

<b>Consultation Results Synopsis Information to stakeholders on the outcome of the Revision of the Prohibited Material List (PML)</b>	
<b>To</b>	Certified Producers, Producer Networks, NFOs, Fairtrade International Staff, FLOCERT
<b>Consultation Period</b>	16.04.2016 – 30.05.2016
<b>Standards Committee Meeting for Decision</b>	July (teleconference)
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## PART 1 Introduction

### 1.1. General Introduction

Fairtrade International Standards Team would like to thank all stakeholders for the time and effort they have put into participating in the second round of consultation on the Review of the Prohibited Material List (PML). The consultation which, was initially intended to conclude on the 16<sup>th</sup> May 2016, was extended for to the end of the month following a request from CLAC, to enable them and their members to widen their participation. In total over 92 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, the Standards Team has gained a thorough understanding on the perception of the stakeholders on pesticides regarding their usefulness and hazards to health and environment. Together with the results of the research carried out by the Standards Team, this information 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 the Standards Team 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](mailto: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 Material 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 was intended for a decision in June 2016
- After an initial research, a draft PML was publically consulted between 15/12/2015 and 15/03/2016. The synopsis of the results of the first consultation is available at ([http://www.fairtrade.net/fileadmin/user\\_upload/content/2009/standards/documents/2016-03-29\\_PML\\_synopsis\\_final\\_EN.pdf](http://www.fairtrade.net/fileadmin/user_upload/content/2009/standards/documents/2016-03-29_PML_synopsis_final_EN.pdf))
- Based on the feedback from the first round of consultation, a second proposal was drafted and was consulted publically between 12 April to 30 May 2016

#### **Project objectives**

The main objective is to revise the PML list, while the specific objectives were 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



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- Update the standard requirements related to monitoring and use of pesticides

***Project phases and timelines***

	<b>Timeline</b>	<b>Activity</b>
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, on request from CLAC
	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	Development second draft for consultation
	Apr 12	Second round of consultation (30 days)
	May 12	Consultation extended to 30 <sup>th</sup> May
	May 30	Closure of 2 <sup>nd</sup> round of consultation.
	July	Synopsis of consultation published
	July	SC Decision

***Participants***

In line with the first consultation, efforts were taken to ensure participation of the widest possible numbers stakeholders and more than 3,500 individual email requests were sent with the consultation document. The PNs, NFOs and FLOCERT were request to extend the circulation of the request and help in the widest possible participation in the consultation process. PAN UK, 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 48 days was allotted for the maximizing response from stakeholders. CLAC also conducted its own workshops and consultations on the proposal in the second round and submitted a consolidated report. This included feedback from 86 organizations linked with CLAC and came from 10 countries and represented 11 products. The organizations that took part in the consultation done by CLAC produce coffee (48), bananas (21), vegetables (6) and other products such as honey, pineapple, orange, sugar cane, papaya, wine grapes, blueberries and oilseeds

***Findings***

Similar to the first consultation, a set of 11 questions were asked in the second round of consultation. The questions were formulated based on the inputs from the first round of consultation. The questions can be broadly classified into **a)** removal of the option of ‘Derogations upon request possible’ **b)** regarding addition of an Orange List and **c)** some changes to the standards involving the PML. There was wide acceptance on the proposal to remove the possibility of ‘derogations of request’ and to replace it with an Orange List, which is a list of pesticides with additional conditions. The Orange List also addresses the apprehensions put forward by respondents in the first consultation, on prohibiting some pesticides which were deemed to be irreplaceable in the immediate future.



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### 1.3. Next steps

The Standards Team will present the results of this consultation and the results of the first round of consultation along with recommendations to the Standard Committee at its next meeting. The SC will make their decision including necessary amendments to the PML at that time. The final PML will be published succeeding its approval by the SC.

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

### 1.4. Abbreviations

CLAC	Coordinadora Latinoamericana y del Caribe de Comercio Justo (Latin American and Caribbean Network of Small Fair Trade Producers)
EU	European Union
IPM	Integrated Pest Management
MRL	Maximum Residue Limit
NFO	National Fairtrade Organization
PAN UK	Pesticide Action Network, United Kingdom
PML	Prohibited Material List
PNs	Producer Networks
SC	Standards Committee
USDA	United States, Department of Agriculture

### 1.5. Annexes

Annex 1 Consultation document for Fairtrade Stakeholders

Annex 2 Prohibited Material List (Draft)

## PART 2 Consultation outcomes

### 2.1. Consultation process

The second round of public consultation on the PML began on 12 April 2016 and was planned to end on the 12 May 2016. A web based survey tool, (SurveyMonkey) was used to collect the feedback from the consultation. The consultation was further extended until the 30<sup>th</sup> of May following request from CLAC for wider response from stakeholders.

Emails were sent to the widest number of respondents, informing them on the consultation. Efforts were taken to reach almost all of our stakeholders and about 3,500 emails were sent. Along with the SurveyMonkey 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. Reminders were also sent to elicit maximum responses. CLAC also organized its own consultation process and compiled the feedback and submitted a report.

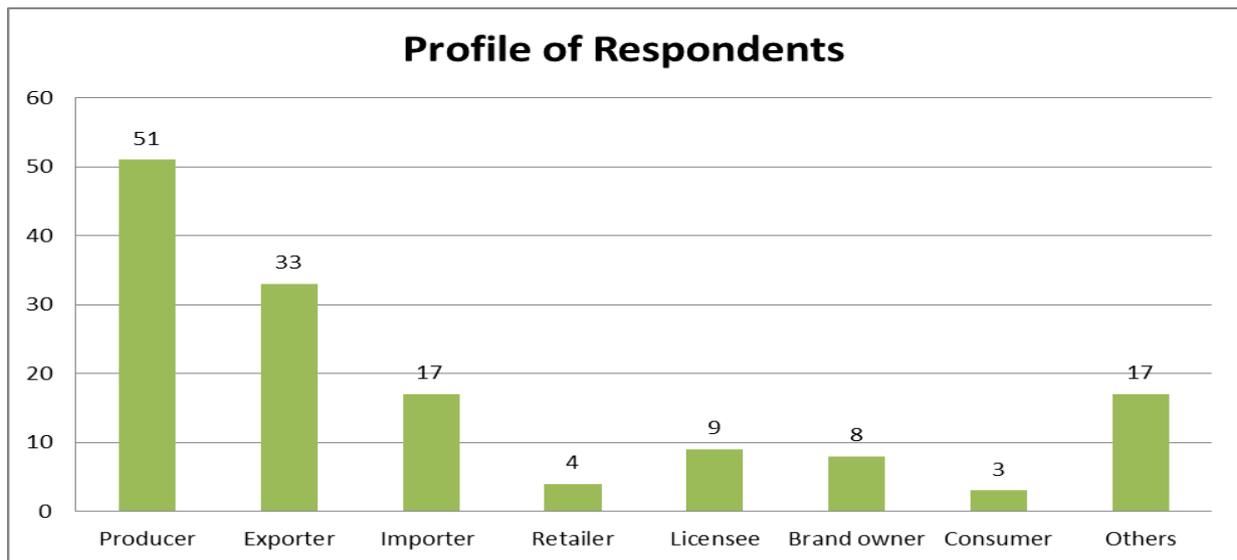
All answers were collated and detailed responses were categorized according to questions



