



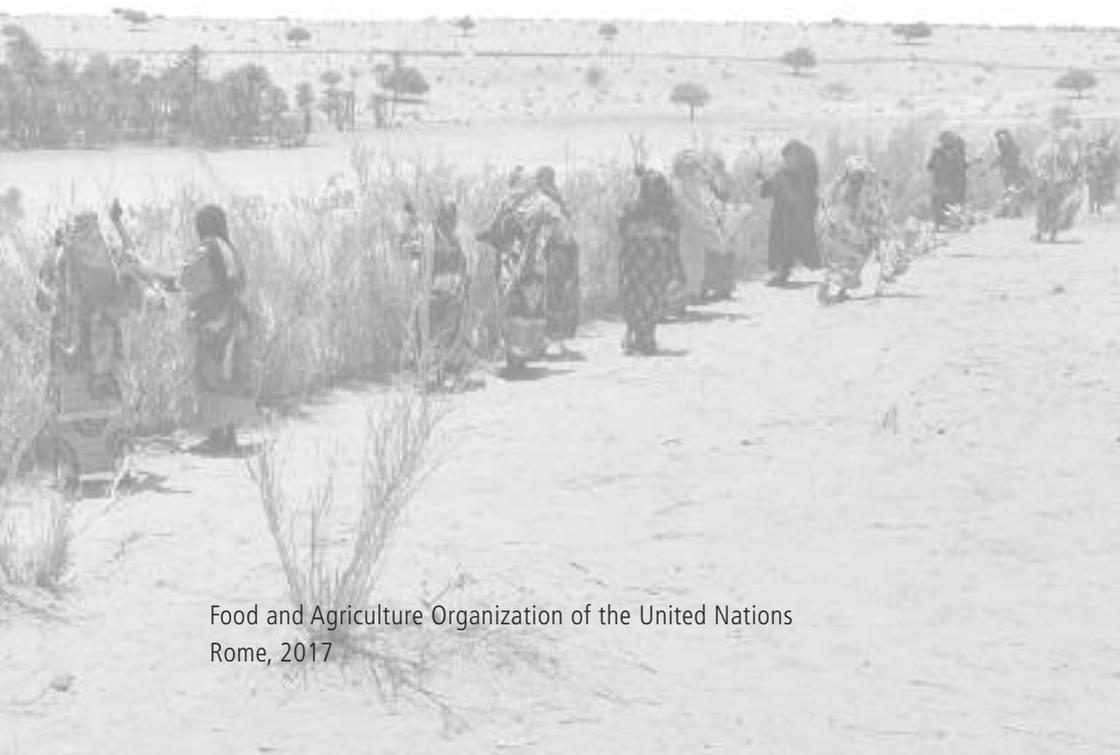
Food and Agriculture
Organization of the
United Nations

IMPLEMENTING THE
ROTTERDAM CONVENTION
THROUGH REGIONAL COLLABORATION
IN WEST AFRICA
THE EXAMPLE OF THE PERMANENT
INTERSTATES COMMITTEE FOR DROUGHT
CONTROL IN THE SAHEL (CILSS)





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ACKNOWLEDGEMENTS

This brochure is based on the many years of collaboration of the Rotterdam Convention Secretariat with the Sahelian Pesticides Committee (CSP) and the Designated National Authorities (DNAs) of the countries belonging to the Comité permanent Inter-Etats de Lutte contre la Sécheresse dans le Sahel, known as the CILSS countries.

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IMPLEMENTING THE ROTTERDAM CONVENTION THROUGH REGIONAL COLLABORATION IN WEST AFRICA

THE EXAMPLE OF THE PERMANENT INTERSTATES COMMITTEE FOR DROUGHT CONTROL IN THE SAHEL (CILSS)

In the past dozen years the CILSS countries of the African Sahel have collaborated to implement the Rotterdam Convention, accomplishing together much more than they could have done individually.

The regional approach has optimized their resources, improved pesticide registration, promoted communication and teamwork, and increased their control over pesticide imports.

