Consultation Results Synopsis Information to stakeholders on the outcome of the Revision of the Prohibited Materials List (PML)	
To	Fairtrade Producers, Traders, Producer Networks, NFOs, Fairtrade International Staff, FLOCERT
Consultation Period	15.12.2015 – 15.03.2016
Standards Committee Meeting for Decision	June
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PART 1 Introduction

1.1. General Introduction

Fairtrade International Standards & Pricing (S&P) would like to thank all stakeholders for the time and effort they have put into participating in the consultation on the Review of the Prohibited Materials List (PML). The consultation which, was initially intended to conclude on the 15 February 2016, was extended for a month following a stakeholders' request to widen participation. In total over 340 responses were received formally through the online Survey Monkey web tool and submissions via E-mails. The responses were received from a wide range of stakeholders including producers of a wide range of products, traders including processors, exporters and importers, PNs, NFOs etc. Thanks to these contributions, S&P has gained a thorough understanding on the perception of the stakeholders on pesticides regarding their usefulness and hazards to health and environment. The learnings from this consultation will be used to propose a different approach in the PML and the new proposal will be consulted in a second round. Together with the results of the research carried out by S&P, the information from the consultations provides the basis for our recommendation to the Standards Committee. The Standards Committee's decision regarding proposed revisions and changes to the standard will take stakeholders' input strongly into consideration.

This document aims to present the outcome of the consultation and the subsequent recommendations from S&P on the future steps. The results of the consultation are discussed herewith without disclosing confidential stakeholder information.

Should you have any queries or remarks concerning this report, please contact the Project Manager Arayath Kooteri Sajindranath at: s.arayath-kooteri@fairtrade.net

1.2. Executive Summary

After 4 years of implementation, Fairtrade International is reviewing its List of Prohibited Materials (PML). This list encompasses materials that are forbidden by Fairtrade (red list materials) and materials that are monitored in view of phase out (amber list materials). In the interim, various International conventions and bodies have periodically revised and added new pesticides to lists of highly hazardous pesticides based on accumulated knowledge over toxicity and safety of these chemicals.

Background

- Last review of the Prohibited Materials List as a part of the Generic Environmental Standards (GES) review was undertaken in 2011.
- It was periodically amended mainly with regards to possibility of derogations for some pesticides.
- Review PML commenced in January 2015 and is intended for a decision in June 2016

Project objectives

The main objective is to revise the PML
While the specific objectives are to:
- Update the red and amber lists of prohibited materials
- Incorporate new materials that should be monitored and progressively phased out
- Review the process of request for permission for derogation through audit reports
- Update the standard requirements related to monitoring and use of pesticides

Project phases and timelines

	Timeline	Activity
2015	Q3	Research
	September 29	Standards Committee meeting – information and guidance:
	October	Finalize research and drafting standard and consultation documents
	December 15	Consultation (60 days, all operators, stakeholders and open to public participation)
2016	Feb 15	Extension of consultation period for a month
	Feb 24	Presentation of preliminary results to SC
	March 15	Closure of consultation period
	March	Analysis of consultation results
	April	Synopsis of consultation published
	March - April	Development final proposal PML
	April - May	Second round of consultation
	June	SC Decision

Participants

Efforts were taken to ensure participation of the widest possible numbers stakeholders, More than 3,500 individual email invitations were sent with the consultation document. The PNs, NFOs and FLOCERT were requested to extend the circulation of the invitation and help in the widest possible participation in the consultation process. A prominent NGO working in this filed, who were consulted in the research phase were also requested to participate in the consultation process and give their valuable inputs. Care was taken that all kinds of stakeholders, including producers under different setups, producing the widest range of products covering all possible geographical regions under the Fairtrade Standards, were able to participate. The consultation documents were translated to all four languages used by Fairtrade. The consultation was extended on request and in total 90 days was allotted to maximize response from stakeholders

Findings

A set of 11 questions regarding changes to the PML were asked in the public consultation. The questions can be broadly classified into **a)** overall criteria for classification of pesticides to the Red and Amber list and **b)** those regarding specific pesticides. There was an overall acceptance on the criteria proposed for the classification of the materials to the Red and Amber List. However, some producers were concerned with specific chemicals proposed to the Red List and were concerned with the effect of unavailability of these pesticides to their business.

1.3. Next steps

The results of the consultation indicate that there is a desire among some producers to not prohibit all pesticides classified in the Red List immediately. It would thus be good to propose some ways to deal with some of these pesticides by allowing conditional use with an aim to phase them out. Therefore, a second proposal including a list of these identified pesticides resulting from the consultation will be put forward in a second round of consultation. S&P will present the results of this consultation and the results of the second round of consultation along with S&P recommendations to the Standard Committee at the meeting in June 2016. The final PML: will be published succeeding its approval by the SC

The final decision of the SC will be published in the minutes following the meeting and will be available on the Fairtrade website.

