## CURRENT PESTICIDE REGISTRATION SYSTEM AND CHALLENGES IN ETHIOPIA



**PRESENTED ON** 

Stakeholders Meeting on Pesticide Risk Reduction Activities in Ethiopia 26 October 2011, Addis Ababa, Ethiopia

APHRD, MOA October 26, 20 11

## A. Background

## Definition of pesticide registration

• Means the process whereby the responsible national government or regional authority approves the sale and use of a pesticide following the evaluation of comprehensive scientific data demonstrating that the product is effective for the intended purposes and does <u>not pose an</u> <u>unacceptable risk</u> to human or animal health or the environment.

## **Objectives of Registration of Pesticides**

To minimize the adverse effects of pesticides to humans ,animals, plants and the environment in general

By registering

- Relatively safe
- Locally effective
- Good quality pesticide

## Legislation

#### Mandate:

- The MoA is mandated to Register and Control Pesticides
  - First by a single article included in the Plant Protection Decree No 56 of 1971 (article 5)
- Later "Pesticide Registration and Control Special Decree No 20/1990 was issued in September 1990 and has been implemented between 1996 and 24<sup>th</sup> August 2010



## A new << <u>Pesticide Registration and</u> <u>Control Proclamation</u>>>

• P. No. 674/2010 enacted August 2010.

## **Regulations and Directives**

- A draft Regulation prepared
- No directives
- Guidelines- Compiled

# B. Present organization on the Registration of Pesticide

Who is Involved?

- <u>APHRD of the MOA</u>
- Advisory Board (policy, rules etc) which includes
- Officer designated by the Minister (Chairperson)
- ✓ Officer in charge of pesticide Registration (Member and Secretary)

#### Con...

- ✓ <u>Representatives from</u>
   MOH, EPA, ECAE, EIAR, MLSA, ARC,
- The board (Can set up a technique committee)
- Inspector (with duties and responsibilities)

And have

- Data base and Archive
- Pesticide Register (List of registered Pesti)



## C. Procedure for Pesticide Registration

#### 1. Data Requirement

- Based on SEARCH format and country specific requirements
- Has four parts
  - > Application
  - Active Ingredient Dossier Index (List I)
  - Formulated Product Dossier index (List II)
  - Country specific requirements

SEARCH (Southern and Eastern African countries Regulatory Committee on Harmonisation of Pesticide Registration )



- Applicant identification Name of Registrant and local agent
- Status formulator/importer
- Address
- Product trade name, function, intended use target pest, formulation, registration in SEARCH countries, active ingredients, composition, summary of toxicology on formulated products, packaging, Declaration

## **ACTIVE INGREDIENT DOSSIER INDEX (LIST I)**

## **CONSISTS SEVEN PARTS**

#### **1.DESIGNATION**

Common name, manufacturer or develoment code, chemical name, structural formula, empirical formula

#### **2.Chemical and physical properties**

Physical state, color, odour, density, solublity in water ,solubility in organic solvents vapour pressure, n-octanal/water partition cofficient, method of analysis, photolysis

## Cont...

#### 3. Toxicology

ADI, acute oral, dermal  $LD_{50}$ , Inhalation  $LC_{50}$ Skin irritation, Eye Irritation, sensitization, neurotoxicity, teratogenicity, mutagenicity

#### 4. Ecotoxicology

LD<sub>50</sub>,NOEL, Reproduction 2 species of birds,2 species of fish, daphina, alge, bees,earth worms

#### Conti..

#### 5. Behavior in environment

Behavior, ways of degradation, degradation products in soil,water,  $DT_{50}$ 

- 6. Mode of action
- 7. Residue in the plant

Major metabolites

MRL codex on the crop to be registered

MRL country on the crop to be registered

Method of residue analysis

## FORMULATED PRODUCT DOSSIER INDEX (LIST II)

#### Consists five parts

1. Physical and chemical properties

Physical state/formulation type, color, odor Storage stability, shelf life, density, flammability Flash point, compatibility with other products, PH, oxidizing properties, corrosiveness, water content, wetability, solubility in water, foaming, particle size, Suspensiblity, emulsion stability, volatility, Method of formulation analysis