This is the story of how the countries have collaborated, how the obligations of the Rotterdam Convention and the Secretariat's assistance have helped them to succeed, and what has been learned from the experience.

This is the first case of regional implementation of the Rotterdam Convention. Its success is offered as an example to other regions of the benefits of collaboration in managing and reducing pesticide risks.

CONTENTS

ACKNOWLEDGEMENTS	3
THE ROTTERDAM CONVENTION	6
THE REGIONAL ORGANIZATION CILSS	7
THE PARTNERS IN THE COLLABORATION	9
The Designated National Authorities	9
The Rotterdam Convention Secretariat	10
THE PROCESS	11
THE RESULTS	13
Ratification of the Convention	13
Notification of final regulatory actions	14
Import decisions	15
Proposals for severely hazardous pesticide formulations	16
Information exchange and awareness building	17
Representation in the Chemical Review Committee	17
LESSONS LEARNED	18



THE ROTTERDAM CONVENTION

The Rotterdam Convention is about the exchange of information on certain hazardous chemicals and pesticides in international trade. Its main function is to give countries an early warning on pesticides and industrial chemicals that have been banned or severely restricted in other countries for health or environmental reasons.

The Convention establishes a list named Annex III of such chemicals, making them subject to the prior informed consent (“PIC”) procedure. Countries that have ratified the Convention are required to take a decision on the future import of these chemicals. In addition, exporters of chemicals not listed by the Convention but banned or restricted in the exporters’ territory for health or environmental reasons need to inform importing countries accordingly.

The Rotterdam Convention does not ban or restrict any chemicals, nor does it require countries to automatically prohibit their import. Its purpose is simply to ensure that hazardous chemicals are not exported to countries that do not wish to receive them.

The Convention also promotes the sharing of responsibility for the management of chemicals. It calls on exporters to provide proper labeling and directions on safe handling, and on exporting nations to make sure that producers within their jurisdiction comply.

The Rotterdam Convention entered into force in February 2004. As of mid-2017, it was ratified by 159 countries. The countries, or “Parties” to the Convention, meet every two years to oversee the implementation of the Convention and to decide, among other things, whether to add new chemicals to the list.

As of mid-2017, the PIC list had 50 chemicals, including 35 pesticides and 16 industrial chemicals (one chemical being listed in both categories).

THE REGIONAL ORGANIZATION CILSS

The regional organization that brought the countries together is the Permanent Interstates Committee for Drought Control in the Sahel, known as “CILSS”, the acronym for its French name, Comité permanent Inter-Etats

de Lutte contre la Sécheresse dans le Sahel.

Established in 1973, CILSS comprises 13 countries in West Africa as shown in Figure 1.