1.4. Abbreviations

COSP	Cost of Sustainable Production
EU	European Union
Eurosanco	European Commission's Directorate General for Health and Consumer Protection (DG SANCO)
LD 50	Lethal Dose for killing half (50%) of the animals tested
LEAF	Linking Environment And Farming(is an environmental assurance system recognising sustainably farmed products - www.leafuk.org
MRL	Maximum Residue Limit
NFO	National Fairtrade Organization
PHI	Post-Harvest Interval
PML	Prohibited Materials List
PNs	Producer Networks
PPPL's	Proposed pesticide product list
RET	Re Entry Time
S&P	Standards & Pricing
SC	Standards Committee
SE Asia	South East Asia
SPO	Small Producer Organization
US EPA	United States, Environmental Protection Agency
USDA	United States Department of Agriculture

1.5. Annexes

Annex 1 Consultation document for Fairtrade Stakeholders

PART 2 Consultation outcomes

2.1. Consultation process

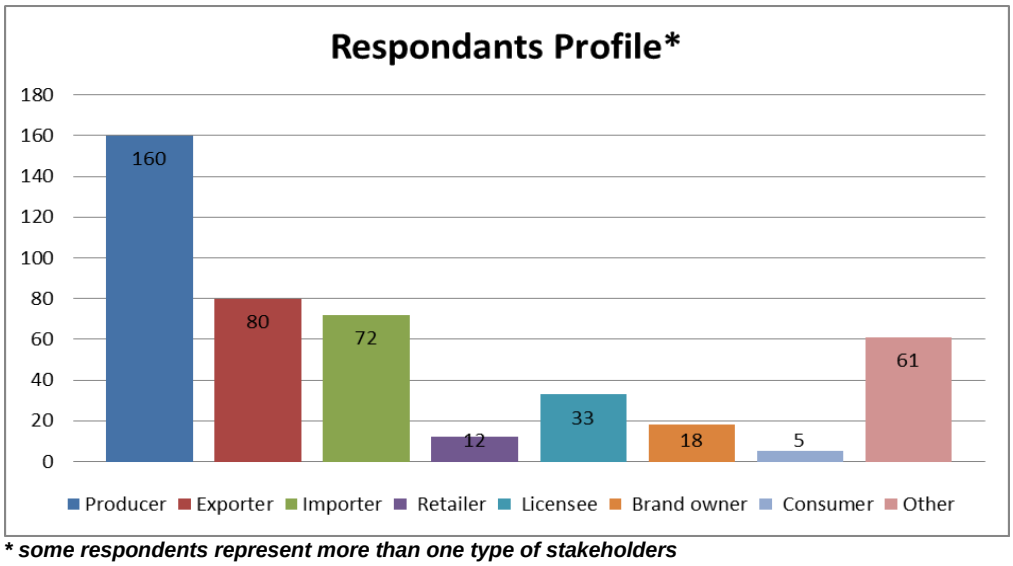
The public consultation on the PML began on 15 December 2015 and was planned to end on the 15 February, 2016. A web based survey tool (Survey Monkey) was used to collect the feedback from the consultation. The consultation was further extended for a month to the 15th of March following a stakeholder request and to enable broader participation, in particular from producer regions.

Efforts were taken to widen the base for consultation as the revised Trader Standard had included the PML into its scope and made it applicable to all traders. Since the issue of pesticides are also very much in concern with the consumers, efforts were taken to include the NFOs also, who represent the consumer facing part of Fairtrade. Along with the Survey Monkey tool, the consultation questions were also available in its MS Word format and respondents could send their feedback to the project manager directly. The consultation questions were made available in four languages (English, Spanish, French and Portuguese) for the ease of producers in various regions to respond. More than 3,500 individual emails were sent with the details of the consultation and three remainders were sent to each of them for response.

All answers were collated and detailed responses were categorized according to questions

2.2. Overview of stakeholder participants

In total 342 individual responses were received from various stakeholders, this would form nearly 10% of the respondents who were sent the request for participation. This number looks adequate, if we take into consideration that many of the producers are organic certified and a vast number of the certified stakeholders are traders, together they constitute a section that do not use the materials in the PML, which would have contributed to limited interest in their participation. The responses received show a very strong participation of producers, who form the majority of the respondents and represented those who were affected or potentially affected by the PML. The graph shows the extent of participation from different stakeholders.



**** some respondents represent more than one type of stakeholders***

The responses showed a wide geographical participation in the consultation process and all continents are represented. The Table gives the number of responses received from different countries,

Table. Geographical distribution of respondents

Country	No of Respondents	Country	No of Respondents	Country	No of Respondents
Germany	20	Chile	4	DR Congo	1
Republica Dominicana	20	Ethiopia	4	Egypt	1
Colombia	18	Ghana	4	El Salvador	1
Brazil	17	Sri Lanka	4	England	1
Switzerland	16	Thailand	4	Guatemala	1
Kenya	15	Austria	3	Haiti	1
South Africa	15	Denmark	3	Lebanon	1
India	12	Japan	3	Morocco	1
Netherlands	12	Madagascar	3	New Zealand	1
France	11	Tunisia	3	Norway	1
Italy	11	Vietnam	3	Papua New Guinea	1
Peru	11	Argentina	3	Philippines	1

Country	No of Respondents	Country	No of Respondents	Country	No of Respondents
Nicaragua	10	Bolivia	2	Rwanda	1
Côte d'ivoire	9	Cameroon	2	São Tomé e Príncipe	1
United States	9	China	2	Singapore	1
Mexico	8	Finland	2	St. Lucia	1
Costa Rica	7	Indonesia	2	Sweden	1
Mauritius	7	Jamaica	2	Taiwan	1
Uganda	6	Malawi	2	Togo	1
United Kingdom	6	Tanzania	2	Turkey	1
Ecuador	5	Australia	1	Uruguay	1
Spain	5	Belgium	1	Zimbabwe	1
Hondurus	5	Burkina Faso	1		
Belize	4	Canada	1	Grand Total	342

2.3 Consultation outcome and stakeholder feedback

This section provides a summary of all responses received for each survey question. The questions were categorized into 5 parts, and each had sub-questions. The first question was on the personal details of the respondents. The parts 2-4 dealt with specific questions on pesticides and had 10 questions in this section. The part 5 was for additional comments.