#### Conti..

- 2. Toxicology
- Acute oral LD<sub>50</sub>, Acute dermal LD<sub>50</sub> on rats
- Skin irritation and eye irritation on rabits
- Sensitization in guinea pig
- WHO classification
- 3. Emergency procedures in case of accidental procedures or poisoning
- 4. Emergency procedure in case of fire /spillage5. Uses

#### **Country specific requirements**

- Local efficacy data generated from research institutions or universities
- Sample of the technical grade and the formulated product- 2 lots of 500 gm or ml of the formulated product and one lot 1 gm of the technical grade
- Agency agreement (between local agent and the registration holder)

#### Cont..

- Third party batch certificate of analysis from accredited laboratory (if the analysis is done by the registrant itself, the registrant should be GLP certified)
- Manufacturing license from the country of origin
- Label in English and Amharic according to Ethiopian pesticide registration guideline
  - One panel label for 5 Kg Liters packages or less and leaflets for the same
  - Three panel label for greater than 5 liter (Kg)

## **D.** Authorization of Registration

- Submission of Application + Dossier Two copies of the dossier (List I and List II)
- Local efficacy report (EIAR or other Institutions with research mandate
  - a. Administrative check
  - b. Technical evaluation (APHRD)
    - (Experts from different discipline within the department will give recommendations) Incomplete back to Applicant



## **C.** The Director /Process owner

## The final decision made by the Director.

# d. Notification of decision to the applicant (Registration/Rejection)



## **E. Registered Pesticides**

Registered pesticides by use category (until Jan 2011)

- Insecticides = 114 (42.8%)
- Herbicide = 61 (23.00%)
- Fungicides = 63 (23.70%)
- Others = 28 (10.50%)
  - Total = 266

#### F. Validity of Registration

The registration of a pesticide shall be valid for <u>five years</u> from the date of issuance of certificate of registration.

## **G.** Renewal of Registration

- Procedure
  - Application made by applicant with the report of import for the last 5 years <u>before 90</u> days of expiration (import volume, area of distribution, information on the effectiveness of the pesticide etc)
  - Assessment made by inspectors if any problem in regard to the specific problem has been reported
  - Payment
  - Renew Certificate

## **H.** Amendments of Registration

- Where <u>changes</u> are proposed to the <u>label or</u> <u>packaging</u> of a registered pesticide, notification of such change shall be made in writing to the Ministry with a copy of the proposed label and where required a photograph of the proposed container.
- Issue new certificate if found legally accepted

## I. <u>Re-registration</u>

- If the original applicant of a registered pesticide wishes to change the trade name, formulation, active ingredient concentration or use of the pesticide
- or another person intends to import, formulate, manufacture, pack, repack, distribute, sell or label that pesticide, an application for re-registration shall be submitted to the Ministry

#### J. Temporary registration

- Where it is ascertained that the pesticide is new manufactured or it is necessary for protecting pests in relation to health sector
- And if the applicant agrees to fulfill Missing information within that time (1 year)
- To be sold or distributed <u>only for the emergency</u> <u>control of pest outbreaks</u>
- Extension can be given for not more than 1 year

## K. Suspension and cancellation

#### Why?

- the registration was secured in violation of law
- withdrawn from the market (notified by manufacturer)
- no longer effective for its intended use;
- Conditions violated
- new facts or an unforeseen change in circumstances which require cancellation

#### contii

- <u>the registrant shall be given 60 days to submit a</u> written justification as to why the registration should not be cancelled.
- decision by the Ministry within <u>30 days</u> of receipt of written justification
- the registration shall be suspended if one of it pending
- Registrant <u>return the certificate of registration if</u> cancelled

## L. Re-evaluation of registration

- If <u>there has been a change</u> in the information required to evaluate the pesticide or
- If the procedures needed to properly evaluate the human, animal or plant health hazards, environmental hazards, efficacy or quality of the pesticide or of pesticides of the same class or kind;
- in light of recommendations arising from international fora or international organizations

## **M. Registry**

- <u>a list and information on all registered</u>
- separate central database or archive