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## 2.2. Overview of stakeholder participants

In total 92 individual responses were received from various stakeholders. This is much lower than the 342 responses received in the first round. This could be due to the fact that, respondents might have felt that they have contributed already and did not find it necessary to contribute again, as this round deals with mainly the materials that were requested to be exempted in the first round. However, since the response is of good quality and covers the different set of products and regions, we can consider the number adequate. The graph shows the extent of participation from different stakeholders.



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

### Geographical distribution of respondents

Country	No of Respondents	Country	No of Respondents
Brazil	10	Denmark	1
Switzerland	6	Dominican Republic	1
Kenya	5	Egypt	1
Cote D' Ivoire	4	El Salvador	1
Netherlands	4	France	1
Peru	4	Guatemala	1
South Africa	4	Indonesia	1
Argentina	3	Lebanon	1
Colombia	3	Madagascar	1
Costa Rica	3	Malawi	1
Ecuador	3	Mali	1
Germany	3	Mexico	1
India	3	Morocco	1
Ghana	2	DR Congo	1
Honduras	2	Rwanda	1
Italy	2	Scotland, UK	1
Mauritius	2	Spain	1
Sri Lanka	2	Sweden	1



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Country	No of Respondents	Country	No of Respondents
Thailand	2	Tanzania	1
Viet Nam	2	Tunisia	1
Belgium	1	UK	1
Belize	1	Uruguay	1
Burundi	1	Unspecified	1

### Products handled by respondents

Argan Oil	Dried Fruits	Pineapple
Avocado	Flowers	Pulses
Banana	Fresh Fruits	Rice
Beans	Grapes	Rose
Carnations	Herbs and Spices	Shea Butter
Cashew	Honey	Soybean
Chocolate	Nuts	Sugar
Citrus	Oil Seeds	Tea
Cocoa	Orange	Wine
Coconut	Orange Juice	Vanilla
Coffee	Passion Fruit	Vegetables
Cotton	Peanut	Young Plants

CLAC conducted its own consultation for the 2<sup>nd</sup> round. During the process, 3 webinars, a workshop in Dominican Republic, 1 meeting of producers in Colombia and 1 other in Brazil were made. In addition, virtual meetings were held to discuss the contents of the proposal. The response to the consultation was perceived to be better than a similar exercise for the first round, as more people took part in the proceedings.

### List of Countries Participating in this 2nd Round of Consultation of CLAC

No	Country	No. of organizations
1.	Dominican Republic	7
2.	Colombia	46
3.	Brazil	17
4.	Peru	6
5.	Costa Rica	2
6.	Guatemala	2
7.	Panamá	1
8.	Uruguay	1
9.	Chile	3
10.	México	1
	<b>Total</b>	<b>86</b>

It must be noted that, some of the members attending the CLAC consultation have also contributed to the online survey and therefore, the statistics of CLAC responses are represented separately.



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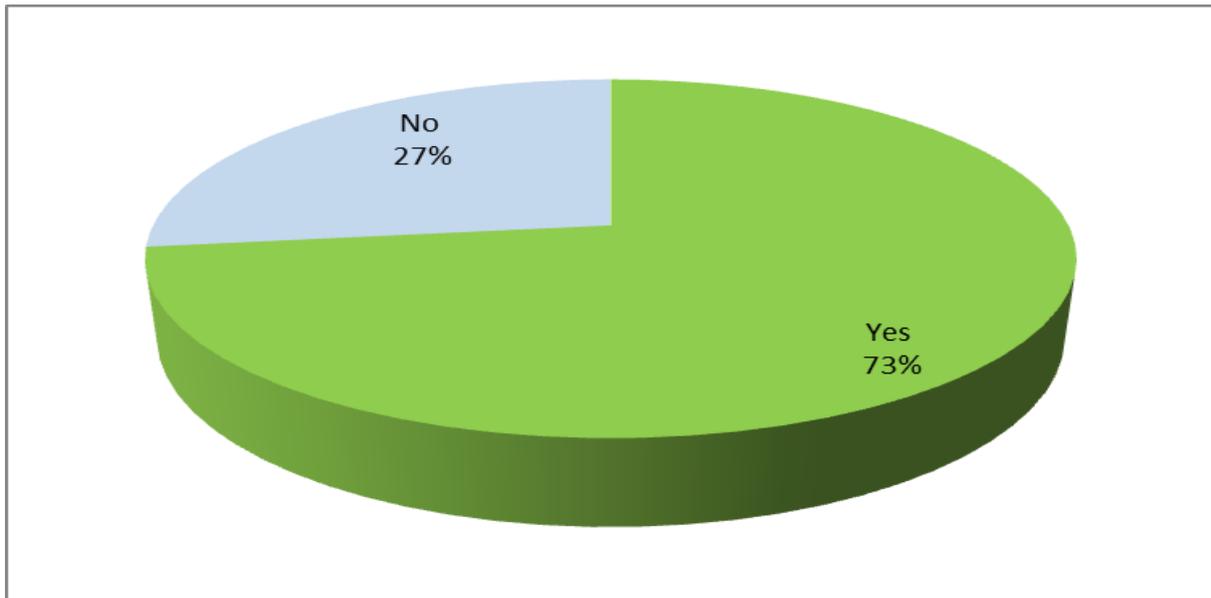
## 2.3 Consultation outcome and stakeholder feedback

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 following part, summarises the responses received against each question and are given under each question.