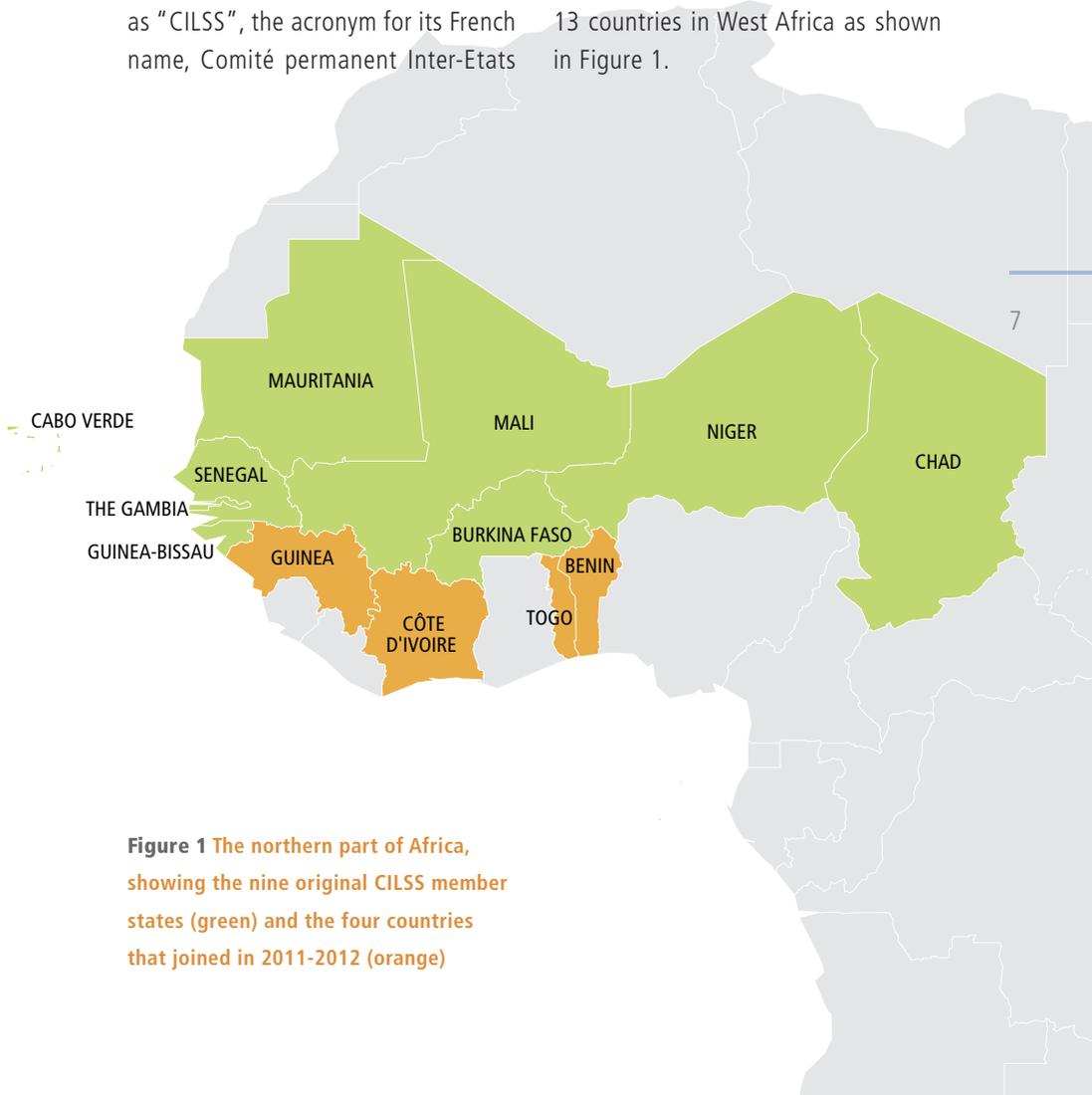


Figure 1 The northern part of Africa, showing the nine original CILSS member states (green) and the four countries that joined in 2011-2012 (orange)

CILSS not only addresses desertification in the region but also has a mandate to improve food security. Under this mandate CILSS created the Sahelian Pesticide Committee, known as the "CSP", following the region's adoption, in 1992, of a *Common Regulation for the Registration of Pesticides in CILSS Member States*. The objective of the regulation was to combine the expertise in pesticide evaluation and management of the CILSS member states in order to improve pesticide registration.

The CSP is made up of experts from all CILSS member states and serves as

their common registration body. It assesses registration dossiers submitted by the pesticide industry and authorizes the distribution and use of pesticides for all the CILSS member states. The CSP has the authority to issue full or provisional registrations or registrations with restrictions, but also to refuse the registration of a specific pesticide product or of all future uses of a pesticide, which is equivalent to issuing a regional ban.

This approach has fully replaced national pesticide registration in individual CILSS member states and also facilitated their implementation of the Rotterdam Convention.



THE PARTNERS IN THE COLLABORATION

The collaboration between the CILSS member countries and the Rotterdam Convention Secretariat began in 2005 and took shape over several years to respond to the countries' needs. The partners included the CSP, as the regional pesticide registration body; the countries' "designated national authorities" for implementing the Rotterdam Convention; and the Secretariat of the Convention.