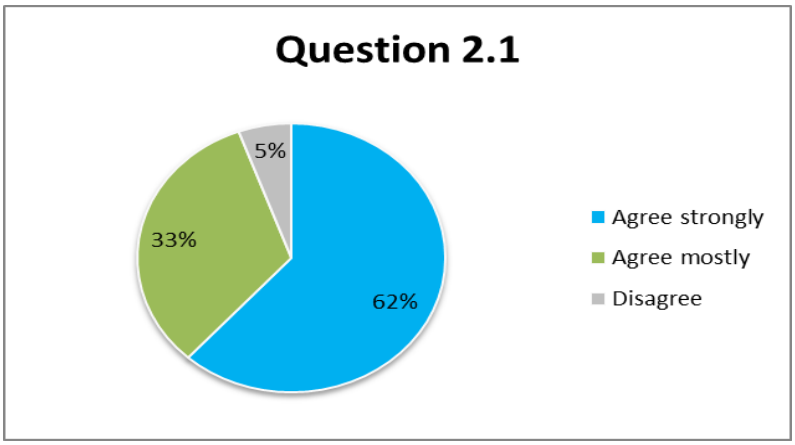
The section summarises the responses received against each question and are given under each question.

2.3.1 Criteria used for classification of Red List

(Question -**2.1 Do you agree with the criteria of Red List)**

A total of 342 responses were received on this question by the end of the consultation period. The table gives the distribution of responses. Most of the respondents favoured the criteria proposed for classification on the pesticides in the PML. Among them most favoured the criteria strongly (62%), while (33%) agreed to most part of it. Many of them were of the opinion that all chemicals that harmed human health and the environment should be removed from use and criteria like probably carcinogenic should be definitely included in the Red List.

2.1Response	Total
Agree strongly	211
Agree mostly	112
Disagree	19
Grand Total	342



While most of the respondents agree, there were some opinions against the longer Red List. Producers were concerned that some of the pesticides, especially the neo-nicotinoides were commonly used and were very effective in pest control and they don't see a viable alternative to these pesticides. There were also comments that, Fairtrade should not go beyond legally

allowed pesticides, while there was a suggestion that only human health should be a criteria for the Red List pesticides. There was an opinion that only those materials listed in various conventions and are classified as highly toxic (WHO classification) should be the only criteria used to classify the Red List. There were questions raised on the issue of endocrine disturbers, since they have not been globally agreed. Some were concerned that though the bees are important, the farmers should not lose out in the bargain, where they are robbed of the only protection against destructive pests. There was an opinion that bee mortality can have other climatic reasons and cannot be blamed only on certain pesticides and pesticides if properly used will not cause problems to health and environment.

One concern raised was that the proposed list is based on hazard and not on needs and necessity of using specific pesticides, e.g targeted pests, allowed and alternative pesticides in the country, alternative controls, the re-entry time (RET) & Minimum Residue Level (MRL) etc. This would cause challenges to the producers to have alternative options. Also concerns were raised that, some of the pesticides that were proposed in the Red List were allowed by other retail chains. One respondent suggested that it would be practical, to not add the new materials in the Red List now, but to add them in the Amber List and allow a transition period of 3-5 years for their phase out.

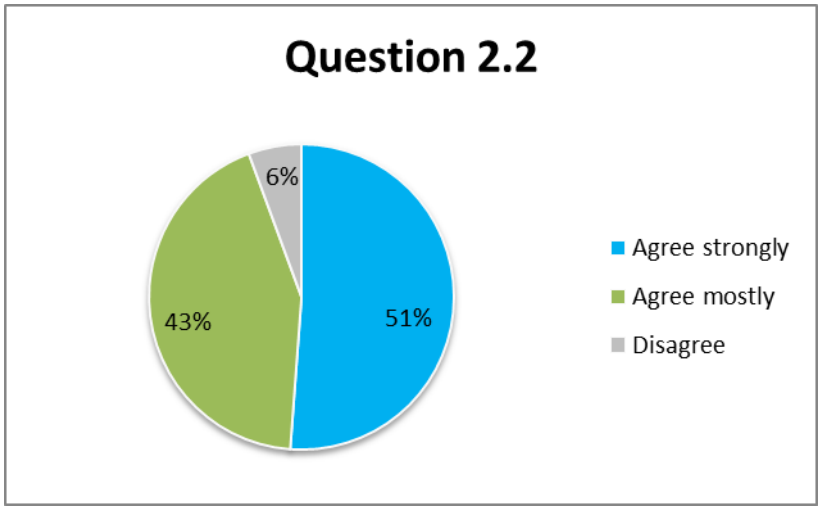
A concern was raised that the liability and credibility of Fairtrade would be at stake if a lot of non-conformities rise due to a longer and stricter Red List and the best approach would be to have a shorter Red List with the worst pesticides listed on it and a heavy sanction for using them. The NGO working in this field was concerned that the longer Red List will be difficult for implementation and felt it as a challenge. However, they felt that the list was ambitious and these proposed criteria will put Fairtrade ahead of the other standards in many aspects.

The concept of "extremely bee toxic" and the source used as reference was questioned. The respondent could not find a list or clear guidance of substances which are very bee toxic in the US EPA site and was concerned that the logic for classifying different pesticides may not be consistent. Another respondent was not clear on the criteria for classification of environmental concerns and not sure on the probability/rating being considered – 'suspected, likely, probable, moderate' to classify a product as risk to environment.

2.3.2 Criteria used for classification of Amber List

(Question 2.2 Do you agree with the criteria of Amber List)

A total of 338 responses were received for this question, of which the majority were in agreement with the criteria used for the Amber List i.e 173 strongly agreed and 146 agreed to most part of the proposal. This together represents 94% of the respondents



There was a comment which favoured all chemicals harmful to environment to be included in the Red List, while on the other extreme, there was a suggestion that only the Amber List should exist and the regional laws should determine which chemical should be prohibited and all chemicals should be used with caution.