### Q -1.1 Do you agree with the proposal of removing the option of 'Derogations upon request possible'?

Response	Total	%
Yes	57	73
No	21	27
Grand Total	78	100



The feedback clearly states that most of the respondents (73%) were in the favour of replacing the option of 'derogation upon request possible' with that of the Orange List. Supporting this proposal, there were comments such as: this option provides more transparency; allows for restricted use with a aim to reduce or phase out; has less paperwork thus easier; less need to request FLOCERT; less uncertainty when the period of derogation runs out or when a request is made to FLOCERT and quicker application of pesticides in times of need than to wait for permission from FLOCERT especially when the loss from pests and diseases can happen in very short time.

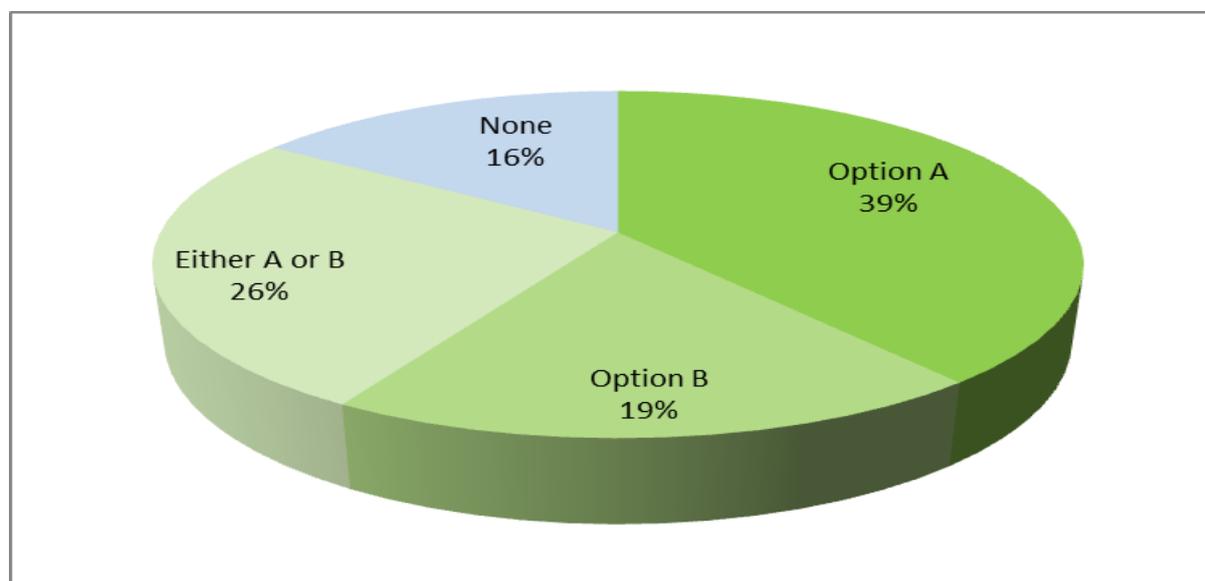
However, there were about 27% of the respondents who did not think that this proposal was useful. Two of the respondents were not happy that some of the chemicals they were using did not appear in the Orange List. Five of them were of the opinion that Fairtrade should not have a higher requirement than the local laws. One respondent was not happy that those harming bees have been allowed in the Orange List as the pesticides harmed their bees. There were also comments that the Orange List allowed for use without discretion or checking for need by the certification body. There was one comment that 'request for derogation' favoured small producers. There were those who did not favour the option as it did not apply to them as they were not using any pesticides.

In the CLAC consultation, 83% of the responses were in favour of the proposal. The following comments were received on this question

- It is the way to eliminate bureaucratic procedure involving FLOCERT
- The Orange List solves the possibility of use of these materials.
- The application of derogation process takes time and crops can be lost to pests, while permission is obtained.
- It is good to have an Orange List with regulations.
- Do not remove an option to have recourse to the use of any material in an emergency.

**Q- 1.2 Do you agree that: a) the buyers should be notified of the use of any pesticide in the Red List for which an exception was given OR b) the crop/product on which the material was applied is not sold as Fairtrade certified if a pesticide in the Red List was used.**

Response	Total	%
Option a	30	39
Option b	15	19.5
Either a or b	20	26
None	12	15.5
Total	77	100



There was a request in the first round of consultation for more transparency in case of exceptions on use of a material from the Red List. This input was consulted upon in the second round, and respondents were asked if they would prefer either informing the buyers on any use of a Red List material through exceptions (option a) or prefer a condition that the products on which a Red List material is used under exceptions are not traded as Fairtrade (option b). The feedback showed that a good majority (84%) of the respondents preferred one or the other option, with 39% favouring the first option, i.e informing the first buyers (option a), while 19 % were in favour of prohibiting sale of any product on which a Red List material was used (option b). 26% preferred either of the two. This shows that there is a higher preference to the extent of 65% for option b. The major reason for support was that it allows for transparency at the same time the flexibility to the buyers regarding purchase. Those favouring option b, did so as they thought that since the Red List materials are prohibited from use,



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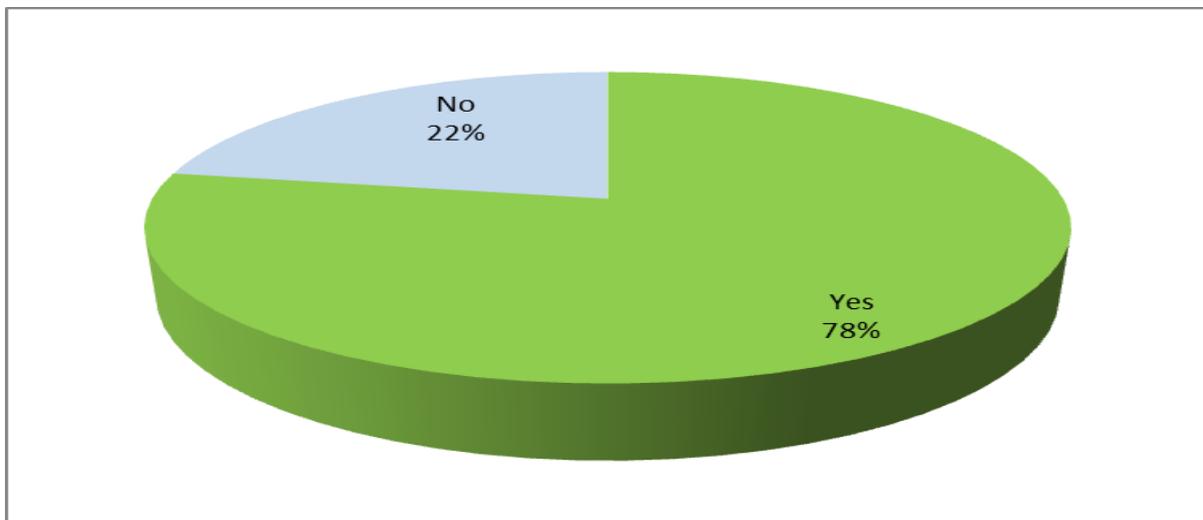
those certified products on which an application of a Red List material is done should be prohibited from sales under all circumstances.

