic to bees) or materials that would be classified in Yellow List but were identified as of high concern to civil society. Some of the materials in the orange list were further categorized into 4 groups[[1]](#footnote-1) with different conditions that have to be fulfilled for using the pesticides. One of the categories, called ‘d’, identifies agrochemicals that have to be phased out by end of June 2020. The HML applies to all operators (including traders), and the intention was to monitor the use of the agrochemicals listed in the Orange List of HML in 2019.

**Therefore, following the last review of HML, Fairtrade is carrying out a monitoring review to align with recent research findings on the impact of agrochemicals on environment and human health and understand whether materials in Restricted list (Orange list) should be retained in this list or placed in the Prohibited List (Red List).**

**Project and Process Information**

This standard monitoring review project started in July 2019. The process information on this project can be found in the project assignment (PA) available at: <https://files.fairtrade.net/2019-11-05-ProjectAssignment-HML_EN_updated.pdf>

**Confidentiality**

All information we receive from respondents will be treated with care and kept confidential. Results of this consultation will only be communicated in aggregated form. All feedback will be analysed and used to draw up the final proposal. However, when analysing the data we need to know which responses are from producers, traders, licensees, etc. so we kindly ask you provide us with information about your organization.

**The target groups of this consultation are:**

* Hired Labour organizations, Small-scale Producer Organizations already certified or interested in becoming certified under the Fairtrade Standards.
* Licensees and traders certified / interested in becoming certified under the Fairtrade Standard for Small Producer Organisations.
* Producer Networks, National Fairtrade Organisations, Fairtrade International, FLOCERT, NGOs, researchers, etc.

**PART 2: Standard Consultation**

The consultation is organized into the following sections:

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## **Information about your organization**

Please complete the information below:

**Question 0.1** **Please provide us with information about your organization so that we can analyse the data precisely and contact you for clarifications if needed. The results of the survey will only be presented in an aggregated form and all respondents’ information will be kept confidential.**

Name of your organization *Click here to enter text*

Your name *Click here to enter text*

Your email *Click here to enter text*

Country *Click here to enter text*

FLO ID *Click here to enter text*

**Question 0.2. Are your responses based on your own personal opinion or is it a collective opinion representing your organization?**

Individual opinion

Collective opinion representing my organization/company

**Question 0.3.**  **What is your gender? (Note: this is for data analysis purposes only)**

Female

Male

**Question 0.4. What is your main responsibility in the supply chain?**

Producer

Exporter

Importer

Processor

Retailer

Licensee

Other (e.g. PN, NFO, FLOCERT, FI)

*Click here to enter text*

**Question 0.5. What is your main product?**

**\*Please select one product.**

**If you produce/trade multiple products please select the last option and provide more information in the comment box.**

Banana

Cane sugar

Cereals

Cocoa

Coffee

Fibre crops (including cotton)

Flowers and plants

Fresh fruit (other than banana)

Fruit juices

Herbs and Herbal teas & Spices

Nuts

Oilseeds and oleaginous fruits

Prepared and Preserved Fruit and Vegetables

Tea

Vegetables

Other or multiple products (please specify below)

*Click here to enter text*

## **Section 1. Materials in the Orange List, group ‘d’ (to be phased out by June 30, 2020)**

###### 1.1 Chlorothalonil, Beta-Cyfluthrin and Abamectin

In previous consultation on Hazardous Materials List in 2015, eight agrochemicals were classified into orange list, group ‘d’ with a specific condition – to phase out by end of December 2019. This deadline was later revised and replaced with June 30, 2020. Therefore, Fairtrade aims to prohibit the use of the following agrochemicals after June 2020 by moving them to red list: Chlorothalonil, Beta-Cyfluthrin, Abamectin, Carblosulfan, Dichlorvos/DDVP, Fenpropathrin, Lambda-cyhalothin, Oxamyl.

In the meantime, various stakeholders, representing interests of consumers as well as producers brought our attention to Chlorothalonil, Beta-Cyfluthrin and Abamectin, indicating either challenges to phase out these materials or risks if their further use would be allowed.

For example, some producers explain that chlorothalonil as one of the fungicides with multi-site actions is found to be effective in mixing/alternating with medium to high risk fungicides and fungal diseases do not become resistant to it ([source](http://www.phi-base.org/images/fracCodeList.pdf)). While at the consumer side, a hypermarket in Europe came up with a list of chemicals to be banned to answer to consumers’ conсerns. Among the banned pesticides there are chlorthalonil and beta-cyfluthrin ([source](https://media.kaufland.com/images/PPIM/AP_MarketingDocument/deu/27/12/Asset_3392712.pdf)). In addition, analysis of non-compliances since 2018, showed that there are some challenges to phase out these and other materials in this group. Overall these challenges and availability of alternatives at producer side vary between regions and products. Thus a more thorough analysis of this situation is necessary and your views will contribute to this understanding.