One respondent reflected that many small and medium producers in Central America are using diverse materials

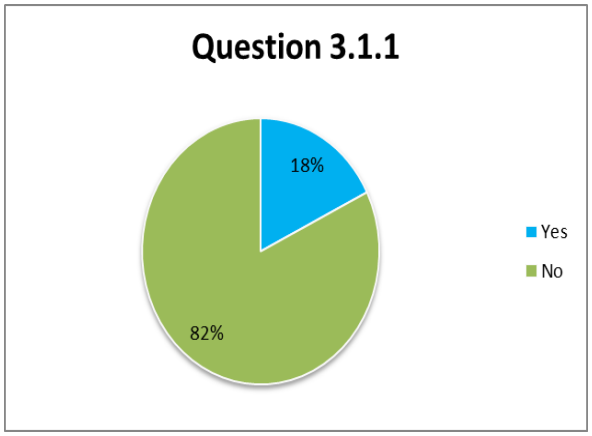
from Amber List which are persistent in soil and water and has affected health and people are dying of kidney failure and other diseases because of poor management of pesticide application.
A question was raised on the inclusion of Spinosad in the Amber List as it was allowed in organic farming and suggested not to prohibit pesticides that are allowed in organic farming. It was highlighted that Amoxicillin which was on the Red List for bananas has now been placed in the Amber List, while there are many other antibiotics that are used in agriculture.

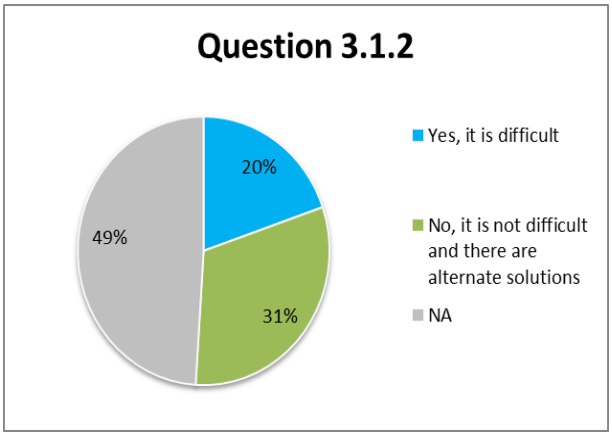
The NGO working in the field of pesticides was curious on the need for Amber List, since there are no ambitions, no stipulated objectives and no practical activities stated or requirements related to this list. They were of the opinion that the Amber List is less precautionary for protecting human and environmental health, but having classified the priority bee-toxic 'Greenpeace 7' to Red List, has made some balance. They were interested to know what Fairtrade proposes for compliance and phase out of Amber List pesticides

2.3.3 Classification of materials in the Red List

(Question 3.1.1: Do you see any material in the Red List, that you feel should be placed in the Amber List)
Question 3.1.2: Do you see any material in the Red List that would be extremely difficult for you (or your organization) to stop using?)

The above two questions were related to possible difficulties of producers in doing away with certain pesticides that are proposed to be placed in the Red List. It was observed that 82% of the 288 responses did not find any need to change the proposed Red List. However, since as stated before, not all of the certified operators use pesticides (as many are organic certified, or use low input agriculture or are involved in trade or involved in business not using pesticides), those responses requesting placement of certain pesticides allocated to the Red/Amber List is of significance.





Around twenty percent of the respondents felt that it may be extremely difficult to stop using these pesticides and listed various reasons for this view (Q 3.1.2). While 31% of the 294 responses on this question were of the view that alternatives are available. 49% had no opinion on this question.

The following table gives the list of pesticides that were cited as extremely difficult to be excluded from use and requested a re-classification into the Amber List, including the rationale

Material	Crops and Pests	Quoted reasons
Chlorpyrifos	Banana - Colaspis beetle Pineapple – Mealybug & others	• Though are highly bee-toxic, there are others which are more bee-toxic considering the specific LD 50 • would make production of many tropical crops

Material	Crops and Pests	Quoted reasons
	Rice – various pests Passion fruit - thrips Citrus – various pests Coffee – coffee berry borer and others Tropical fruits – various pests other unspecified crops and pests	very difficult • Very challenging because suitable cost-effective alternative is not available • Used instead of Endosulfan and is very effective. • Other alternatives present in the current coffee production, are not equally effective and have high costs • The application time does not coincide with the time of presence of bees in coffee • Is included in the allowed list of products for the citrus industry in Brazil • It is a chemical that is most effective and with the shortest Post Harvest Interval (PHI). Chemicals that are left for the farmers to use to combat thrips, worms and fungi have a PHI of 14-21 days. This presents a great problem to their harvest schedule. • Farmers also need to consider the MRL value as set by the EU. This has a higher limit and is thus manageable for exports. • SE Asia climate will always attract insects. Farmers need to have 3-4 options available for rotation. • Most commonly used in Rice & only other alternative is organic rice • The proposed Red List is covering all the insecticides available on the Ghanaian market and thus allows limited alternatives. • It is the active ingredient added to the bags field for controlling Colaspis beetle in banana
Cypermethrin	Tropical fruits – unspecified pests Rice - unspecified pests Flower - unspecified pests Citrus - greening	• Though are highly bee-toxic, there are others which are more bee-toxic considering the specific LD 50 • would make production of many tropical crops very difficult • Very challenging because suitable cost-effective alternative is not available • It enables rotation of pesticides • In greenhouses where bees cannot enter and therefore these should be allowed • This is allowed in list of products for the citrus industry in Brazil
Imidacloprid	Sugar cane - Aneolamia spp Roses – various sucking pests Citrus – greening Passion fruit – thrips Rice – various pests Unspecified crop – red scale insects Various unspecified crops and pests	• It is a chemical used as alternatives to phase out and replace toxic chemicals banned by the conventions, such as monocrotophos • Monitoring on these substances could yield 'false positives' through activities from neighbouring fields. • Application done in indoor crop, so no environmental affect. • It is included in the allowed list of products for the citrus industry in Brazil • Has short post-harvest interval. Other chemicals have a PHI of 14-21 days, which presents a