Those who did not favour either of the options did it for varying reasons. One group was of the feeling that, Fairtrade should not have higher requirements than those are allowed legally and lists from EU and USDA and with MRLs, should be enough for compliance. One respondent felt that Fairtrade is an ethical brand and not an ecological brand. The other strong opinion was that, once certified, the products meet the standards and since exceptions are given for a reason, no higher requirement should apply. It was also felt that confidentiality of the operations should be kept intact.

Similar fractured responses were received in the CLACs consultation. 96% of the respondents were in favour on the proposal overall, with 57% did not have a preference of option a over b, while 22% preferred the proposal of informing buyers on any exceptional application of Red List material, while 17% preferred to not sell such products as Fairtrade certified. Some respondents felt that since exceptions may not be given on a Red List, these situations would not appear. Other comments were in line with the comments received in the online consultation.

#### Q 2.1 Do you agree with the addition of the Orange List (Restricted List)?

Response	Total	%
Yes	56	78
No	16	22
Total	72	100



It's clear from the data presented above that, a majority of the respondents were in support of the addition of the Orange List. The most common reason that was stated in its favour was: it is a practical approach, which reflects the reality on the ground and faster interventions are possible. It was also felt that it will increase the awareness of the producers and give them time to move on to less harmful pesticides. Some felt that it will be easier to monitor the usage better with a smaller list. One respondent was of the opinion, that this will remove the uncertainty over the derogation process.

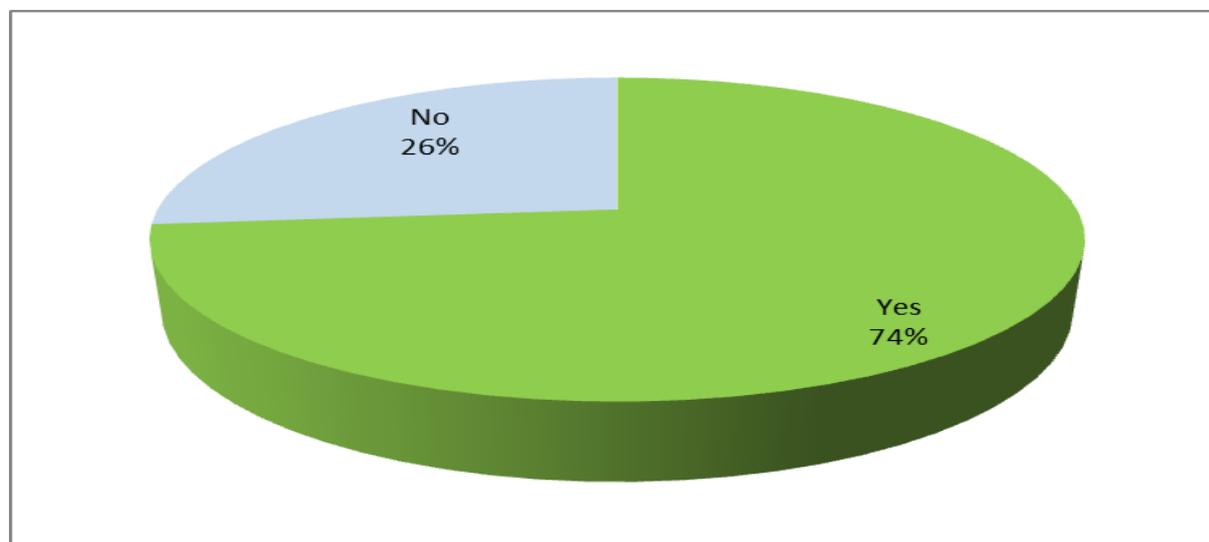
However, there were 22% of the respondents who were not in favour of the Orange List. The reasons given were : too many coloured lists would create confusions; it will be a bit hard to monitor their use and it might be used wrongly; Fairtrade should not have a higher requirement than those stated by EU, USDA etc. and Fairtrade has limited capacity or knowledge for monitoring. Few were unhappy that the commonly used and most necessary pesticides especially in coffee and grapes have been included in Orange List thus, restricting their usage with conditions.

A good majority (83%) of the respondents in the CLAC survey, were in favour of adding the Orange List to the PML. The following comments were received on this question:

- It is good because there are materials that can be replaced immediately and efforts can be made to reduce their use.
- Allows use of a product in special or emergency cases.
- If there are three lists, the materials should move from Amber to Orange and Orange to Red unless there is a confirmation that shows that there are active ingredients with high levels of toxicity to place them in the Red List.
- The Orange List should contain deadlines for the use of materials.
- There should be consultation with producers before moving the Orange List material to the Red List in the future.
- Having a Red List without exceptions is very good for end buyers and gives more transparency and security.
- It is good that these materials are allowed for use in case of need, as there may be more situations emerging from climate change, which increases incidence of pests and diseases.
- This ensures that there are more alternatives which can be used, but under control.

#### Q 2.2 Do you agree with the criteria for classifying materials in the Orange List?

Response	Total	%
Yes	50	73.5
No	18	26.5
Total	68	100



Nearly 3/4th of the respondents were in agreement on the criteria used for classifying the materials to the Orange List. Comments, such as clarity of criteria and its adherence to the basic knowledge of produces were mentioned in favour of the criteria. It was felt that it will help farmers to develop strategies to minimise use of these pesticides and promote good practices like Integrated Pest Management (IPM). However, one respondent felt that though they are supporting the criteria, it is not clear on who and how the monitoring on usage will be done.

