ALLIANCE FOR SUSTAINABLE & HOLISTIC AGRICULTURE (ASHA)

Food • Farmers • Freedom

To:
The Joint Secretary,
Plant Protection,
Ministry of Agriculture & Farmers' Welfare,
Department of Agriculture, Cooperation & Farmers' Welfare,
Krishi Bhawan, New Delhi 110 001.

Date – 4th August 2020

Dear Sir,

Sub: ASHA's response on the draft Restriction of use on Glyphosate Order 2020 - reg.
Ref: Notification No. S.O. 2268(E). Dated 6th July 2020

Greetings! This is with regard to the draft Restriction of Use on Glyphosate Order 2020 put out on 6th July seeking public comments of objections, suggestions etc. This is to convey the response of Alliance for Sustainable & Holistic Agriculture (ASHA) on this matter.

First, we would like to place various developments related to glyphosate the way we could piece them together. There will of course be gaps in our information since the Government of India and its pesticide regulators work in a highly secretive manner even though this is a grave matter of public interest.

It was three years ago that ASHA started a petition campaign addressed to the Minister for Agriculture and Farmers' Welfare in Government of India for a ban on glyphosate. In 2019, Swadeshi Jagaran Manch initiated one more online petition campaign this time addressed to the Prime Minister of India seeking a ban on this deadly chemical. Nearly two lakh people have already signed this petition asking for a ban.

In September 2018, Andhra Pradesh government was the first state government to issue orders restricting the usage of glyphosate by regulating the sales in non-crop growth seasons. This was followed by orders of restriction of sales in Punjab, Kerala, Maharashtra and Telangana. In June 2019, West Bengal restricted the usage of glyphosate to only 6 tea-growing districts in the state and that glyphosate will not be used in any state government farms and schemes. Odisha government also put out orders about educating farmers about negative impacts of glyphosate. It also appears that Kerala government, apart from taking action at its own level, has also written to the Centre requesting for a ban on glyphosate and its formulations. This was referred to in the 404th and 407th meetings of Registration Committee wherein it is recorded that DAC&FW has to constitute an expert committee to review glyphosate for banning. It is not clear if such a Review Committee was set up - however, all the above goes to show that state governments are clearly concerned about the adverse impacts of glyphosate.

The current draft order of July 2020 begins by making a reference to the Central Government having received a report from the Government of Kerala for prohibiting the distribution, sale and use of Glyphosate and its derivatives. From available information, Kerala government despite being a tea-producing state (the one crop

in which glyphosate is approved for use in India) has asked for the deadly chemical's prohibition and not the kind of ineffective use restriction order that the Government of India is contemplating.

There was an earlier attempt by the Registration Committee to define the label claim around "non-cropped" areas - in the 407th meeting of the RC on 14th August 2019, the RC meeting minutes mention that the RC approved in its 404th meeting the ICAR Committee report of June 2019 on 'non cropped area uses of glyphosate'. The ICAR Committee itself came up with an unscientific description for what constitutes "non-cropped areas" - for instance, it says that non-cropped area is where any land/area where any crop or vegetation is not being intentionally grown for certain period, and further states that non-cropped area can include "other unintentionally cultivated lands"! - what can be unintentional about any cultivation has not been addressed, of course. It also talks about courtyards and backyards of houses, banks of irrigation canals/channels with no chances of contaminating water, areas around non-commercial fruit trees etc. with a complete disregard for the known toxic qualities of glyphosate.

And now, the current draft order of July 2020 from MoAFW talks about restricting the 'usage' of glyphosate only through pest control operators. Pest Control Operators are licensed through provisions under the Insecticides Act 1968 and are mostly in urban areas of India. On the face of it, it appears as though this will indeed restrict the usage and bring down the rampant and illegal misuse of glyphosate quite beyond its registered uses. And may be the MoAFW thinks that this is adequate to address the legitimate scientific concerns around the numerous adverse impacts of Glyphosate.

However, the hitch with this order is that the government has not restricted sale of glyphosate and has sought to regulate 'usage' of glyphosate. Usage, which happens after the pesticide is purchased at the retailer end is not regulated and not in control of the government in terms of its capabilities to regulate. In the absence of end-use regulation, it is unlikely that the government will be able to check whether usage after purchase by farmers is happening through PCOs or not, that too in the case of lakhs of farmers who are currently using glyphosate indiscriminately, without full information on the chemical. Further, Sec. 38 (1) (a) of the Insecticides Act 1968 clearly exempts farmers from the purview of regulation by stating the following:

38. Exemption: (1) Nothing in this Act shall apply to (a) the use of any insecticide by any person for his own household purposes or for garden or in respect of any land under his cultivation.