**The proposal in this section is to move all materials from orange list under category group ‘d’ to red list. In addition, there are questions that aim to gather a better understanding of challenges and existing alternatives for all materials that have to be phased out from use by end of June, 2020 and in particular aim to collect more detailed information on challenges phasing out Chlorothalonil, Beta-Cyfluthrin and Abamectin**.

**Please provide your feeback on 1 proposal and answer the questions for each of the agrochemicals**

**Porposal 1.1.1The following agrochemicals in Fairtrade HML document are currently listed in Orange list, group ‘d’, i.e. to phase out by June 30, 2020: Chlorothalonil, Beta-Cyfluthrin, Abamectin, Carblosulfan, Dichlorvos, DDVP, Fenpropathrin, Lambda-cyhalothin, Oxamyl**

**Do you agree that Fairtrade prohibits use of all agrochemicals in group ‘d’ after June 30, 2020?**

Yes

No.

Please list name of agrochemicals that are challenging:

No, all of these chemicals are challenging to phase out

Not relevant to me / I don’t know

**Please explain your rationale below**:

**Chlorothalonil**

*(examples of trade names of pesticides containing this active ingredient:* ***Bravo, Echo, Daconil, Biomet, Clortosip, Control 500, Dakota, Glider, Helmonil, RAV 500, Rova, Twigathalonil)***

**Question 1.1-2** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Chlorothalonil* ?**

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biofungicides;

Good field sanitation and post-harvest clean up;

Crop varieties resistant or tolerant of the pest/disease;

Enhanced crop rotation or intercropping;

Other good cultural or agronomic practices, e.g. management to avoid excess humidity in crop foliage which

can encourage more disease problems;

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify) *Click here to enter text*

**Question 1.1-3** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 1.1-4** **Please indicate the scope and frequency of use of pesticides/products containing Chlorothalonil**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Beta-Cyfluthrin**

*(one of the traded names of pesticides containing this active ingredient is* ***Bulldock)***

**Question 1.1-5** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Beta-Cyfluthrin*?**

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify) *Click here to enter text*

**Question 1.1-6** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 1.1-7** **Please indicate the scope and frequency of use of pesticides/products containing Beta-Cyfluthrin**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Abamectin**

*(examples of trade names of pesticides containing this active ingredient:* ***Avid 018 EC, Avirmec, Avoid, Bihopper, Catombe, Dynamenc, Vertimec)***

**Question 1.1-8** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Abamectin*?**

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify) *Click here to enter text*

**Question 1.1-9** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 1.1-10** **Please indicate the scope and frequency of use of pesticides/products containing Abamectin**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

###### 1.2 Other active ingredients listed in Orange List in group ‘d’

*Carblosulfan; Dichlorvos, DDVP; Fenpropathrin; Lambda-cyhalothin; Oxamyl.*

**Question 1.2.1 Do you know of any phase out challenges with any other Orange List active ingredient in group ‘d’ *(to be phased out by June 2020)* that needs to be addressed in this monitoring review?**

**If it is used by your members OR organization, please specify below for which pests/diseases and which crops and explain challenges.**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Nr.** | **Name of active ingredient of material**  *(from Orange List, group ‘d’)* | **Name of target organism**  *(pest/insect/plant (vegetation) OR disease);* | **Name of the crop on which it is applied** | **Scope and frequency of use** | **Alternatives available[[2]](#footnote-2)**  *(specify which alternatives are available)* | **Challenges for phase out2** |
| **1** |  |  |  |  |  |  |
| **2** |  |  |  |  |  |  |
| **3** |  |  |  |  |  |  |
| **4** |  |  |  |  |  |  |
| **5** |  |  |  |  |  |  |
| **6** |  |  |  |  |  |  |
| **7** |  |  |  |  |  |  |
| **8** |  |  |  |  |  |  |
| **9** |  |  |  |  |  |  |
| **10** |  |  |  |  |  |  |
| **11** |  |  |  |  |  |  |
| **12** |  |  |  |  |  |  |