Material	Crops and Pests	Quoted reasons
		great problem to their harvest schedule. • Farmers also need to consider the MRL value as set by the EU. • SE Asia climate will always attract insects. Farmers need to have 3-4 options available for rotation. • Very challenging because suitable cost-effective alternative is not available • Most commonly used in rice and the only other alternative is organic rice • The absence, will lead to use many different chemicals for the same control, which will make the chemical footprint higher.
Thiamethoxam	Sugar cane - Aneolamia spp Rice - unspecified pests Roses – unspecified pests Unspecified crop -leaf miner Pineapple - Mealybug among others Citrus - greening	• Chemicals used as alternatives to phase out and replace toxic chemicals banded by the convention such as monocrotophos • Very challenging because suitable cost-effective alternative is not available • Used on roses indoors and no risk to bees • It is included in the allowed list of products for the citrus industry in Brazil • The proposed Red List is covering all the insecticides available on the Ghanaian market and thus allows limited alternatives
Abamectin	Papaya – unspecified pest Citrus- greening Passion fruit - thrips, worms	• One of the chemical considered by Eurosanco and by USDA with low risk to the health with high MRL to the destinations. • It is included in the allowed list of products for the citrus industry in Brazil • Has short post-harvest interval. Other chemicals have a PHI of 14-21 days, which presents a great problem to their harvest schedule. • SE Asia climate will always attract insects. Farmers need to have 3-4 options available for rotation • Closest alternative 'Delegate' (spinetoram (in amber list)) is more harmful to beneficial insects. • Absence will lead to use of many different chemicals for the same control, which will make the chemical footprint much higher.
Bifenthrin	Papaya, Citrus unspecifed pests	• One of the chemical considered by Eurosanco and by USDA with low risk to the health with high MRL to the destinations. • Is included in the allowed list of products for the citrus industry in Brazil
Chlorothalonil	Papaya, banana - black sigatoka	• One of the chemicals considered by Eurosanco and by USDA with low risk to the health with high MRL to the destinations. • It is the first choice for control of black sigatoka (main endemic disease of banana)
Copper Hydroxide,	Papaya Tropical fruits	• One of the chemicals considered by Eurosanco and by USDA with low risk to the health with high MRL to the destinations. • Exclusion will make production of many tropical

Material	Crops and Pests	Quoted reasons
		crops very difficult • Copper Hydroxide is allowed for organic agriculture
Mancozeb	Papaya - unspecified Tropical fruits - unspecified Rice – unspecified Roses – downy mildew Passion fruit - unspecified Pineapple and mango - unspecified	• One of the chemicals considered by Eurosanco and by USDA with low risk to the health with high MRL to the destinations. • Exclusion would make production of many tropical crops very difficult • Very challenging because suitable cost-effective alternative is not available • No contact with natural environment in case of use in protected glass house • Widely used for disease control for its low price and low toxicity and is easily accessible for producers. • One of chemicals that is most effective and with the shortest PHI. • Farmers also need to consider the MRL value as set by the EU. • SE Asia climate will always attract insects and farmers need to have 3-4 options available for rotation. • The proposed Red List is covering all the insecticides available on the Ghanaian market and thus allows limited alternatives
Carbendazim	Tropical fruits – unspecified pests Rice – unspecified pests	• Exclusion will make production of many tropical crops very difficult • Very challenging because suitable cost-effective alternative is not available • Most commonly used in rice and the only other alternative is organic rice
Deltamethrin	Tropical fruits – unspecified pests Rice - unspecified pests Flowers - unspecified pests Pineapple - mealybugs	• Exclusion would make production of many tropical crops very difficult • Suitable cost-effective alternative is not available • It enables rotation of pesticides • In greenhouses where bees cannot enter these should be allowed • The proposed Red List is covering all the insecticides available on the Ghanaian market and thus allows limited alternatives
Dimethoate	Tropical fruits – unspecified pests Citrus - unspecified pests Pineapple - unspecified pests	• Exclusion would make production of many tropical crops very difficult • Included in the allowed list of products for the citrus industry in Brazil • The proposed Red List is covering all the insecticides available on the Ghanaian market and thus allows limited alternatives
Paraffin oils, mineral oil	Tropical fruits – unspecified pests	• Exclusion would make production of many tropical crops very difficult • Not a problem if used properly
Quinoxyfen	Unspecified crop and pest	• Monitoring on these substances could yield 'false positives' through activities from neighbouring fields.