The Designated National Authorities

As Parties to the Rotterdam Convention, all 13 CILSS member states have designated national authorities (DNAs) who are responsible for:

- notifying the Convention Secretariat of final regulatory actions such as banning or restricting use of a pesticide,
- submitting proposals for severely hazardous pesticide formulations,
- providing import responses, i.e. consent or refusal of a proposed import, to chemicals subject to the PIC procedure,
- communicating import responses to stakeholders in the country,
- sending and acknowledging export notifications, and
- sharing information with the Convention Secretariat and with prospective exporters and importers.

These functions require the DNAs and the CSP to work together closely. For example:

- Pesticide distribution and use are authorized regionally by the CSP, but import decisions are taken nationally by the DNAs.
- The CSP can ban or severely restrict a pesticide for all CILSS member states, but it is the DNAs who must notify the Convention Secretariat.
- Monitoring of health or environmental incidents is done by the states, but most of the capacity for pesticide risk evaluation has been developed under the CSP.

The Rotterdam Convention Secretariat

The Secretariat of the Rotterdam Convention made the CILSS collaboration happen. It identified the region's potential to benefit from

collaboration. It brought the CSP and the DNAs together to activate and enhance their partnership. And it provided and continues to provide essential technical and administrative support to maintain this successful collaboration.



THE PROCESS

In 2005, approximately a year after the Rotterdam Convention entered into force, the Secretariat held a first meeting in the region aimed at setting up a programme to help the CILSS member states use the CSP's work to implement the Convention.

This first meeting evaluated the countries' progress in implementing the Convention and identified the main gaps and constraints. It also set the stage for the framework of collaboration between the CSP and the DNAs.



This framework was fine-tuned during the second collaborative meeting, in 2006, and remained virtually unchanged afterwards. The framework defined the responsibilities of the CSP and the DNAs for managing pesticides and implementing the Convention, and it set out modalities for information exchange.

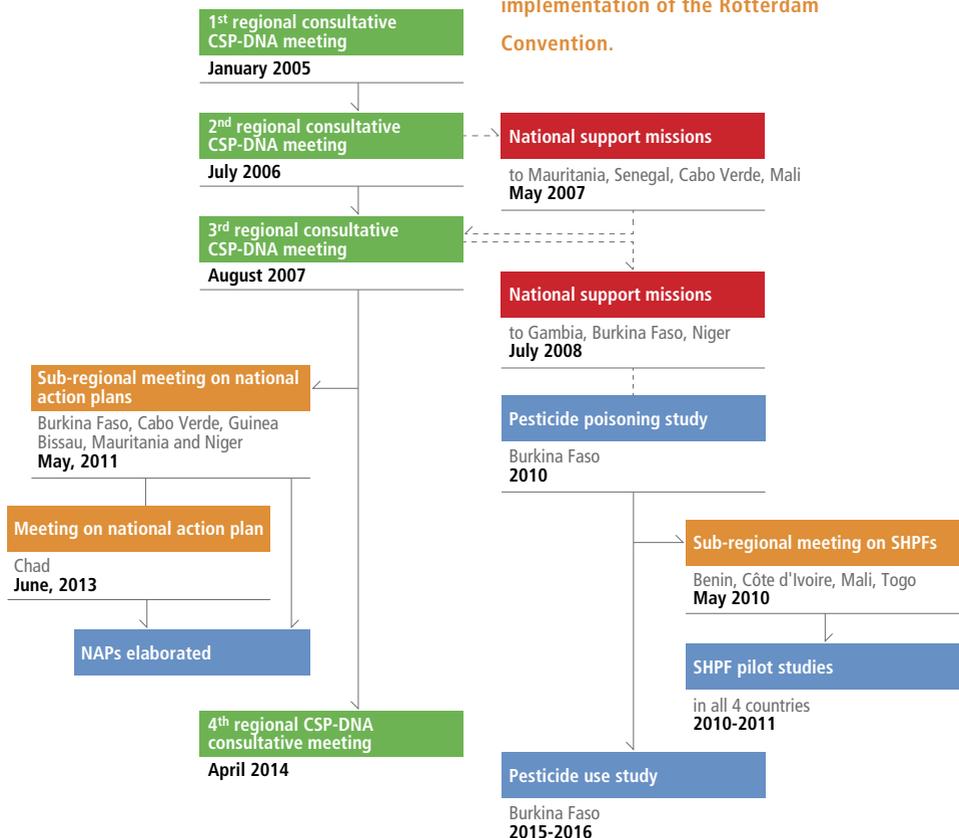
A third meeting was organized in 2007 and a fourth in 2014 to review progress with the collaboration. The meetings also discussed a number of pesticides that had been, or were likely to be, banned or severely restricted by the CSP.