There were also some strong opinions against the criteria. One felt that the criteria are confusing while another felt that it will be misused and will be difficult to monitor. There was one opinion that, it allows for regular use of such harmful material where it should be only used under exceptional conditions. There was one opinion that all the materials are equally toxic and should be placed in the Red List,



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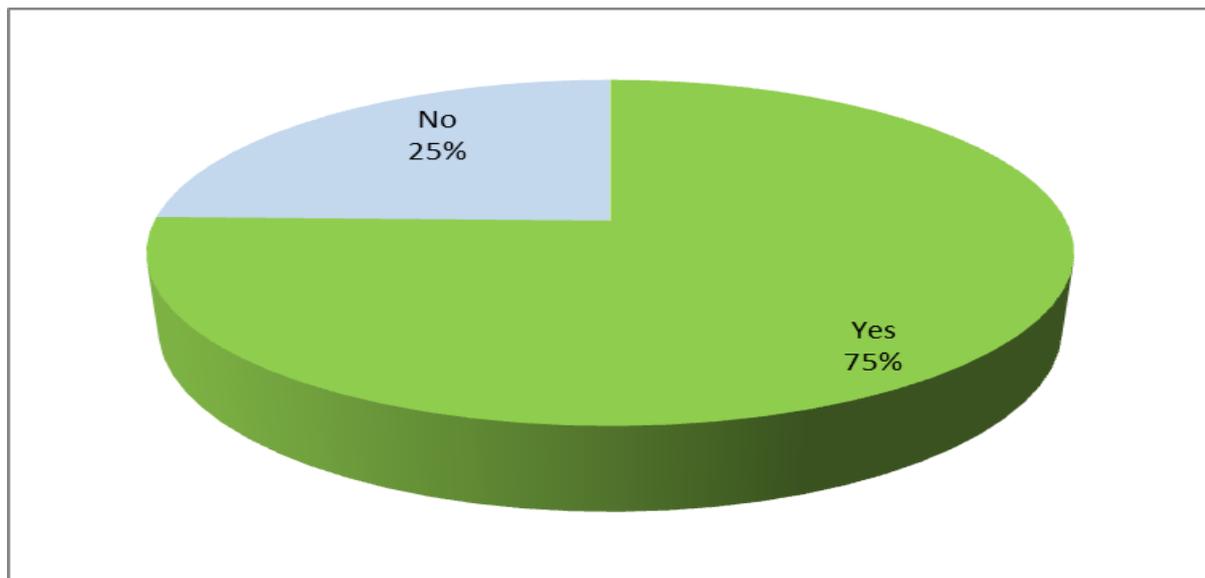
while one favoured placing all of them in the Amber List. There were one disagreement on the basis of one pesticides used commonly by them for avocados does not find itself in the Orange list. While the other felt that all the most commonly used pesticides are in the Orange List making it difficult in compliance for them. One respondent wanted Amritaz on the Amber list.

There was also support of the majority (83%) in the CLAC consultation for the criteria.

### Q 2.3 Do you agree with the general conditions for the use of material in the Orange List?

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

Response	Total	%
Yes	52	75
No	17	25
Grand Total	69	100



There was a high degree of agreement on the general conditions proposed under which the Orange List materials are to be used. The respondents felt that it was useful in increasing awareness among producers and promote responsible farming and care for the workers and environment. It also helps in limiting abuse of chemicals that are known as harmful. Others felt that it will be useful to train the workers or members on proper use. It was also felt that it will help in following more stringent global standards, so that it meets the regulatory requirements of all countries. Some suggestions were proposed by the respondents. Clarity on greenhouses was requested as some tunnel planting allows access by bees. It was suggested to restrict informing the certification body, to once annually rather than inform them whenever a material was used.

Similar to the question 2.2, a quarter of the respondents were against the conditions proposed. The reasons were also on the similar lines. Some respondents felt that Fairtrade should not have any extra criteria than those allowed under EU and USDA regulations for import. Some felt that the conditions could be perceived as complicated and difficult to monitor. Some were unhappy that certain pesticides used very commonly are in the Orange List. Two of the respondents felt that it is not necessary to inform the certification body prior to use and the certification body can check for compliance during audits. One respondent felt that they do not have any other pesticide that can be used as the first



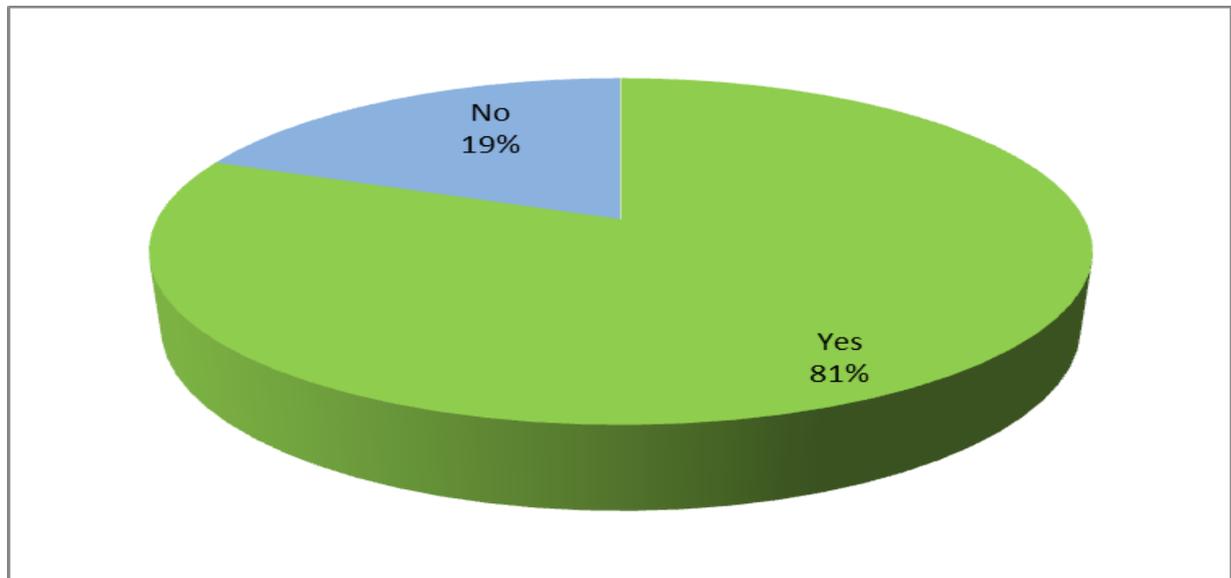
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option and all materials they use are in the Orange List. Two comments indicated that all harmful chemicals should be in the Red List and should not be used under any conditions.