Material	Crops and Pests	Quoted reasons
Cadmium Compounds	Cocoa – unspecified pests/diseases	• Moving these to the Red listing will negatively affect cocoa industry since there is already high scrutiny of cadmium in the chocolates in the market.
Aluminium Phosphide	Rice – fumigant – unspecified pests	• Suitable cost-effective alternative is not available
Fipronil	Rice - unspecified pests	• Suitable cost-effective alternative is not available • Most commonly used in Rice & only other alternative is organic rice
Flusilazole	Rice - unspecified pests	• Suitable cost-effective alternative is not available
Lambda Cyhalothrin	Rice - unspecified pests	• Suitable cost-effective alternative is not available
Triazophos	Rice - unspecified pests	• Suitable cost-effective alternative is not available • Most commonly used in Rice & only other alternative is organic rice
Methyl Bromide	Rice and other crops-fumigant	• Mandated by law in many countries
alpha-BHC;alpha-HCH	Unspecified crop and pests	• Has not been phased out in all countries
Beta-Cyfluthrin	Avacado – Sucking pests	• No alternatives are effective and loss up to 70% of crop expected, • This chemical is on the PPPL's of various large retailers such as Waitrose, Tescos and Albert Heijn etc. and even LEAF Marque. • Has been used instead of Acephate (in the Amber List) which was phased out
Lufenuron	Roses – unspecified pests	• Application done in indoor crop, so no environmental affect foreseen
Chlorantraniliprole,	Citrus – unspecified pests Coffee - Hypothenemus hampei (Coffee berry borer)	• Included in the allowed list of products for the citrus industry in Brazil • Very effective against Hypothenemus hampei (coffee drill) and other effective pesticides have already been classified in the Red List.
Dichlorvos	Unspecified crop – fruit flys	• Wide spectrum product. Prevents the use of multiple sprays of alternatives
Paraquat	Citrus - weeds	• As resistance for systemic weed killer is creating situation where systemic products are being sprayed at higher concentrations which will end up being more harmful for environment
Fenpropathrin	Roses- thrips	• Used only on extreme cases of thrips infestation • The alternative is to use many different chemicals for the same control, which will make the chemical footprint much higher.
Etofenprox	Citrus – unspecified pests	• Included in the allowed list of products for the citrus industry in Brazil
Glufosinate ammonium	Citrus - weed	• Included in the allowed list of products for the citrus industry in Brazil • Used instead of Paraquat
Propargite	Citrus - unspecified pests	• Included in the allowed list of products for the citrus industry in Brazil
Oxamyl	Banana- nematodes	• No viable alternatives have been identified in Windward Islands for control of nematodes
Procymidone	Unspecified	• Unspecified

Material	Crops and Pests	Quoted reasons
Ethylene oxide	Fumigant	• Unspecified
Atrazine	Sugar Cane- weeds	• One variety of cane which widely grown by planters in Mauritius is sensitive to Diuron.
Carbosulfan	Pineapple – mealy bugs	• The proposed Red List is covering all the insecticides available on the Ghanaian market and thus allows limited alternatives
Epoxiconazole	Coffee - Hemileia vastatrix and Cercospora Cercospora coffeicola	• has a lot of agronomic efficiency in these two diseases plaguing the coffee in Brazil
Coumaphos	Honey – Varroa (mites)	• No alternatives have been identified and this pest is highly destructive in bee keeping
Amitraz	Honey – Varroa (mites)	• No alternatives have been identified and this pest is highly destructive in bee keeping and limits availability of pesticides for rotation • Amitraz is approved by local health agencies such as Agriculture and Livestock Service of Chile, the Argentine National Animal Health Service (SENASA) of Argentina, etc.
2,4-DB	Sugarcane – broadleaved weeds	• Move to Red List could cause some difficulties for producers using it as it is newly classified and effective alternatives are not identified.
Thiram	Poinsettia – Bacterial leaf spot	• Needed to fight bacterial leaf spot diseases
Simazine	Unspecified crops - weeds	• Used instead of Paraquat
Rodenticides	Sugarcane - rats	• Should be removed from Red List as other methods used to control rats do not work

The frequency of request for each pesticide in the Red List to be moved to the Amber List is given below.

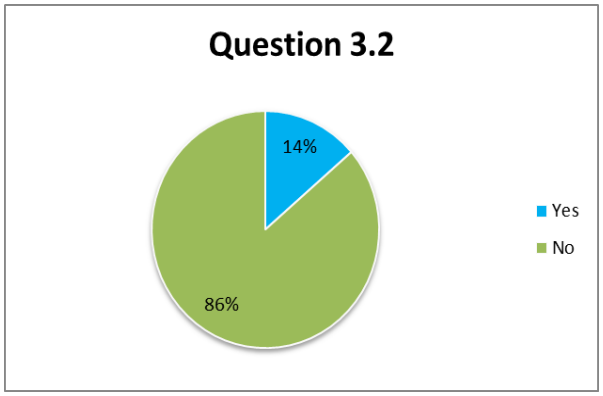
Pesticide	Freq	Pesticide	Freq	Pesticide	Freq	Pesticide	Freq
Chlorpyrifos	8	Chlorantraniliprole	3	Cadmium Compounds	1	Oxamyl	1
Imidachloprid	7	copper hydroxide	3	Carbosulfan	1	Paraquat	1
Thiamethoxam	7	Aluminium phosphide	2	Coumaphos	1	Procymidone	1
Cypermethrin	6	Chlorothalonil	2	Dichlorvos	1	propargite	1
Mancozeb	6	Dimethoate	2	2,4-DB	1	Quinoxyfen	1
Carbendazim	5	Expoxiconazol	2	etofenprox	1	Rodenticides	1
abamectin	4	Fenpropathrin	2	Fipronil	1	Simazine	1
Deltamethrin	4	Lambda Cyhalothrin	2	Flusilazole	1	Thiram	1
Lufenuron	4	mineral oil/Paraffin Oil	2	Glufosinate ammonium	1	Triazophos	1

Pesticide	Freq	Pesticide	Freq	Pesticide	Freq	Pesticide	Freq
Beta-Cyfluthrin	3	Amitraz	1	Ethylene oxide	1	alpha-BHC;alpha-HCH	1
Bifenthrin	3	Atrazine	1	Methyl Bromide	1		

2.3.4 Classification of materials in the Amber List

(Q 3.2: Do you see any material in the Amber List that would qualify to be placed in the Red List?)