Following the second and third meetings most of the countries received a technical support mission composed of a CSP member and an international consultant, to review their progress in implementing the Convention and to identify constraints and solutions. Technical assistance was continuously provided by the Rotterdam Convention

in developing and implementing national action plans. Studies were also carried out in certain countries on pesticide use and poisoning or on identification of severely hazardous pesticide formulations (SHPF). The results of the studies contributed to the CSP's decisions on certain hazardous pesticides.

Figure 2 Outline of the collaborative programme between the CSP and the DNAs of the CILSS member states on implementation of the Rotterdam Convention.



THE RESULTS

In the 12 years since its inception, the CILSS collaboration has enabled the member states to make substantial progress in implementing the Rotterdam Convention.

Ratification of the Convention

At the time of the first meeting of the partners in the collaboration, five of the nine original CILSS member countries, as well as four countries that would later join CILSS, had ratified the Convention.

In 2012, all of the then 13 CILSS member countries were Party to the Convention.

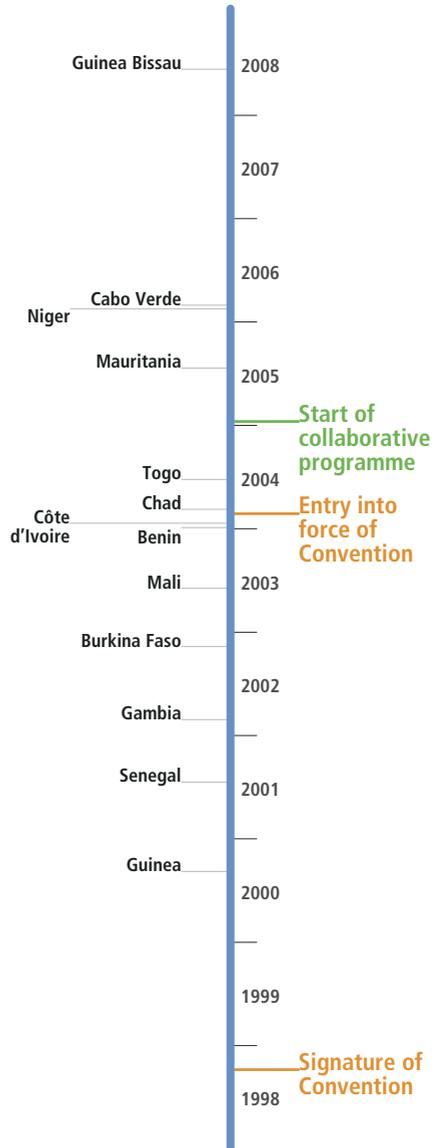


Figure 3 Timeline of ratifications of the Rotterdam Convention in the CILSS member states and the start of their collaborative programme.

Notification of final regulatory actions

In early 2005, the CSP had not yet banned or severely restricted a pesticide, although four of the nine original CILSS member states had banned one or more pesticides at the national level. Only one country had notified these bans to the Convention.

By mid-2017, 12 of the 13 CILSS member states had submitted a total of 121 notifications of regulatory action to ban or severely restrict a pesticide. The steady rise in the number of notifications, shown in Figure 4, is undoubtedly due to the successful coordination between the CSP and the DNAs and their agreement on a clear procedure.