Eighty three percent of the respondents, who responded to this question in the CLACs consultation, were in favour of the general conditions. The supporting comments were that, the materials can be used as a last alternative and users can make strategies for future elimination of these materials.

#### Q 2.4 Do you agree with the specific conditions for individual material in the Orange List?

Response	Total	%
Yes	55	81
No	13	19
Grand Total	68	100



There was a very high degree of support to the specific conditions and 81% of the respondents favoured the specific conditions against which some groups of materials are to be allowed for use. Comments showed that, they perceived the conditions as practical and allowed for quick application when in need.

Apprehensions were raised by some who did not agree to the conditions. Few of them were of the opinion that the conditions will be difficult to be monitored. One respondent felt that it would not be feasible to monitor apiculture around the production area and also to monitor bee mortality in the production area and these should not be in the set of conditions. There was a request to include Amitraz to the Amber List instead of the Orange List.

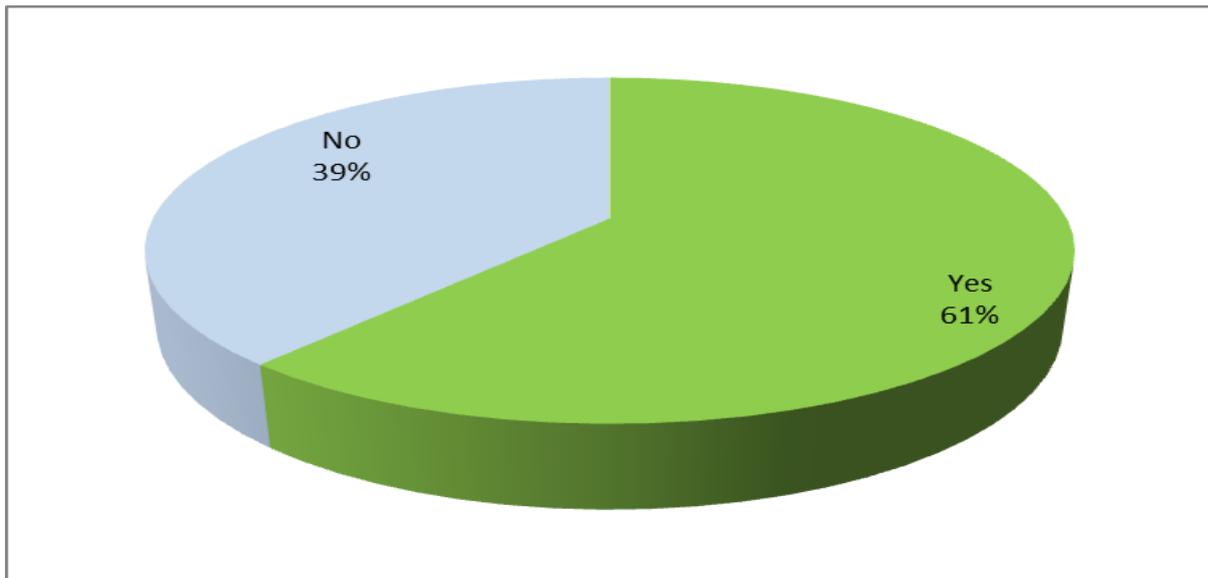
The CLAC consultation, however, showed that the majority (59%) did not like the specific conditions especially over the use of the bee toxic Greenpeace 7 pesticides. One comment was that the covers used in banana are impregnated with Chopyrifos, Crypermethrin, Bifenthrin and this could cause problems and it is best to remove the specific condition altogether. One respondent from Peru did not understand the rule of application a month before peak flowering. One respondent also felt that the flowering period is the critical moment of the crop, where several pests attack and applications will be needed during this period. One respondent favoured to place Amitraz in the Red List, while two respondents wanted them to be placed in the Amber List.



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**Q 2.5 Do you agree that Glyphosate is included in Orange List (restricted list) under general conditions?**

Response	Total	%
Yes	43	61.5
No	27	38.5
Grand Total	70	100



Majority of the respondents to the tune of 61% are in agreement in adding Glyphosate to the Orange List, with the aim of monitoring its use. Analysing the comments, indicate that, most of them agree it to be placed in the Orange List than the Red List. However, some felt that it is better way of monitoring as it is a harmful chemical and raising awareness.

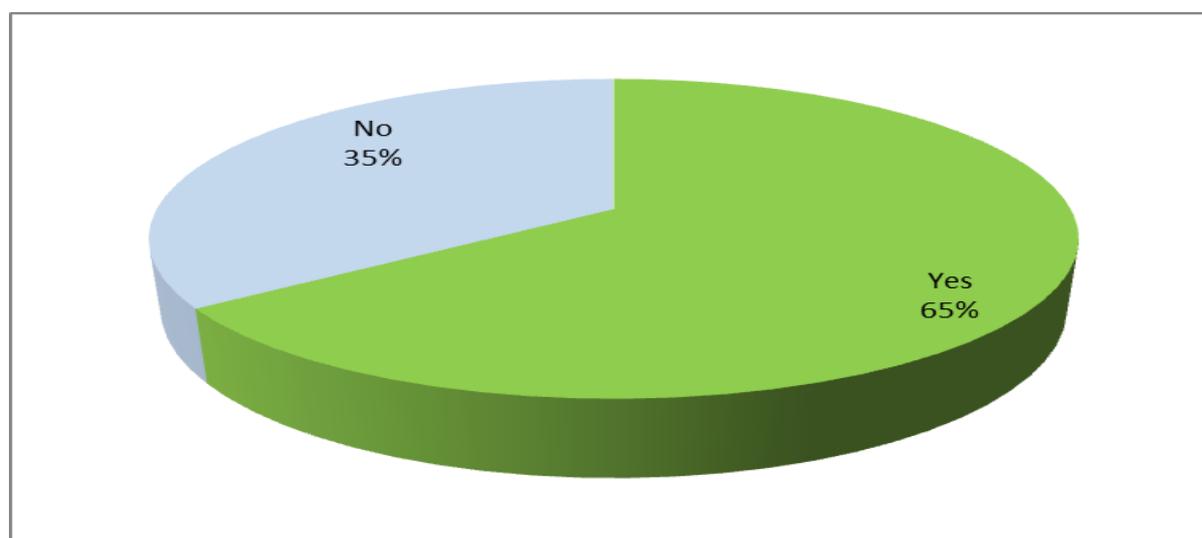
Out of the 27 (39%) feedback showing opposition to the proposal, 12 of them wanted Glyphosate to be placed in the Red List, while the remaining wanted it to be placed in the Amber List. This shows a great extent of opposing opinion in case of Glyphosate. Glyphosate has been mentioned as the preferred alternative to Paraquat (which is prohibited) and some producers see it as indispensable. Some comments suggest to place it in the Amber List currently and since the studies and discussions on the carcinogenic nature of Glyphosate is going on; it would be prudent to wait until the next revision before deciding on placing it in other lists.