## **Section 2. Neonicotinoids and other materials**

###### 2.1 Clothianidin, Imidacloprid, Thiamethoxam, Thiacloprid and Acetamiprid

There is a number of chemical and biological products that are used to protect plants against pests (animals, insects, plants, fungi, bacteria or viruses). However, the characteristics that make a pesticide efficient against pests, make it hazardous for humans, animals, and environment. For example, neonicotinoid insecticides applied to the soil, as foliar sprays or as seed treatments (their most widespread use), can affect natural enemies[[3]](#footnote-3) of insect pests. Further to this, recent field research provides evidence that these unintended side- effects can disrupt biological control in some situations, with economic consequences for farmers ([PANUK, 2017](https://issuu.com/pan-uk/docs/bee_factsheet_10?e=28041656/50789548)). In addition, according to recent publication, researchers are questioning whether neonicotinoids can be used as part of an Integrated Pest Management (IPM) programme or if they should be considered as incompatible with the use of naturally occurring or commercial biocontrol agents (PAN UK (2017).

The use of these pesticides, especially during the foraging period of the bees can cause severe damage to populations of pollinating insects. Honey bees’ and wild bees’ role as pollinators is one of the most important factors to ensure yield and quality of many fruit and vegetables and this is especially true for cross pollinated crops. 60 to 80% of the world’s flowering plant species are animal pollinated, and 35% of crop production and 60% of crop plant speciesdepend on animal pollinators.

Based on results of previous review of Fairtrade Hazardous Materials list, it was revealed that immediate prohibition of all bee toxic pesticides would be challenging for producers because suitable alternatives were not available at that time. Therefore, the seven insecticide chemicals[[4]](#footnote-4) identified by Greenpeace Germany as most harmful to bees were placed on the Orange List, and can only be used under circumstances where they do not pose a threat to bees, or where the threat is very minimal – i.e. under enclosed farming structures (such as greenhouses, where insects cannot easily enter), and only under very restricted conditions in open cultivation. Use of these pesticides is also prohibited during flowering season.

The EU has periodically banned the use of these pesticides due to these concerns and in 2017, Greenpeace has also advocated for the ban neonicotinoids. The reason is that on the basis of industry studies, the European Food Safety Authority confirmed that all authorised uses of imidacloprid and clothianidin pose a high risk to bees, or that a high risk cannot be excluded, and for thiametoxam there was not enough evidence to disprove its high environmental risk. Further to this, it was found that thiacloprid, presents endocrine disrupting properties[[5]](#footnote-5),[[6]](#footnote-6) and is classified as probably carcinogenic and toxic for the reproductive system, can represent a danger to bees and other insects. While another neonicotinoid, named acetamiprid was found to have a low risk to bees, highly toxic to birds and earthworms and moderately toxic to most aquatic organisms. According to studies, conditions of its use should include risk mitigation measures .

Among those 7 chemicals4, there are currently three materials that belong to the group of neonicotinoids and are in the Orange List while Thiacloprid is currently placed in Yellow List of Fairtrade HML.

|  |  |  |
| --- | --- | --- |
| ***Name of active ingredient of the material*** | ***Section in HML*** | ***Specific conditions under HML*** |
| ***Clothianidin*** | *orange list (restricted), group ‘b’* | * *Not to be used on young plant materials;* * *To be used only in greenhouse production;*   *OR*   * *In open field conditions, it is not used on gregariously flowering melliferous crops, starting one month prior to peak flowering and during flowering period. (e.g. coffee, fruit trees, cashew, almond etc.). The certification body will determine the crops which fall under this type.* |
| ***Imidacloprid*** |
| ***Thiamethoxam*** |
| ***Thiacloprid*** | *yellow list (to be used with caution)* |  |
| ***Acetamiprid*** | *currently not listed* |  |

Due to research findings and industry studies mentioned above, Fairtrade would like to strengthen the conditions under which these neonicotinoids can or cannot be used.

**The proposals in this section aim:**

**To change in the ‘specific conditions’ for use of highly toxic agrochemicals, e.g. Clothianidin, Imidacloprid and Thiamethoxam;**

**To restrict the use of Thiacloprid and Sulfoxaflor, by moving them from Yellow List of Fairtrade HML (i.e. materials to be used with caution) to Orange List (restricted materials)**

**To add Acetamiprid to Fairtrade Yellow list.**

**Please provide your feeback on the 3 proposals and answer the questions for each of the agrochemicals**

**Proposal 2.1.1**. **Currently, in Fairtrade HML document, Clothianidin, Imidacloprid and Thiamethoxam are categorized under group “b” of restricted materials list (i.e. Orange List) with further specific conditions for use:**

|  |
| --- |
| ***Details of specific conditions*** |
| * *Not to be used on young plant materials;* * *To be used only in greenhouse production;*   *OR*   * *In open field conditions, it is not used on gregariously flowering melliferous[[7]](#footnote-7) crops, starting one month prior to peak flowering and during flowering period. (e.g. coffee, fruit trees, cashew, almond etc.). The certification body will determine the crops which fall under this type.* |
|
|

Due to recent research findings, it is recommended by the European Commission[[8]](#footnote-8) that all outdoor uses of the three substances should be banned and only the use in permanent greenhouses can remain possible.