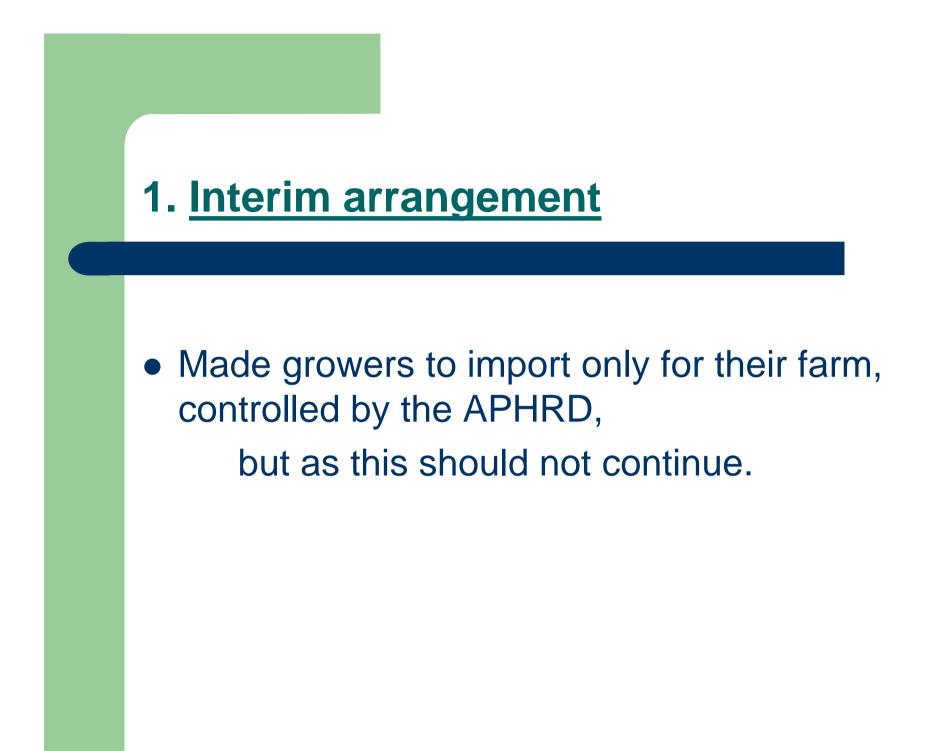
## N. Fees (Issued by Counsel of Ministers)

<ul> <li>Registration of one product</li> </ul>	1000.00 birr
<ul> <li>Renewal of registration</li> </ul>	500.00 birr
<ul> <li>Importation of pesticide for research</li> </ul>	100.00 birr
<ul> <li>Importation of pesticides for trade</li> </ul>	300.00 birr
<ul> <li>To be involved in the business of pes</li> </ul>	t 100.00 birr
<ul> <li>List of Registered pesticides</li> </ul>	5 birr/page



## O. <u>Arrangements for Registration For Pesticides</u> <u>used in Flower Farms</u>

- The flower industry has grown very fast since it started (now more than 83 exporting and more than 1200 ha green house + open field)
- Very limited list of pesticides (not satisfying the industry)
- The Government made <u>two</u> arrangements to help the industry



## 2. Transitional arrangement

- Secondary data for already imported and are being used on flower farms PRC/EIAR collected
- AND those pesticides considered effective were checked for their registration in the
  - MPS Code list 2006/Kenya, Tanzania and Uganda
  - MPS Code list 2006 Holland
  - MPS code list 2005 ETHIOPIA and
  - Kenya Pesticides Registration Booklet 2006

Based on this

- 168 approved for registration based on secondary data collected from flower farms / instead of local efficacy trial
- Other requirements are the same with normal procedure.
- More than 87 dossiers are submitted by applicants and are in the process of evaluation 50% are registered. (still transitional)



## **P. Challenges in Registration**

- Delay of the efficacy trial
- Low Capacity to conduct efficacy trial for flower farms
- Submission of incomplete document by registrants (time)
- Inadequate pesticide laboratory analysis capacity
- Limited staff at APHRD to evaluate dossier

## Q. Activities On-going by APHRD in connection to strengthening the pesticide registration system.

## PRRP-Ethiopia

- In place since February 2010 with activities to strengthen the capacity of pesticide registration in Ethiopia
- Upgrading the quality control laboratory by the TCP



# Thank You! GOD BLESS ETHIOPIA