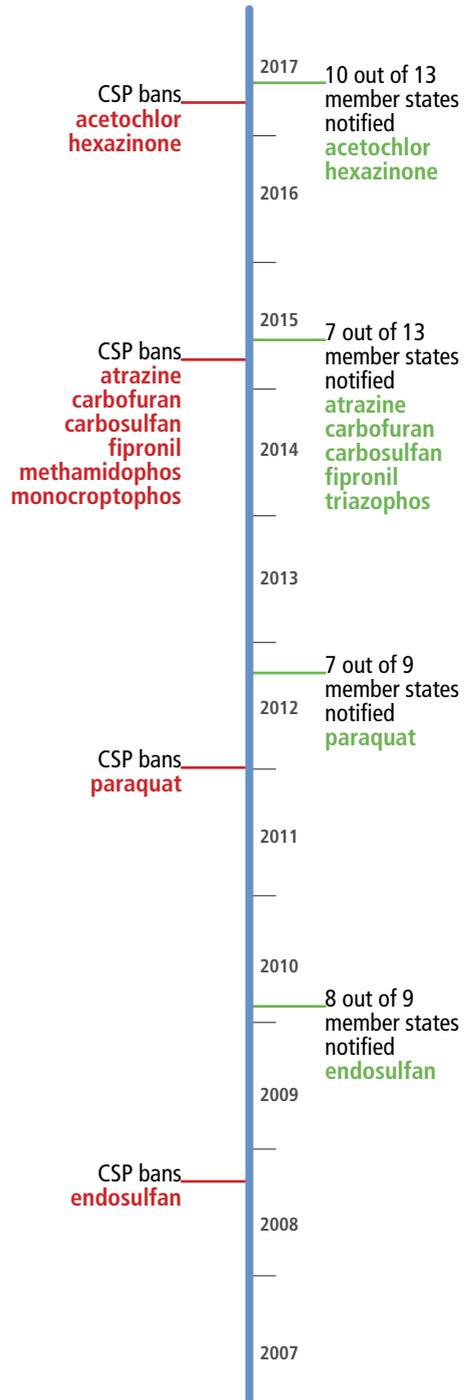


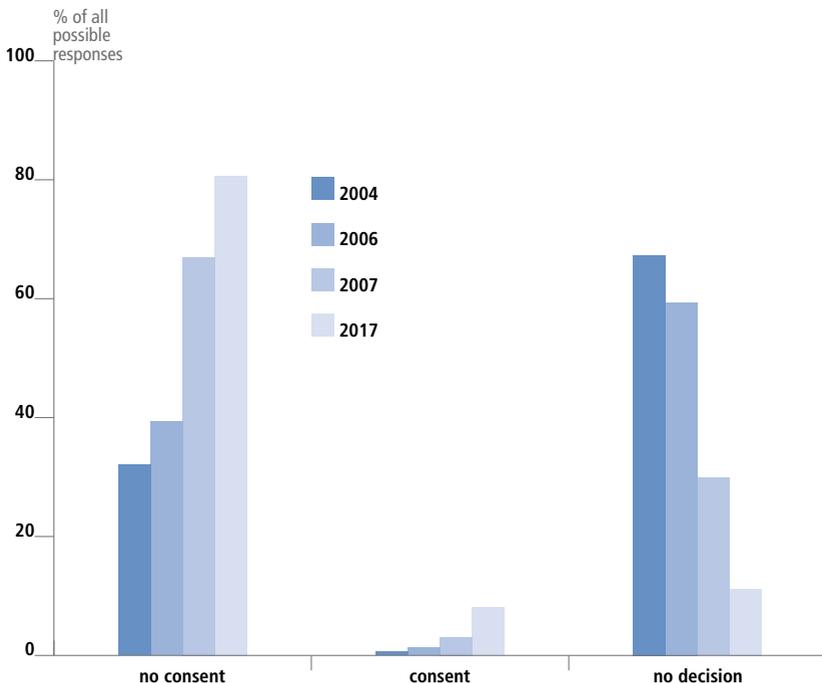
Figure 4 Notifications of banned or severely restricted pesticides in CILSS

Import decisions

In early 2005, five of the six CILSS member states that were then Party to the Convention had submitted import responses for some or all of the listed PIC pesticides. By mid-2007, this had increased to seven countries out of eight that were Party to the Convention. By mid-2017, most of the 13 CILSS member states had submitted most of the required import responses. The number of refusals to import also increased substantially between 2005 and 2017, while failures to decide decreased.