**Please select which of the options for change proposed below would you be in favour for Fairtrade to introduce for Clothianidin, Imidacloprid and Thiamethoxam:**

**Option 1:** Keep these materials listed in ‘Orange List’ and introduce change on specific conditions as displayed below. Please provide further rationale supporting your choice :

*Please note text in ‘red’ displays either deletion (if stroke through) or introduction of new change*

* *Not to be used on young plant materials;*
* *To be used only in permanent greenhouse production;*

*~~OR~~*

* *~~In open field conditions, it is not used on gregariously flowering melliferous crops, starting one month prior to peak flowering and during flowering period. (e.g. coffee, fruit trees, cashew, almond etc.). The certification body will determine the crops which fall under this type~~.*

**Option 2**: Move all three materials to prohibited list (Red list) including a transition period to phase them out.

**I have other proposal**, please specify here:

**Proposal 2.1.2** **According to recent research findings on Thiacloprid, this material has strong environmental impact and falls under category of endocrine disruptor.**

**Currently it is classified in Yellow List of Fairtrade HML (i.e. materials to be used with caution).**

**Do you agree to move Thiacloprid to the Orange List, group ‘b’ (restricted materials with specific conditions for use)?**

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

**Proposal 2.1.3. Acetamiprid is one of the neonicotinoids and currently it is not listed in any of Fairtrade hazardous materials lists. It is proposed that conditions of its use should include risk mitigation measures.**

**Do you agree to add Acetamiprid to the Orange List?**

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

**Clothianidin**

*(examples of trade names of pesticides containing this active ingredient:* ***Celero, Poncho, Dantotsu, Fullswing, Clutch, Dantop, Pancho, Apacz, Belay)***

**Question 2.1.-4** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Chlothianidin*?**

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 2.1-5** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.1-6** **Please indicate the scope and frequency of use of pesticides/products containing Chlothianidin**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Imidacloprid**

*(examples of trade names of pesticides containing this active ingredient:* ***Click, Confidor, Altakan, Atom, Tata Mida, Kohinor 30 SC, Imidacel)***

**Question 2.1-7** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Imidacloprid*?**

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 2.1-8 For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.1-9** **Please indicate the scope and frequency of use of pesticides/products containing Imidacloprid**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Thiamethoxam**

*(examples of trade names of pesticides containing this active ingredient:* ***Actara, Acti-for, Agricao, Angeo, Boradyne, Engeo, Tropidine, Voliam flexi, True)***

**Question 2.1-10** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Thiamethoxam?***

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 2.1-11 For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.1-12 Please indicate the scope and frequency of use of pesticides/products containing Thiamethoxam**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Thiacloprid**

*(example of trade name of pesticide containing this active ingredient:* ***Proteus )***

**Question 2.1-13** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Thiacloprid***?

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify:

Other (please specify)

**Question 2.1-14 For which reasons phasing out this material or restricting its use might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.1-15** **Please indicate the scope and frequency of use of pesticides/products containing Thiacloprid.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Acetamiprid**

*(examples of trade names of pesticides containing this active ingredient:* ***Assail, Chipco )***

**Question 2.1-16** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Acetamiprid***?

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 2.1-17** **For which reasons restricting use of this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.1-18** **Please indicate the scope and frequency of use of pesticides/products containing Acetamiprid.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

###### 2.2 Chlorpyrifos, Chlorpyrifos-methyl

There is evidence in the peer-reviewed literature that Chlorpyrifos has reprotoxic hazards, as well as many others problems, including serious neurological harm potential to the foetus and children. Regular use of Chlorpyrifos can maximize its persistent and bio-accumulative properties in soil, water, food and air. It can travel long distances and finds its way into the human body through environmental exposure or consumption of contaminated food ([source](https://www.env-health.org/IMG/pdf/-49.pdf)).

In addition to the immediate effects of exposure, chlorpyrifos is linked to a number of serious longer term health impacts. It is currently approved by European Commission until January 2020 and will be banned together with the related substance chlorpyrifos-methyl, which have been identified as a possible cause of neurological damage in children.

Fairtrade would like to move Chlorpyrifos and Chlorpyrifos-methyl from restricted list (Orange list) to prohibited list (Red List).