Out of the 293 responses for this question 86% (253) found no need for any changes to the proposed Amber List. While 14% (40) indicated some changes to the Amber List.



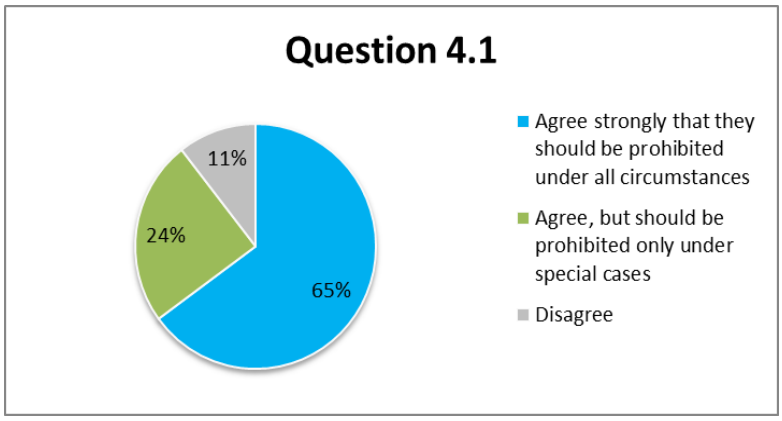
Views ranged from "all pesticides should be in the Red List" to "Except those allowed under organic standards" to "All pesticides should be in the Amber List". There was one request to include all bee toxic pesticides to the Red List. The following chemicals were pointed out as fit to be in the Red List: Acephate (as it breaks down to a Red List product Methamidophos), Glyphosate, Malathion, Butocarboxim, Polychlorinated terphenyls (PCT) and Methyl thiophanate. It is worth noting that out of these pesticides Butocarboxim is listed in the current Red List. Question was raised on why all forms of paraquat have not been included in the Red List.

2.3.5 Bee toxic materials

(Question 4.1 Do you agree that these highly toxic material to bees should be added to the Red List)

The following table represents the distribution of responses on the question stated above

4.1 Response	Total
Agree strongly that they should be prohibited under all circumstances	178
Agree, but should be prohibited only under special cases	67
Disagree	29
Grand Total	274



It is clear from the table that most of the opinions were strongly favouring inclusion of the pesticides that are classified as highly bee toxic into the Red List. However, there was some significant opposition to the inclusion of these commonly used pesticides into the Red List. Many suggestions were indicating that these should allowed to be used under special circumstances, such as allowed for glass house production, prohibit it for open field, allowing its use according to location, allowing for crops not attractive for bees or that do not need cross pollination, prohibition only in the flowering period, not used for aerial spraying. It was felt by the respondent that emphasis on responsible use is actually better than a ban in their opinion. It must be however noted that all honey producers were in favour of complete ban of these chemicals.

It was mentioned that Fairtrade should also focus on reducing usage and implementing alternatives first before including them in the Red List. Prohibiting the use of all these pesticides was not felt practical to implement and that it will be very demanding for some crops/regions and that many SPOs and large farms will find it impossible or too expensive to comply with. A lot of support will be needed to help small producers and, to a lesser extent, large farms. Many times, these neonicotinoids are used as seed treatment and this may be out of control of vegetable and flower production and therefore, Fairtrade will also need to specify this aspect in the inclusion of these materials in the Red List.

Neonicotinoids as a group has been suggested as an important part of the integrated pest management strategy, since they are very effective. This group of pesticides has been stated as indispensable for control of thrips and other sucking pests in flower production, control of greening of citrus, aneolamila control in sugarcane, borer in coffee, colaspis beetle in banana. It was noted that these chemicals are most effective at high pest intensity like those of thrips, whiteflies and caterpillars which if slow acting molecules are used will lead to huge product damages.

There were also opinions that not all of these bee toxic pesticides are banned in EU and conditional use is allowed. There was one comment that these are only recommendation of Greenpeace and that there are other pesticides which are more toxic to bees in terms of LD50 compared to these listed pesticides and these have not yet been included in the Greenpeace list. This list therefore can change and Fairtrade will have to keep changing its own list. Some comments suggested that, they were cultivating crops such as tea and sugarcane and this criterion was not applicable to them. A respondent from the market side remarked that they find traces of Imidacloprid, Thiametoxam, Cypermethrin often on Fairtrade roses from Kenya and were concerned on how effective the ban will be on these commonly used pesticides and there are chances of Fairtrade losing credibility if these are found on analysis.

The NGO concerned with pesticides was of the opinion that these pesticides should be at the least prohibited from use on the young plant/ plant producers and traders. In particular after the Greenpeace campaign against these materials, these materials are a hot spot both in the purchasing departments of retail and civil society/ environmental organizations like Greenpeace.

2.3.6 Paraquat

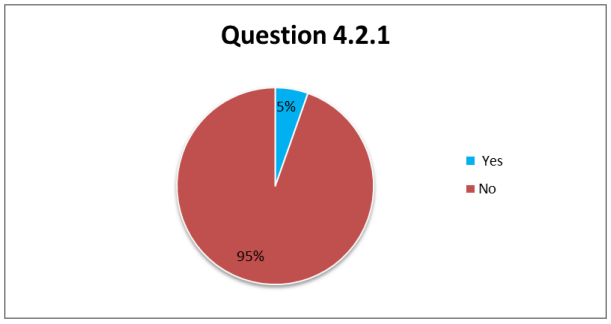
4.2.1: Do you presently use Paraquat (in any of its form) for weed control in your production area

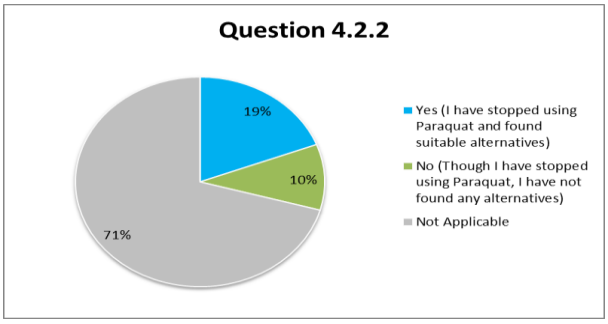
4.2.2 : In case you have stopped using Paraquat in the past, have you found a suitable replacement or cultural practice to control weed

4.2.3 : In your opinion, what are the reasons that you perceive that makes it very hard or impossible to phase out Paraquat

The set of questions mentioned above are related to the use of Paraquat and are discussed collectively in this section.