The improvement is no doubt due to the more intensive and structured contact between the CSP and the DNAs as a result of the collaboration. For example, the CSP regularly sends the DNAs lists of pesticides that are registered in the region.

Figure 5 Trends in pesticide import responses from CILSS member states



Proposals for severely hazardous pesticide formulations

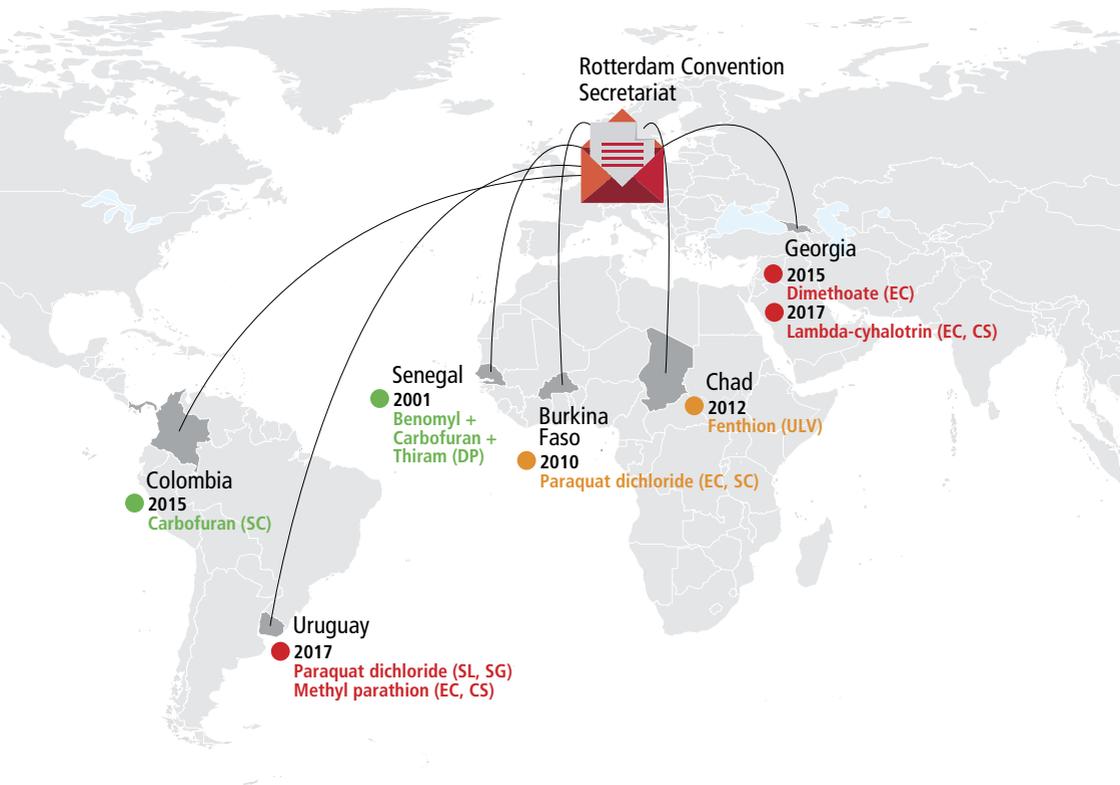
As of mid-2017 three CILSS countries had submitted proposals for listing of severely hazardous pesticide formulations (SHPFs) to the Convention after pesticide poisoning incidents. The status of these proposals and of those made by other countries is shown in the Figure 6.

