



COTTON MADE IN AFRICA

Position Paper: Reasons not to explicitly refer to the PAN Dirty Dozen in the CmiA Exclusion Criteria

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The pesticide Action Network (PAN) launched the campaign on the so-called “Dirty Dozen” in 1985. It was the first global effort of PAN International to take action on some of the most harmful pesticides. The global attention led many countries to ban or restrict Dirty Dozen pesticides. Since the mid-1980s PAN kept up the pressure for international attention on pesticide related problems. In 1998 the Rotterdam Convention on Prior Informed Consent (PIC Treaty) was signed, and in 2001 the Stockholm Convention on Persistent Organic Pollutants (POPs Treaty) was agreed upon. Both Conventions became international law in 2004.¹ Of the 18 pesticides targeted by the Dirty Dozen Campaign, 16 of them are meanwhile covered either by the PIC Convention or the POPs Convention, some of them even in both conventions. Seven of the 18 Dirty Dozen pesticides are today considered obsolete (see Annex).

The work of PAN therefore does not focus on the Dirty Dozen anymore. The organization itself stresses the campaign character of the Dirty Dozen – a campaign which has finished and has achieved its objectives by the implementation of the mentioned international conventions. This all happened before the Aid by Trade Foundation program started. At the same time, PAN currently focuses on so-called Highly Hazardous Pesticides (HHPs). The organization demands a progressive ban of such highly hazardous pesticides. The criteria for the definition of Highly Hazardous Pesticides by PAN cover various toxicity parameters, amongst them, pesticides classified as extremely or highly hazardous by the World Health Organization with respect to their acute toxicity for humans (WHO class Ia, Ib).

From the beginning, the Aid by Trade Foundation prohibited the use of pesticides covered by the Stockholm Convention, listed in Annex A, and pesticides listed in Annex III of the PIC Convention. Thereby even if not explicitly mentioned in the Standard text, there is a de-facto prohibition of 16 of 18 PAN Dirty Dozen pesticides in place. From the remaining two pesticides, DBCP does not play a role in cotton production, while the use of paraquat is and will be closely monitored during self-assessments and verification processes of the CmiA producing cotton companies.

With the CmiA Standard Version 2.1, since January 2013, the Aid by Trade Foundation extended the exclusion criteria to pesticides that are classified WHO Ia and Ib. This step

¹ PANNA: PAN Victories: Three decades of making a difference, online available at <http://www.panna.org/about/PAN-Victories> (accessed 28.02.2014)



brought 71 new substances to the exclusion list, accounting a total of 104² prohibited substances.

This step is in line with PAN’s requests to progressively ban highly hazardous pesticides, and considered by AbTF much more up-to-date than the addition of PAN Dirty Dozen pesticides.

Furthermore, the AbTF considers the exclusion of specific substances only as one part of reducing the risks connected to the use of pesticides. Close monitoring of pesticide use data and assessing a total toxic load arising from pesticide use, farmers training on safe pesticide use, and most importantly, steps to implement Integrated Pest Management strategies form part of AbTF strategy to support African cotton farmers.

1. Table 1: PAN Dirty Dozen Pesticides status in POP Convention and PIC Convention

Pesticide (Active Ingredient)	POP Convention	PIC Convention
Aldicarb		✓
Chlordane	✓	✓
Heptachlor (OBSOLETE)	✓	
Chlrodimeform		✓
DBCP		
DDT	✓ ¹	✓
Aldrin (OBSOLETE)	✓	
Dieldrin (OBSOLETE)	✓	
Endrin (OBSOLETE)	✓	
EDB		✓
HCH/BHC		✓
Lindane	✓	✓
Paraquat		
Parathion		✓
Methyl-Parathion		✓ ²
PCP		✓
Toxaphene (Camphechlor) (OBSOLETE)	✓	
2,4,5-T (OBSOLETE)		✓

2. 1) DDT is listed under Annex B, which foresees a Restriction in its use – it is only acceptable for disease vector control (Malaria prevention)

² 12 of these 104 pesticides are considered obsolete. For transparency reasons, these obsolete pesticides are still listed in the CmiA Prohibited Substances List.



3. 2) Methyl-Parathion is listed in the PIC Convention under severely hazardous pesticides formulations (SHPF) – that means specific formulations are covered by the Convention only. In case for CmiA any use, independent from formulation and/or concentration is prohibited as it is a WHO Class Ia pesticide.
4. Sources: PAN Dirty Dozen listed in PAN UK's List of Lists http://www.pan-uk.org/attachments/077_List%20of%20Lists_2009.pdf ; Stockholm Convention (POP Convention) <http://chm.pops.int/TheConvention/ThePOPs/ListingofPOPs/tabid/2509/Default.aspx>; and Rotterdam Convention (PIC Convention) Annex III at <http://www.pic.int/TheConvention/Chemicals/AnnexIIIChemicals/tabid/1132/language/en-US/Default.aspx>