



PRESS STATEMENT

LIFE BEFORE PROFITS! A CALL TO GOVERNMENT OF UGANDA TO REGULATE TRADE AND USE OF HIGHLY HAZARDOUS AGRO-CHEMICALS

25TH SEPTEMBER 2022

We the concerned Civil Society Organizations (CSOs) working to promote the Right to Adequate Food, Right to Health, Trade justice, Agriculture, Environmental Justice, Farmers' Rights and human rights related issues are concerned by Government's continued failure and omission to ban the use of hazardous agro-chemicals such as Glyphosate Based Herbicides (GBHs) which threaten and are in violation of the right to life, health, right to adequate food and to a clean and healthy environment guaranteed under Objectives XX, XXII, Articles 20, 45, 8A and 33 of the Constitution of the Republic of Uganda, 1995.

Agriculture remains the backbone of the Uganda's economy. The agriculture sector is made up of food crops, cash crops, livestock and fisheries subsectors, with the crops subsector being key to agricultural development and industrialization of the country. Agriculture has been and continues to be the most dominant and significant sector in regard to the country's economy. It remains central to economic growth and the enhancement of household and national incomes; thus, it is the springboard for socio-economic transformation. More than 70% of the population derive livelihoods from the agriculture sector.

In the pursuit of agricultural commercialization which is geared towards increasing agricultural production and productivity, the demand for agro-chemicals is increasing given that such a model of agriculture has been and still is chemical/fertilizer-intensive. The Annual Agricultural Survey (AAS) 2018 results indicate that about 21 percent of agricultural households used agro-chemicals.¹

Dominant approaches to agricultural development continue to call for an 'African Green Revolution' and emphasize farmers' increased access to agro-chemicals as key for achieving intensification and commercialization of production.

Uganda and Tanzania have been recognized as hotspots of fake agrochemical production and where counterfeit pesticide levels may be over 40% (Agribusiness Global, 2018, Nampeera et al., 2019).²

As CSOs, we commend Government for:

- Setting up a Committee to investigate the effectiveness of agrochemicals and animal health products in Uganda. The mandate of this Committee is to Study and inquire into the forms of complaints and their probable root causes regarding the quality of agrochemicals, acaricides and inputs and their various sources that are available on the Ugandan market.
- Putting in place various laws and frameworks which include; The Constitution of

¹ <https://www.ubos.org/microdata/index.php/catalog/62>

² <https://www.europarl.europa.eu/cmsdata/219887/Pesticides%20health%20and%20food.pdf>

Uganda 1995, the Agricultural Chemicals (Control Act), 2006, National Environmental Act, 2019(Part VI: Sound Management of Chemicals and Product Control) among others;

We applaud the H.E the President of Uganda for among other things, calling for the immediate amendment of Plant and Animal Health laws and promoting Uganda as a producer/supplier of organic products. However, we are concerned about the inconsistency in Policy and practice. We have not witnessed his proclamations of consuming healthy, nutritious, safe African diets translate into policy and practice to benefit all the people in Uganda, our trade, our economy and our environment.

The Treaty for the Establishment of the East African Community (EAC) to which Uganda is a member under Article 108 on Plant and Animal Disease Control states: *“Partner states shall: a) Harmonize policies, legislation and regulation for enforcement of pest and disease control; b) Harmonize and strengthen regulatory institutions; c) Adopt common mechanism to ensure safety, efficacy and potency of agricultural inputs including chemicals, drugs and vaccines, among others;”*

We recognize that Uganda is party to regional and international agreements and protocols relating to usage and management of pesticides and other agrochemicals. The Protocols include; Stockholm, Montreal, and Rotterdam among others.

CSO Concerns on the use and trade of agrochemicals in Uganda:

Our concerns are based on the increasing use and promotion of agro-chemicals (Pesticides, Herbicides, Commodity chemicals, Fertilizers, among others) that are being used in Uganda and yet some of these agro-chemicals have been banned and/or classified as highly hazardous and “probably carcinogenic (cause cancer and other diseases to end users).

We wish to reiterate that, currently, large quantities of banned chemical pesticides are still in use illegally in Uganda. ³The effect of these pesticides on humans, that is, children, adults, including pregnant women, either through chronic residential or occupational exposure, leads to various negative effects.

