

PAN Interventions on Chlorpyrifos
5th May 2025

Sheila Willis, Head of International Programs, PAN UK

Thank you, Mr President.

I'm speaking on behalf of Pesticide Action Network International and PAN UK.

Chlorpyrifos is a toxic pesticide that harms the brain development of children and causes significant harm to farmers, communities and the environment.

Almost 50 countries have already banned or severely restricted the use of chlorpyrifos, and many safer alternatives are available.

The final regulatory action on chlorpyrifos in the European Union, Malaysia and Sri Lanka was based on the evaluation of the hazards and risk to human health, the environment, and to prevent harm.

The Rotterdam Chemical Review Committee of experts has also determined that all the requirements for listing in Annex III to the Rotterdam Convention have been met and has recommended it for listing.

As we know, listing substances in Annex III to the Rotterdam Convention does not prevent trade but rather provides parties with access to information and shared provisions to enable them to manage trade more safely.

Chlorpyrifos is now listed in Annex A to the Stockholm Convention for global elimination, though with specific exemptions. It must now be listed in Annex III to the Rotterdam Convention to facilitate information exchange and to ensure that chlorpyrifos is only exported to countries that have provided Prior Informed Consent for allowed uses.

PAN therefore urges parties to list this pesticide in Annex III in order to better control this harmful POPs pesticide for the protection of human health and the environment.

Thank you, Mr President.

PAN Interventions on Paraquat
5th May 2025

Dileep Kumar, CEO PAN India

Thank you, Mr. President,

I am representing Pesticide Action Network International and PAN India.

Paraquat exemplifies the current problematic situation with the listing of pesticides and other chemicals in annex III to the Rotterdam Convention. Paraquat has high acute toxicity with no antidote available; hence, making it difficult for the medical community to save the lives of poisoned people, a number of poisonings and fatalities have been reported in the past where it is extensively used. For these reasons, it is already banned in 72 countries.

The report of the Chemical Review Committee points to final regulatory action notification from several parties meeting the Conventions Criteria.

PAN would like to emphasise that the substances listed in Annex III to the Rotterdam Convention enable parties to have access to information, share provisions to enable them to make better informed decisions, and do not prevent trade and use. And despite having met with the Convention's criteria, a few parties preventing the listing of paraquat in Annex III, COP after COP, is not a welcoming precedent, and it is undermining the Convention's integrity and objective.

In light of the previously mentioned adverse effects on human health and the environment, we recommend that parties replace this toxic weedicide with effective non-chemical alternatives.

To conclude, PAN urges all parties to accept the long-pending recommendations of the Chemical Review Committee to list paraquat in Annex III of the Rotterdam Convention to enable informed decision-making that can help parties to prevent continued harm to human health and the environment and uphold the objective and integrity of the convention.

Thank you, Mr President.

**Intervention on UNEP/FAO/RC/COP.12/CRP.4
5th May 2025**

Sheila Willis, Head of International Programs, PAN UK

Thank you, Mr President.

I'm speaking on behalf of Pesticide Action Network International and PAN UK.

The proposal fundamentally weakens the Convention.

If adopted, the CRP 4 would:

- establish a new poorly defined and mandated quasi-decision making subsidiary body. This would require new resources and would exert new forms of control over work of the Chemical Review Committee (CRC) that advises the Convention;
- illegitimately weaken long-established and universally accepted UN guidance on Highly Hazardous Pesticides (HHPs) that are beyond the scope and mandate of the Convention;
- put up illegitimate barriers to the rights of developing and low and middle income countries to submit notifications of final regulatory action and proposals for Annex III listings of Severely Hazardous Pesticide Formulations, by raising the technical requirements of those actions in ways that sweep aside the long-standing procedures and criteria already agreed by the Convention;
- prevent future listing of certain hazardous chemicals under the convention

It must also be rejected outright.

Further, CRP4 para. 3 encourages Parties to engage in dialogue with private standard-setting bodies and certification schemes to clarify that listings in Annex III are intended to facilitate informed decision-making in international. We would like to point out that failure to list certain hazardous chemicals will not prevent PVS taking steps to improve safety and sustainability in certified production. The example of paraquat is clear. A small number of countries have repeatedly blocked its listing under the Convention – and some have pointed to the use of

“Rotterdam status” in PVS as a reason for their opposition – yet all nine of the major PVS have already prohibited it; some did so decades ago. The continual blocking of new listings under this narrative is simply denying information to Parties wishing to better control these chemicals while having no bearing on the decisions of the PVS. There is no evidence that listing a pesticide under Annex III has had a negative impact on the trade of produce on which that pesticide has been used. The pesticides proposed for listing are restricted or prohibited by multiple PVS already.

The effectiveness of the Rotterdam Convention has been stymied for years by a minority of Parties which repeatedly block Annex III listing through unilateral or minority veto, for reasons not relevant to nor justified by the Convention.

We call on the Parties to defend the convention and reject this proposal.