**Please provide your feeback on the proposal and answer the questions for each of the agrochemicals**

**Proposal 2.2.1** **Do you agree to move Chlorpyrifos and Chlorpyrifos-methyl from Orange list, group ‘b’ to Red list?**

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

**Chlorpyrifos, Chlorpyrifos-methyl**

(*examples of trade names of pesticides containing these active ingredients*: ***Dursban, Lorsban***)

**Question 2.2-2** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Chlorpyrifos***?

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 2.2-3** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.2-4** **Please indicate the scope and frequency of use of pesticides/products containing Chlorpyrifos.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Question 2.2-5** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Chlorpyrifos-methyl***?

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 2.2-6** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.2-7** **Please indicate the scope and frequency of use of pesticides/products containing Chlorpyrifos-methyl.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

###### 2.3 Sulfoxaflor

Sulfoxaflor is a fourth-generation neonicotinoid shares many hazard features of neonicotinoids and exhibits a high insecticidal activity against a broad range of sap-feeding insects[[9]](#footnote-9). It is relatively volatile, whilst potentially mobile in soils it has a low potential for leaching due to its rapid degradation rate. It has a high potential to bioaccumulate, generally moderately toxic to birds and mammals and has a low toxicity to most aquatic species. It is highly toxic to honeybees and earthworm[[10]](#footnote-10).

**Sulfoxaflor is currently listed in the Yellow list (i.e. materials to be used with caution) Fairtrade HML document. Fairtrade would like to respond to recent research and findings on agrochemicals that are highly toxic to bees and move Sulfoxaflor to restricted list (Orange list), group ‘B’ and allow its use only under specific conditions.**

**Please provide your feeback on the proposal and answer the questions for each of the agrochemicals**

**Proposal 2.3.1. Do you agree to move Sulfoxaflor from Yellow list to the Orange List (restricted materials with specific conditions for use)?**

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

**Sulfoxaflor**

(*examples of trade names of pesticides containing this active ingredient:* ***Transform, Closer***)

**Question 2.3-2** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Sulfoxaflor*?**

Yes

No

*If ‘yes’, please specify below all those available for your crop:*

Biopesticides

Using beneficial insects (natural enemies of pests)

Good field sanitation and post-harvest clean up

Crop varieties resistant or tolerant of the pest/disease

Sticky traps, pheromone or other traps or physical barriers

Enhanced crop rotation or intercropping

Other good cultural or agronomic practices, e.g. management to avoid lush, green crop foliage which attracts sucking pests

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify) *Click here to enter text*

**Question 2.3-3For which reasons phasing out this material or restricting its use might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 2.3-4 Please indicate the scope and frequency of use of pesticides/products containing Sulfoxaflor**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

###### 2.4 Other active ingredients listed in Orange List in group ‘b’

*Cypermethrin & its alpha and beta isomer, Deltamethrin, Fipronil*

**Question 2.4.1. Do you know of any phase out challenges with any other Orange List active ingredient in group ‘b’ *(to be used under specific conditions)* that needs to be addressed in this monitoring review?**

**If it is used by your members OR organization, please specify below for which pests/diseases and which crops and explain challenges.**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Nr.** | **Name of active ingredient of material**  *(from Orange List, group ‘b’)* | **Name of target organism**  *(pest/insect/plant (vegetation) OR disease);* | **Name of the crop on which it is applied** | **Scope and frequency of use** | **Alternatives available[[11]](#footnote-11)**  *(specify which alternatives are available)* | **Challenges for phase out11** |
| **1** |  |  |  |  |  |  |
| **2** |  |  |  |  |  |  |
| **3** |  |  |  |  |  |  |
| **4** |  |  |  |  |  |  |
| **5** |  |  |  |  |  |  |
| **6** |  |  |  |  |  |  |
| **7** |  |  |  |  |  |  |
| **8** |  |  |  |  |  |  |
| **9** |  |  |  |  |  |  |
| **10** |  |  |  |  |  |  |

## **Section 3. Other agrochemicals from restricted list**

###### 3.1 Glyphosate

Glyphosate is frequently in news due to concerns on health and the environment, in particular, biodiversity and nurturing resistance in so called “superweeds”[[12]](#footnote-12) . In 2015 the International Agency for Research on Cancer (IARC) of the World Health Organisation classified glyphosate its Group 2A “probably carcinogenic to humans”[[13]](#footnote-13),[[14]](#footnote-14). After the previous full HML review, glyphosate (acid) was listed in the Orange List without any further categorization on ‘specific conditions’ for use.