87% of the respondents in the CLAC consultation, were in favour of placing Glyphosate in the Orange List. Some of the comments received are as follows

- It does not affect banana production, as its use has been reducing through IPM.
- In pineapple Glyphosate is normally not used. It is however, used in coffee but as last alternative.
- We agree to place it in Orange List, as it allows the use of Glyphosate. However, there is concern that currently there are no suitable substitutes.
- Glyphosate is the only known material to control perennial weeds.
- The results of research in Europe are not definitive and the cost of managing weeds manually is very high especially when there are periods of rain. No other options available in the market as an herbicide in coffee.
- There are no alternatives for the weed control and is coupled with the low cost, when compared to other alternatives.
- According to the manufacturer it is green label low toxicity.

## 2.6 Do you agree with the materials in the Orange list

Response	Total	%
Yes	45	65
No	24	35
Grand Total	69	100



There is general agreement on the materials listed in the Orange list and 65% of those who responded to the question were in agreement. They support this as it is felt it would raise awareness and it will help in monitoring and reduce use of these harmful materials.

35% of the respondents were not happy with the materials in the Orange list. A grape grower from India, opined that table Grapes is sensitive crop to pests and diseases, and only few pesticides are recommended and pesticides like Fipronil, Carbendazim, Imidacloprid, Mancozeb, Thiamethoxam, Flusilazole cannot be avoided, similar request for the above pesticides are reported by rice and passion fruit growers. However, this concern is not valid, since these are allowed for use under conditions in the Orange List. There is a strong request for inclusion of Beta-cyfluthrin into the Orange List, which is currently placed in the Red List. There were two requests to remove Amitraz from the Orange List and keep them in the Amber List as there are no alternatives for conventional honey production. There were two comments, suggesting that all pesticides should be in the Red List. There were also requests to add Glyphosate into the Red List. One respondent felt that, it would be impossible for one to say if the list is adequate as the knowledge on these matters are low on the producers side.

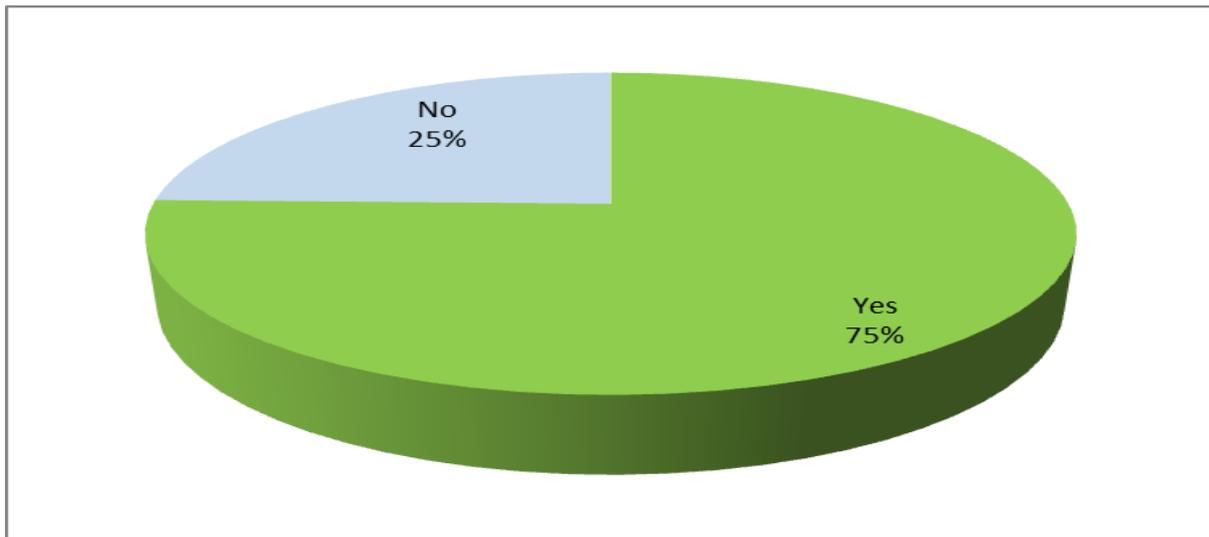
There was a majority support for the materials in the Orange List in the CLACs consultation. Though most favoured (73%) the List, there were some opposition also. One opposing comment was that there are no provisions to allow low cost alternatives like Methomyl and Paraquat. Others were happy that their requests for exclusion from Red List have been taken into consideration.



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**3.1.1 Do you agree with the annual updating of the list of pesticides used for production of the Fairtrade crops (from the previous requirement a minimum of once in three years)?**

Response	Total	%
Yes	49	75
No	16	25
Grand Total	65	100



Three fourth of the respondents who responded to this question favoured annual update of the pesticides list. It was felt that this was a good practice and some felt that this was irrelevant to them as they are already doing this. It was felt that this will increase awareness to the producers and three years was a long time and a lot of pesticides change.

The opposing comments, wanted to maintain the 3 year period. One respondent felt that as the same pesticides are normally used on a continuous basis, there is no need to update the list every year. Other felt that it is enough to do the updating whenever, a new pesticide is used. One respondent who is also certified for GlobalGAP, felt that a keeping it a three year period is apt for technical management as GlobalGAP specified a two year period.