Given the above, an order under the Act cannot be contrary to the parent law provision.

Meanwhile, there is enough evidence on the negative impacts of Glyphosate that warrants a full ban on the toxic chemical and it is not clear why the Government of India is dithering on the same.

Glyphosate is a broad spectrum non-selective herbicide which works through the disruption of the critical shikimate pathway. Glyphosate's documented health impacts include non-Hodgkin's Lymphoma which is connected to immune system impairment, autism, Acute Mycloid Leaukemia, shortened gestational periods in pregnancies, endocrine disruption, developmental abnormalities, reproductive health problems etc. Spontaneous abortions are also associated with glyphosate. Cell death of embryonic, placental and umbilical cord cells recorded in studies. It is not just glyphosate but so-called 'inert ingredients' that have been documented to be very harmful making the formulations dangerous too.

Glyphosate mimics an essential amino acid Glycine in any protein thus creating 'rogue proteins' disrupting all normal functions of that protein, leading to a multitude of maladies, including systemic diseases and foetal deformities. Glyphosate also functions as an antibiotic and disruption of shikimate pathway is known to happen in many bacteria too. This then poses the threat of disturbance of human gut micro-biota.

In India too, ITRC Lucknow scientists have published studies on glyphosate in 2009 and 2010. In one study, glyphosate induced carcinogenicity in mouse skin, and in another, geno-toxicity and cytoxicity of glyphosate was found when chromosomal aberrations and micro-nuclei were studied.

In 2015, glyphosate was classified by WHO's IARC as a Probable Human Carcinogen. Bayer (the current entity that bought over Monsanto which was the patent holder on Round Up, a proprietary Glyphosate brand) has to resort to a recent out-of-court settlement of $10.9 billions with many plaintiffs suffering with cancer in the USA after being exposed to glyphosate.

While that is on the health front, glyphosate also causes numerous environmental adverse impacts. It is documented to directly impact a variety of non-target and beneficial organisms. It is known to cause harmful impacts on earthworms and is linked to honeybee decline. It kills beneficial insects like parasitoid wasps, lacewings and ladybugs. Impact on monarch butterflies has been documented.

It also causes resistance in weeds creating 'superweeds', leading to the use of more and more glyphosate and other deadly herbicides. This has been well documented in the USA, apart from data on significant increase in usage of glyphosate.

MRLs of glyphosate are constantly being revised upwards as its use increases, in turn posing a threat to all citizens.

One of the key fallouts of herbicides like glyphosate is also that farmers will start shifting away from poly-cropping to monocropping, especially when GM herbicide-tolerant seeds are also clandestinely available. Instead of multi-cropped resilient farming, this will increase riskiness in farming, that too in the age of climate change which requires resilient farming as a key adaptation strategy.

Further, what are considered "weeds" by modern science are actually well regulated in agro-ecology, and these are not considered as 'weeds' to be killed in fact. These are plants that are useful in the form of fodder or medicines or even uncultivated greens meant for human nutrition.

Additionally, there is the issue of pesticide drift. In a country with smallholdings and marginal land holdings as the main norm, losses due to herbicide drift will be a big challenge to regulate and control. It is reported that crop losses due to herbicide drift is emerging as the biggest reason for litigation amongst farmers in North America and this is one more source of strife in rural lives.

Importantly, in a country like India, poor rural women who find manual de-weeding in agriculture as an important source of livelihood, rampant use of herbicides like glyphosate leave their own socio-economic impacts too.

So-called restrictions and recommendations do not work on the ground in India, as numerous evidences related to occupational, intentional and accidental poisoning showcase.

Several of the above issues apply to other herbicides too, and not just glyphosate creating a sound case for banning them too. In the case of glyphosate, there is a large body of evidence already available about the adverse impacts of the deadly chemical even as large scale unapproved sales and use exists in India with the regulators clearly incapable of regulating this illegal supply and use.

It is not out of place to point out that scientific evidence exists of glyphosate compromising human immune system and in these tumultuous times of the corona pandemic, where the human ability to withstand infectious diseases is clearly demonstrated as being vulnerable, a decisive ban on a deadly chemical like Glyphosate is the only right thing to do.

Given all the above, we demand that the Government of India ban glyphosate and similar herbicides and not try and circumvent sound science by un-enforceable executive orders like the one issued in the current instance.

Sincerely,



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