Later in 2017, the International Agency for Research on Cancer (IARC) scientists examined the scientific and regulatory literature on glyphosate impact on health and environment, and one of their conclusion was that there is a strong evidence on mechanism of its toxicity, such as cell and DNA damage (induction of oxidative stress and genotoxicity). PAN Europe further stated that based on increasing evidence on the toxicity of glyphosate and glyphosate-based products for humans and the environment, there is an urgent need to ensure that such chemicals are not used in agriculture or management of green/urban areas ([source](https://www.pan-europe.info/blog/new-developments-glyphosate)). In the meantime, the European Parliament has called for a full glyphosate ban within five years[[15]](#footnote-15), starting with immediate restrictions, including for non-professional uses and pre-harvest spraying.

Glyphosate acid is formulated as its isopropylamine, monoammonium, potassium, sodium or trimesium salts, to increase its solubility in water. The IARC in its Glyphosate-Monograph14 refers to the group ‘Glyphosate and its salts’, which consist of six active ingredients: glyphosate (acid), glyphosate-diammonium, glyphosate-isopropylamine, glyphosate-monoammonium, glyphosate-sodium, and glyphosate-trimesium. Also, since March 2018, PAN listed glyphosate in its Highly Hazardous Pesticides[[16]](#footnote-16) list referring to the group ‘Glyphosate and its salts’.

**To respond to recent changes in regulations and research on glyphosate impact, in this section we would like to consult on two proposals:**

* **To move Glyphosate to the prohibited list (Red List);**
* **In addition to glyphosate (acid), in the Red List, refer to the group ‘glyphosate and its salts’;**

**Please provide your feeback on the 2 proposals and answer the questions for each of the agrochemicals**

**Proposal 3.1.1**   **Do you agree to phase out the *Glyphosate* from the Orange List to the prohibited list (Red List)?**

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

**Proposal 3.1.2** **Do you agree that instead of referring to Glyphosate (acid), Fairtrade HML Red List refers to ‘*Glyphosate and its salts’* that includes the following materials:**

|  |  |
| --- | --- |
| *1.Glyphosate (acid)* | *CAS:1071-83-6* |
| *2. Glyphosate-diammonium* | *CAS:69254-40-6* |
| *3. Glyphosate-isopropylamine (isopropylammonium;-IPA)* | *CAS:38641-94-0* |
| *4. Glyphosate-monoammonium* | *CAS:40465-66-5* |
| *5. Glyphosate-sodium* | *CAS:34494-03-6* |
| *6. Glyphosate-trimesium* | *CAS:81591-81-3* |

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

**Glyphosate, CAS Nr:1071-83-6**

*(examples of trade names of pesticides containing this active ingredient.:* ***Adwuma Wura, Bibana, Coloso, Coopersate, Credit, Cuspide, Eraser, Estelar, Faena, Fagilia, Gatdow, Glifocafe, Glifocate, Glifolag, Glifolaq, Glifosato, Glifosol, Glycel, Glycot, Glyfos, Glyfost, Glyphader, Gly-phogan, Green fire, Kalach, Mamba, Pantek, Panzer, Rapidmax, Root out, RoundUp, Socar, Touchdown, Twigasate, Victorius, Weed All, Weed Round, Wipe-out and Woundout******)***

**Question 3.1-3 Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Glyphosate***?

Yes

No

***If ‘yes’,*** *please specify below all those available for your crop:*

Bioherbicides;

Mechanical weeding

Good field sanitation and post-harvest clean up;

Manual removal of weeds;

Weed removal by livestock grazing;

Enhanced crop rotation or intercropping;

Other good cultural or agronomic practices;

Using cover crops to help suppress problematic weeds;

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 3.1-4** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 3.1-5Please indicate the scope and frequency of use of pesticides/products containing Glyphosate.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

###### 3.2 Mancozeb, Carbendazim

There is a number of materials listed in the Orange List (Restricted) with the purpose to not only restrict the use of these materials but also to enable their gradual phase out from use on Fairtrade crops. Mancozeb, Carbendazim, were brought to our attention as materials to give additional focus during this monitoring review. These both agrochemicals are highly hazardous pesticides. In particular Carbendazim, which is mutagenic and reprotoxic, and causes big problems to fertility. Mancozeb is probably carcinogenic and endocrine disruptor and also can cause developmental and fertility problems.