A total of 277 responses were received for each of the questions in this section. Most of the respondents are not using the Paraquat now. Those who marked yes for the question 4.2.1 (5%) have marked that they have stopped using in the question 4.2.2. Thus it is not clear if they are using it now.. This question was specifically added in this consultation, as a higher number of non-conformities on PML in the past were due to use of Paraquat. This is indicated in the 10% of the respondents numbering around 28, have found no suitable alternatives to Paraquat though they have stopped using them.





They reported that they were able to substitute Paraquat with other methods of weed control namely pre-emergent chemicals, dry leaves mulching and cultural practices like hand weeding or use of alternative weedicides like Glyphosate, Glufosinate ammonium (Basta), Ametryne and Diuron. Of these Glyphosate (Round up) is the most frequently used alternative, while Glufosinate ammonium (Basta) is a proposed Red List candidate. One opinion was to eliminate all exceptions granted as it has been in the Red List for years. There was an unfortunate report of having to abandon certain areas in the farm due to growth of weeds resistant to other active ingredients.

Parquat is still used by a respondent as a devitalization agent for exports to Australia as a quarantine requirement. It is considered as a very efficient and cheap weedicide and thus is favoured by farmers. Since it is a quick kill contact weedicide, there is no danger of kill of unintended crops by translocation through roots. Lack of adequate, practical and crop/location specific advice on alternative weed management, especially for tea in monsoon climates is considered an issue, while, in South Africa it is said to be very effective in quickly killing weeds to protect crops from competition from weeds in drought like conditions. Weeds species resistant to Glyphosate were reported in the orange groves in Brazil and the alternatives to Paraquat were mentioned as not as effective (as Paraquat is a broad spectrum weedicide) and the economics involved in other methods or weedicides may reduce their competitiveness in market. A request was made to allow it in banana as it did not result in any residues in product and is an effective contact weedicide.

2.3.7 Other Comments

(5.1 Do you have any other comments or feedback regarding this consultation and proposed changes? Are there any further additional requirements, which you feel should be added or amended in the PML? Have all the main issues been addressed? Please explain)

Most of the respondents were positive with the consultation process and there is appreciation to the fact that review of the PML is being done in a consultative way. Many expressed that almost all the main issues seem to be addressed. The general view was that the list is longer than the past and some feel that it will be a challenge to producers to comply with the tougher list and it will take some time for the producers to adapt and find reasonable substitutes. There was a concern raised that as growers succeed in phasing out all those listed chemicals, Fairtrade will bring a new list which is even stricter. One respondent was of the opinion that Fairtrade should not set stronger rules than international conventions and allow national laws do it. It was reported that in certain African countries and Costa Rica, it can take a long time for introduction of new pesticides and producers therefore will be forced to use what is available and they will find it hard to find suitable replacements.

It was felt that all improvements are only possible over a period of time and sustained effort and field staff in different regions should help the producers in compliance with this requirement or it will be impossible for Fairtrade producers to keep up their production and compete on the market. Fairtrade should have to campaign to raise awareness of farmers to undertake the Integrated Management of pests and diseases and on proper timings and methods for pesticide use.

One proposal was the Fairtrade should have a list of those chemicals that effects human health, wildlife or environment through accumulation due to extended period of use, which would indicate how long certain molecules can be used without causing damage. Some suggestions that were put forward were: **a)** Make available a web-based list with the most common products containing prohibited active ingredients, **b)** Introduce an appeal in the PML to strategically work on the replacement of any (not only most toxic) pesticides as they affect health of the community and the environment and provide links to existing web-based support and information tools assisting the development of alternative/organic pest control approaches and motivate Producers and Support staff to consult these pages. e.g. http://www.oisat.org/what_is_oisat.html, http://www.pesticideinfo.org/Alternatives.html **c)** Establish more transparency on exceptions by publishing it on web and make it more accessible for Fairtrade staff (FI, NFOs and PNs) and others **d)** and formally oblige exception seekers to actively inform the buyer and the supply chain if exceptions are granted **e)** In case it is decided later that, materials which are proposed to be on the Red List in this consultation are removed from the list, then they should come into a separate list of materials that must be phased out within clear timelines **f)** Fairtrade should plan, provide resources and roll out programs with a clear country and/or product scope to support producer in hot spots in the phasing out of prohibited materials and introduce best cultivation and alternative protection practice **g)** Additional costs for more expensive (modern) pesticides must be considered in the calculation of the COSP.

One respondent summed that, it is positive to have a stricter list from a sustainability point of view, but the challenge will be its adaption on the farm and how compliance will be ensured and warned that banning pesticides without help in adapting farming practices will increase the number of non-conformities

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Annexure

Annexure

Annex 1 Consultation document for Fairtrade Stakeholders: Review of the Prohibited Materials List (PML) (http://www.fairtrade.net/fileadmin/user_upload/content/2009/standards/documents/2015-12-15_PML_consultation_Final_EN.docx)