

Insight experience on industry involvement and public-private partnership on chemicals management

The case of Madagascar

Author:
Rivo ANDRIAMANALINA
President of CropLife Madagascar
Representative of Group of chemical fertilizer importers
Manager of FIAVAMA, Bayer agent
MADAGASCAR

INTRODUCTION

As President of CropLife Madagascar, the association which represents the agrochemical industry in the country, I am involved in various organisations which deal with chemicals management. I also have been appointed as representing the newly Group of chemical fertilizers importer in Madagascar.

As representative of private industries in the local SAICM implementation committee, I have been asked by the local correspondent to share my experiences and views on existing industry involvement and on existing public-private partnership on chemical management.

I would like to mention here, that our organisation gathers importers and distributors of agrochemicals and industry chemicals, and formulators of agrochemicals. Therefore, we are involved with the complete lifecycle of chemicals from import and manufacture on some cases of chemicals to the end users to whom we support and give stewardship.

It will be stated on this paper how voluntary initiatives on chemicals management is important in developing countries where means of law implementation vary from one sector to another.

1. Chemical fertilizers experience

Chemical fertilizers has been on the cutting edge of the government, international organisation and NGO's initiative in Madagascar as it has been commonly agreed that development of agriculture has to go through the increase of fertilizer uses to enhance production and ameliorate standard of living in rural communities.

It has been omitted to say that what we talked about is not only fertilizers but chemical fertilizers. As there is lack of rules bending the fertilizer industry in Madagascar, the industry has to endorse responsibility on how to manage this sector to ensure fertilizers are used in appropriate way and a certain standard of products are allowed to enter into the country. This is why FAO and USAID representatives have pushed us to create an organisation for fertilizer importers and distributors in order to better address the issues surrounding the fertilizer industry. A platform gathering all stakeholders, including Ministry of Agriculture, Ministry of Commerce, International Organisation such as the Japanese Aid Organisation, USAID, FAO, European Union has been created in order to monitor the future of the fertilizer sector. This is a concrete

example of public-private partnership based on initiative from International Organisations, and on a participative approach.

The Group of fertilizer operators has addressed various issues surrounding professionalization of the sector. Main issues discussed are based mainly on voluntary initiatives:

- some criteria will be set in order to identify professionals in the sector to form the group of fertilizer operators which will be able to deal with other peers
- product control has to be done to make sure the nutrient content stated in import documents complies with standard variance accepted. Laboratory exists to make the product analysis but it is our interest to involve the Ministry of Agriculture to force importers to give samples for analysis and pay analysis cost
- Proper packaging and labelling are to be adopted. Name of importer and manufacturer have to be mentioned on the bags to facilitate tracing.
- Industry has a responsibility to ensure that storage and application of chemical fertilizer are promoted by its distributors, meaning training has to be given to distributors and training cost will be supported by each importer

The chemical fertilizer case serve as an example of industry involvement when regulations are non existent. The Platform has been set by International Organisation initiative to increase the use of chemical fertilizer, but industry has taken opportunity to address chemical management of the sector.

2. Chemical pesticide experience

Pesticide sector in Madagascar is bind by regulatory authorities and is indeed the chemical type that is most supported by International convention and national laws. Therefore, the case is very different from chemical fertilizers where regulatory authorities does not exist and where national laws are non existent. On different case, the industry has adopted different approach.

Seven years ago, Phytomad was created. This was the first time importers and distributors of pesticides have gone together to create an association to address issues surrounding pesticide management. The name of the association has now changed to CropLife Madagascar as an affiliate of CropLife International regrouping the multinational plant science industry.

In Madagascar, only registered products are allowed to enter the country, and the product that has been registered should be exactly equivalent to the product that is imported afterwards. However, it is widely known that some commercial farmers import directly some pesticides without any control and with no registration. In addition, some pesticides importers do import active ingredient from many countries where the active ingredient registered comes from an identified manufacturer. Packaging, repackaging, labelling, handling, use and control of pesticides does not comply with any standard. To summarize actual situation of pesticide management in Madagascar, watchdog exists but law implementation and law enforcement are difficult to put in place. The reasons are mainly: lack of promotion of pesticide management, lack of finance and turning a blind eye on the situation from regulatory authorities, high competition in the sector forcing some importers to import low standard products at a very low price.

Facing the situation, the industry has decided to enlarge the role of the association to put in place a voluntary approach on pesticide management. An Ethical Code and Code of Conduct based on

the Guide for Industry on the implementation of the FAO on the Distribution and Use of Pesticides will be signed shortly by all regular pesticide importers. All association members are given a year from date of signature of the Ethical and Conduct Code to comply with existing regulation regarding registration, packaging and labelling. Systematic complain will be addressed to registration committee when regulation will not be respected. Also, training at different levels is given a high priority and a consultant is paid by the association to give training to stockist in different region and technicians of the large commercial farms. These training are funded by the association in cooperation with BAMEX, the USAID executive agent in Madagascar. It has been agreed that a solution has to be found for disposal of pesticides and used containers. The association will also finance poster campaign in order to promote safe use of pesticide and good agricultural practices.

An interesting example of public-private partnership in pesticide management can be found in the locust control side. Locust control is managed by a specific entity under control of the Ministry of Agriculture. As they operate on public tenders for pesticides purchasing, it has been stated on tender documents that training and stewardship will be given to applicators on the field, disposal of used container is taken in charge by each supplier and environmental impact analysis will be conducted and financed by the supplier.

The case of pesticide management shows that when law enforcement are difficult to put in place, voluntary initiatives has to be adopted by the industry because it is also the industry interest to strengthen chemical and waste management as bad practices will undermine its image. As for the case of public tenders, it is the responsibility of the issuer of the tender to bind the suppliers to comply with its waste and management practices that should normally be based on the FAO recommendations and International Convention (such as Ramsar Convention) adopted by Madagascar.

3. Industry Chemicals experience

In this sector, national chemicals management are none existent. No regulatory infrastructure, no national policy that address the matter. I think that's where SAICM approach is mostly important, and some initiative such as CNGPC (Comite National de Gestion des Produits Chimiques) National Chemical Management Committee that will give indications on how to regulate the sector and prepare effectively on a paper the regulation, are important.

At the moment, there is no analysis required, practically no advice or assistance is given to end users considering that end user can be a corner bakery or butcher shop or a small painting workshop. Packaging, repackaging, safe use program, waste management program are non existent. The role of SAICM should be to address the matter to the government in order to give high priority to the chemical management matter. National regulatory authority has to be established and give means of control. It is highly important that national policy is designed and means are given to the regulatory authority for implementation.

It is also important that a Group of industrials is set to identify the most important corrective action to be taken voluntarily.

CONCLUSION

Our intention is to share experience with other countries on how to strengthen partnership between all stakeholders. Our approach is based mainly on voluntary action to be taken by the industry as law enforcement vary widely from sector to sector.

We would like to learn from different participants on how to overcome the challenges facing the sector on designing adaptive policy, take corrective action, designing and implementing effective chemical management based on voluntary action and partnership approach.

We think it is highly important Madagascar realizes development of agriculture and industry also goes through good management practices if we do not want to barter our development to environment damage and human health consideration. That's why SAICM pilot project is important to Madagascar.