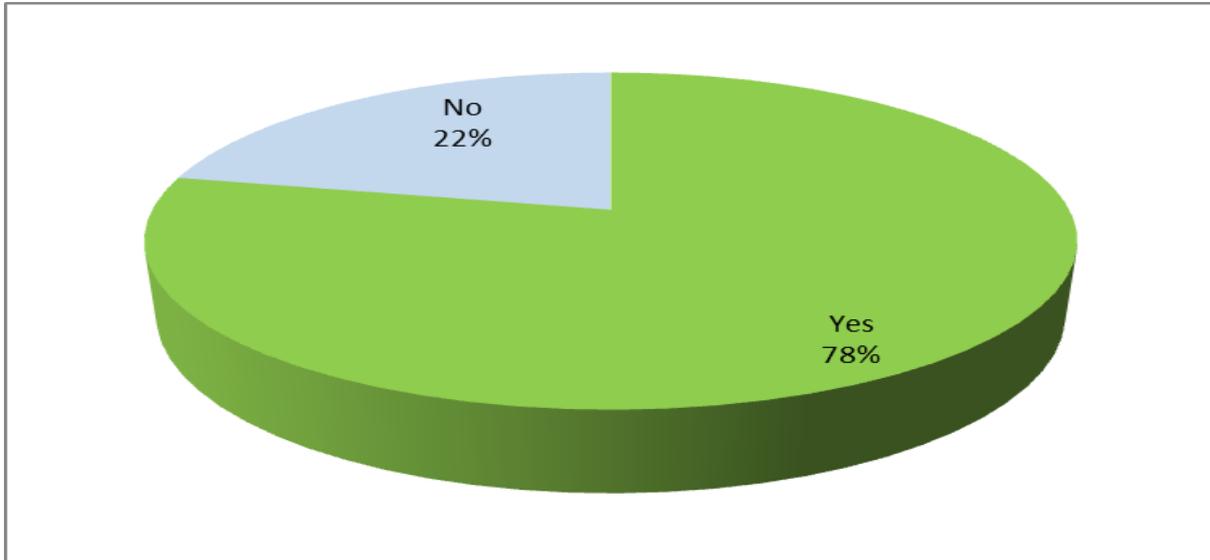
78% of the respondents in the CLAC survey were in favour of annual updating of the pesticide list. however, some felt that it need not be done annually and only done when new pesticides are used, while other preferred a biennial updating.

**3.1.2 Do you agree with detailing the requirements in the list (name of the active ingredients, formulation, commercial name and manufacturer, crop/product on which they are used and the targeted pests)?**

Response	Total	%
Yes	54	78
No	15	22
Grand Total	69	100



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A majority (78%) of the stakeholders, who responded, were favourable to the proposal of detailing the information required in the list of pesticides required in the standard. They felt that this will be helpful in avoiding confusion and also help in the producer knowing better the chemicals that are used. Those not in favours felt that it was too much to require from farmers and the details are too complicated. Most apprehensions were raised on the inclusion on information on the manufacturer and thought that this was not important. One respondent suggested that either the commercial name or the active ingredient is requested as information on both may not be there with the farmers.

87% of the respondents in the CLAC survey were in favour of detailing the requirements in the pesticide list. They thought that this is a good practice. Some of the comments received are as follows

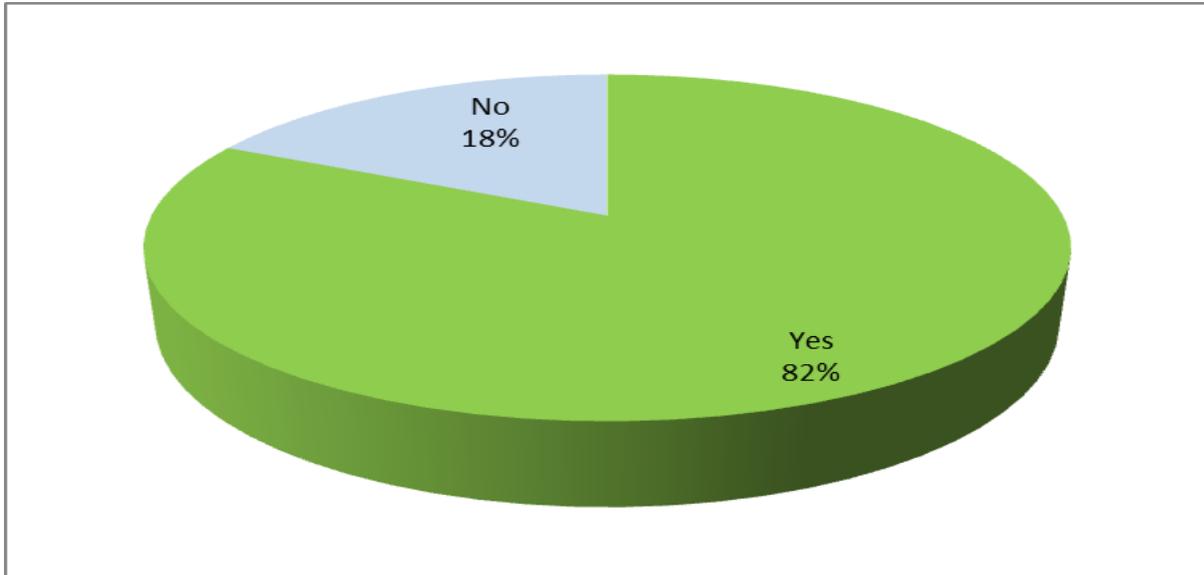
- The details do not include the dose and it is a good thing to be requested.
- It is good practice to ensure proper use of the product and for good management. Information should be as complete as possible, so that users have information to make the best decisions on use of various plant protection materials.
- The clearer the information, the better for the proper planning and avoids errors and misunderstanding.
- It gives more transparency
- It is very important to know the active ingredients and trade names and used to avoid mistakes of application.

**3.2.1 Do you agree that the clause that ‘only legally allowed pesticide should be used and on the approved crop and purpose’, is added to the standards?**

Response	Total	%
Yes	60	82
No	13	18
Grand Total	73	100



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INTERNATIONAL



There is a majority support for introducing the requirement for restricting the use to only legally allowed pesticides in the producing countries. This along with the other standard requirement in the standard was perceived by the respondents to be use in biding with the law. One respondent felt that this requirement was obvious as laws should be followed at all times. It was also mentioned that this gives credibility to the certification and to sanction those who do not comply.

Those who did not support the introduction of this clause in the standard, put forward comments such as: some natural/biological pest control measures, may not have any legal proof of approval and this could be interpreted as a non-conformity during audits; there could be situations where safe pesticides have still not got a legal permit in the underdeveloped parts of the world and their use can still be considered safe; the other comment was that the limits of MRL in the importing countries should be enough and Fairtrade should not have requirements on pesticides.

There was unanimous support from the respondents who responded to this query in the CLACs consultation.

## **Annexure**

**Annex 1** Consultation document for Fairtrade Stakeholders: Review of the Prohibited Materials List (PML)

**Annex 2** Prohibited Material List (Draft)