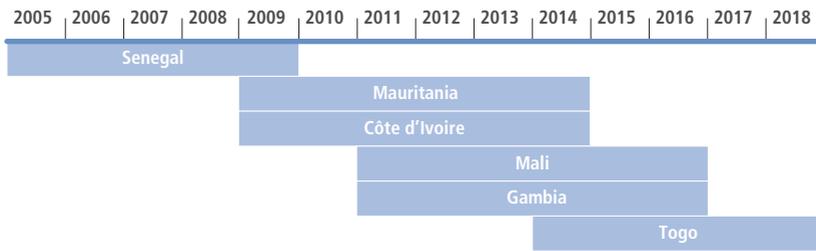
The CILSS countries' active participation in this part of the Convention suggests that their regional experience has made them keen to share information on pesticides with other countries as well, as a means to collective action.

Figure 6 Proposals made for SHPFs since the entry into force of the Convention.

Green = successful; red = unsuccessful; orange = pending. The proposal made by Senegal was listed in Annex III in 2004. The proposals made by Burkina Faso and Chad have been recommended for listing and are under discussion.

- CS _ Capsule Suspension
- DP _ Dustable Powder
- EC _ Emulsifiable Concentrate
- SC _ Soluble Concentrate
- SG _ Soluble Granules
- SL _ Soluble Liquid
- ULV _ Ultra Low Volume





Information exchange and awareness building

Information exchange and awareness building among all stakeholders, both a crucial part of the Rotterdam Convention, are still not as strong in the CILSS region as they could be. But the partners are aware of this and, with the Convention Secretariat's support, are working to improve. One important accomplishment was having the annual "Day of CILSS" in 2008 dedicated to "Harmonizing chemicals management in the Sahel". The partners look forward to more successes in the future, and the Rotterdam Convention Secretariat is committed to supporting related activities.

Figure 7 Participation in the Chemical Review Committee by experts from CILSS member states

Representation in the Chemical Review Committee

Since the start of the collaboration, the CILSS countries have always had an expert in the Convention's Chemical Review Committee (CRC), which reviews and recommends chemicals for listing. The CRC members serve as independent experts, not as country representatives, but the continuous participation by CILSS demonstrates the region's interest and capacity in sharing information and expertise on pesticides.

LESSONS LEARNED

The lessons that follow from the CILSS collaboration illustrate both the benefits and the limitations of a regional approach to implementing the Rotterdam Convention.



BEST USE OF LIMITED RESOURCES

Regional collaboration can be an excellent way for countries to make the most of limited financial and human resources, particularly if a regional organization that deals with chemicals or pesticides already exists. The Rotterdam Convention Secretariat can provide technical and logistical support to bring the partners together and establish the approach.



TAILOR-MADE APPROACH

Any regional approach should be tailored to the existing legal and administrative situation. Ideally, the regional body and the DNAs should have complementary tasks and responsibilities, so that collaboration has mutual benefits. Where the regional body has an advisory function, it can facilitate implementation of the Convention by providing technical expertise and a platform for information exchange.



NATIONAL AND COLLABORATIVE TASKS

Not all provisions of the Rotterdam Convention are equally amenable to regional collaboration. Monitoring of human health and environmental incidents, export notifications, and information exchange with stakeholders are mainly national activities. On the other hand, tasks that depend on pesticide hazard and risk assessment, including notifications of final regulatory actions, import decisions, and proposals of severely hazardous pesticide formulations, can benefit considerably from regional collaboration.



STRENGTHENED PESTICIDE MANAGEMENT

Implementing the Rotterdam Convention regionally or nationally, with the Secretariat's assistance if needed, can strengthen pesticide management considerably.

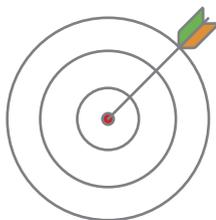
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ROTTERDAM CONVENTION

INCREASING CAPACITY

Technical and financial support from the Rotterdam Convention can facilitate the start-up of regional collaboration. The regional system must then become self-operating over time although further ad hoc support from the Convention can be provided for specific activities.



PERSEVERANCE

Setting up a regional programme and getting results may take a long time. But investing this time is worthwhile.



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For more information

For more information and the full report
see the web site of the Rotterdam Convention
<http://www.pic.int>

For queries please contact:
pic@fao.org