**The aim of questions below is to explore better the challenges from producer/trader side to phase them out and also to better understand existing alternatives in regions or awareness among producers about these alternatives.**

**Mancozeb**

*(examples of trade names of pesticides containing this active ingredient:* ***Penncozeb, Trimanoc, Vondozeb, Dithane, Manzeb, Nemispot, Cobrethane, Derosal, Funglak, Impulse, Invezeb, Mupazeb – M – 45, Oshothane 80 wp, Ramazate, Ridodur, Ridomil, Stargem, Titan 80 wp, Unizeb, Victory and Manzane)***

**Question 3.2-1** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Mancozeb***?

Yes

No

***If ‘yes’,*** *please specify below all those available for your crop:*

Biofungicides;

Good field sanitation and post-harvest clean up;

Crop varieties resistant or tolerant of the pest/disease;

Enhanced crop rotation or intercropping;

Other good cultural or agronomic practices, e.g. management to avoid excess humidity in crop foliage which can encourage more disease problems;

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 3.2-2** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 3.2-3** **Please indicate the scope and frequency of use of pesticides/products containing Mancozeb.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

**Carbendazim**

*(examples of trade names of pesticides containing this active ingredient:* ***Arin, Bavistin, Carbencal, Colizim, Colizym, Cropzim, Derosal, Evosim, Goldazim, Kendazim, Kendazin)***

**Question 3.2-4** **Are you aware of any alternative products or practices (chemical or non-chemical) which could be used, instead of *Carbendazim***?

Yes

No

***If ‘yes’,*** *please specify below all those available for your crop:*

Biofungicides;

Good field sanitation and post-harvest clean up;

Crop varieties resistant or tolerant of the pest/disease;

Enhanced crop rotation or intercropping;

Other good cultural or agronomic practices, e.g. management to avoid excess humidity in crop foliage which can encourage more disease problems;

Alternative chemical products that are not on the Fairtrade HML Orange List, please specify: *Click here to enter text*;

Other (please specify)

**Question 3.2-5** **For which reasons phasing out this material might be challenging for you / your members?**

Alternative products are most costly than this material;

Alternative products exist but not easily available in our area;

Local agri-supply stores and dealers recommend/offer farmers pesticides as the first or often only option

Farmers need training first in how to use alternative products or practices effectively;

Field agents lack sufficient experience in training farmers to use IPM methods effectively and profitably’

Farmers’ mindset is to go for a chemical first, rather than other IPM methods;

Farmers fear risking yield loss or reduced crop quality if they use non-chemical methods;

Other (please specify) *Click here to ener text*

**Question 3.2-6** **Please indicate the scope and frequency of use of pesticides/products containing Carbendazim.**

**Name of the crop on which it is applied:** *Click here to enter*

**Name of the target organism:** *Click here to enter*

used only by a small number of members, not always every season;

*Please specify how many times per season: Click here to enter*

used by some members, sometimes

*Please specify how many times per season:* *Click here to enter*

used by most producers, in almost all seasons

*Please specify how many times per season:* *Click here to enter*

used by almost all producers in every season

*Please specify how many times per season:* *Click here to enter*

###### 3.4 Other active ingredients listed in Orange List

(2*,4-DB, Amisulbrom, Amitraz, Atrazine, Bifenthrin, Carbaryl, Chlorantraniliprole, Dimethoate, Epoxiconazole, Etofenprox, Fenitrothion, Flufenoxuron, Flusilazole, Glufosinate ammonium, Lufenuron, Phosphine, Pirimicarb, Procymidone, Propargite, Quinoxyfen)*

**Question 3.4-1. Do you know of any phase out challenges with any other Orange List active ingredient that needs to be addressed in this monitoring review?**

**If it is used by your members OR organization, please specify below for which pests/diseases and which crops and explain challenges.**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Nr.** | **Name of active ingredient of material** | **Name of target organism**  *(pest/insect/plant (vegetation) OR disease);* | **Name of the crop on which it is applied** | **Scope and frequency of use** | **Alternatives available[[17]](#footnote-17)** | **Challenges for phase out17** |
| **1** |  |  |  |  |  |  |
| **2** |  |  |  |  |  |  |
| **3** |  |  |  |  |  |  |
| **4** |  |  |  |  |  |  |
| **5** |  |  |  |  |  |  |
| **6** |  |  |  |  |  |  |
| **7** |  |  |  |  |  |  |
| **8** |  |  |  |  |  |  |
| **9** |  |  |  |  |  |  |
| **10** |  |  |  |  |  |  |
| **11** |  |  |  |  |  |  |
| **12** |  |  |  |  |  |  |

**Question 3.4-2 If you know about challenges with another active ingredient listed in Orange OR Yellow list that needs to be addressed in this monitoring review, please specify here and provide the rationale and as many details as possible**:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Nr.** | **Name of active ingredient of material** | **Name of target organism**  *(pest/insect/plant (vegetation) OR disease);* | **Name of the crop on which it is applied** | **Scope and frequency of use** | **Alternatives available[[18]](#footnote-18)**  (specify which alternatives are available) | **Any existing challenges** |
| **1** |  |  |  |  |  |  |
| **2** |  |  |  |  |  |  |
| **3** |  |  |  |  |  |  |
| **4** |  |  |  |  |  |  |
| **5** |  |  |  |  |  |  |
| **6** |  |  |  |  |  |  |
| **7** |  |  |  |  |  |  |

## **Section 4. Transition period**

The transition period indicates the time that as of the publication of the changes, producers and traders would have to implement them.

**Question 4.1-1 Do you agree with a transition period of 6 months for the implementation of the changes suggested in this document?**

Yes.

No.

I have another proposal. Please specify here:

Not relevant to me / I don’t know.

**Please explain your rationale below:**

## **Section 5. General comments/feedback**

**If you have any comments about the HML monitoring review that we need to consider, please provide in boxes below**:

|  |  |
| --- | --- |
| ***subject*** | ***comment*** |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

1. ‘a’ – To be used only for Apiculture;

   ‘b’ – Not to be used on young plant materials; to be used only in greenhouse production; OR in open field conditions, it is not used on gregariously flowering melliferous crops, starting one month prior to peak flowering and during flowering period. (e.g. coffee, fruit trees, cashew, almond etc. The certification body will determine the crops which fall under this type);

   ‘c’ – to be used only by professionally trained warehouse staff using proper personal protective equipment and specially designed equipment to ensure hermetic sealing and minimize gas leakages

   ‘d’ - to be phased out by 30st June 2020. [↑](#footnote-ref-1)
2. It’s important for us to understand the existing alternatives and challenges. Please provide us as much detailed information as possible.

   For example:

   on alternatives: *“there are very few alternatives to keep weeds at bay, other than manual weeding. This is not practical”*

   on challenges: *“high costs” / “no other options that would not be listed in the orange list”* [↑](#footnote-ref-2)
3. Natural enemies: lady bugs, spiders, mantids, snails and other. [↑](#footnote-ref-3)
4. Greenpeace bee toxic 7, namely: Clothianidin, Imidacloprid, Thiametoxam, Chlorpyriphos, Cypermethrin, Deltamethrin, and Fipronil [↑](#footnote-ref-4)
5. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6221087/> [↑](#footnote-ref-5)
6. <http://www.europarl.europa.eu/doceo/document/TA-8-2019-0199_EN.html> [↑](#footnote-ref-6)
7. crops with flowers that contain nectar [↑](#footnote-ref-7)
8. <https://ec.europa.eu/food/plant/pesticides/approval_active_substances/approval_renewal/neonicotinoids_en> [↑](#footnote-ref-8)
9. <http://www.tfsp.info/assets/WIA_2015.pdf> [↑](#footnote-ref-9)
10. <https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1669.htm> [↑](#footnote-ref-10)
11. *It’s important for us to understand the existing alternatives and challenges. Please provide us as much detailed information as possible.*

    ***For example:*** *on alternatives: “there are very few alternatives to keep weeds at bay, other than manual weeding. This is not practical”*

    *on challenges: “high costs” / “no other options that would not be listed in the orange list”* [↑](#footnote-ref-11)
12. Herbicide-resistant weeds (<https://www.sourcewatch.org/index.php?title=Glyphosate_Resistant_Weeds>) [↑](#footnote-ref-12)
13. <https://www.iarc.fr/wp-content/uploads/2018/07/MonographVolume112-1.pdf> [↑](#footnote-ref-13)
14. <https://monographs.iarc.fr/wp-content/uploads/2018/06/mono112-10.pdf> [↑](#footnote-ref-14)
15. <http://www.europarl.europa.eu/RegData/etudes/BRIE/2018/614691/EPRS_BRI(2018)614691_EN.pdf> [↑](#footnote-ref-15)
16. <http://pan-international.org/wp-content/uploads/PAN_HHP_List.pdf> [↑](#footnote-ref-16)
17. *It’s important for us to understand the existing alternatives and challenges. Please provide us as much detailed information as possible.*

    ***For example:*** *on alternatives: “there are very few alternatives to keep weeds at bay, other than manual weeding. This is not practical”*

    *on challenges: “high costs” / “no other options that would not be listed in the orange list”* [↑](#footnote-ref-17)
18. *It’s important for us to understand the existing alternatives and challenges. Please provide us as much detailed information as possible.*

    ***For example:*** *on alternatives: “there are very few alternatives to keep weeds at bay, other than manual weeding. This is not practical”*

    *on challenges: “high costs” / “no other options that would not be listed in the orange list”* [↑](#footnote-ref-18)