We specifically note that based on the European Commission Regulation No 1107/2009, more than half (59%) of the 41 Highly Hazardous Pesticides (HHPs) identified under current official registration for use in Uganda are currently not approved for use across the European Union.⁴

Furthermore, we wish to emphasize that due to the continued use of hazardous agrochemicals, the resulting impacts on human life and the planet are likely to be contrary to the United Nations’ Sustainable Development Goals (SDGs) and threaten our food security. Understanding these far-reaching implications is more urgent today given the repercussions of climate change and the COVID-19 pandemic that are constraining availability and access to food.

Trade-in illegal and counterfeit and hazardous agro-chemical:

We wish to note that due to the unregulated marketing, farmers are lured into buying various agro-chemicals some of which are counterfeit and substandard. Consequently, some farmers have incurred losses as a result of using counterfeit agro-chemicals.

Uganda’s rapid market liberalization has created a situation of widespread promotion of agro-chemicals and pervasive availability of cheap, poor-quality products, including counterfeits.

Additionally, farmers often do not have adequate personal protective equipment (PPE)

³ <https://www.agriculture.go.ug/wp-content/uploads/2022/02/Chemical-Register-Feb-2022.pdf>

⁴ <https://www.agriculture.go.ug/wp-content/uploads/2022/02/Chemical-Register-Feb-2022.pdf>

and are often unable to read labels that are usually the only source of safety instructions. Majority of agro-chemical users in Uganda lack minimal training, thus fall short in having basic knowledge and skills to use these products.

Loss of lucrative markets for Agricultural Products

Uganda has been losing lucrative markets for its agricultural products in a number of markets at national, continental and global levels.

For example, Uganda is estimated to lose approximately \$200m in exports of agricultural products to markets in the European Union (EU) and the United Kingdom due to among others, using agrochemicals that have been banned worldwide including by the EU. As such, Ugandan producers often find it difficult to meet sanitary and phytosanitary standards required to export goods to Europe and the United Kingdom.⁵ The EU has occasionally slapped bans on Uganda's Agricultural exports due to prevalence of harmful pesticide residues. Harmful agrochemicals negatively impact on Uganda's trade competitiveness, food security.

Health related risks and illnesses:

Agro-chemical use is associated with increases in human illness, including increased health expenditures related to illness and time lost from work due to sickness. The recorded diseases associated with the use of some agrochemicals include; obesity, diabetes, Alzheimer's, dementia, Parkinson's, asthma, chronic bronchitis, autism, erectile dysfunction, and psychological disorders as a result of chronic exposure to the banned pesticides.

In several published studies, it was documented that various Non-Communicable Diseases (NCDs) like cancer diseases, obesity, diabetes, and erectile dysfunction, have occurred as a result of exposure to various banned pesticides. Furthermore, studies indicate that high levels of the infamous herbicide have been found in foodstuffs such as almonds, carrots, quinoa, soy products, corn, vegetable and corn oil, canola seeds, beets and sweet potatoes as well as popular breakfast products like oatmeal and cereals.

While agro-chemicals such as pesticides, insecticides, fungicides, and herbicides are often promoted as inputs that increase agricultural productivity by limiting a range of pre-harvest losses, their use is associated with a long-term and severe risks to human health, labor productivity and the environment.

Weak Policy and Regulatory Mechanisms:

The poor monitoring and enforcement of agrochemical regulations coupled with the various gaps in the laws and policies has worked in favour of increasing the sale and promotion of hazardous agrochemicals in Uganda at the expense of the lives and livelihoods of users and farmers.

Recognizing that the registration and proper application of agro-chemicals is provided for in the national, regional and international legislative frameworks and given government's obligation to monitor the efficacy, toxicity and environmental effects of all agrochemicals, the sale and use of agro-chemicals is poorly monitored and controlled.

Whereas MAAIF administers the law through the Agricultural Chemical Control Board to license chemicals, it's difficult to follow up with how chemicals are used by the farmers due to the weak agricultural extension system and enforcement infrastructure.

Agrochemical-Related Environmental Pollution Leading to Loss of Biodiversity:

Pesticides have grossly destroyed biodiversity, an important component for crop growth. Crop farming is not an isolated practice but a play of different systems. The loss of plant /crop pollinators, e.g. bees, beetles, butterflies and birds due to chemicals, has a direct effect on crop -cross pollination and consequently, crop fertilization failure and yielding.

⁵ <https://www.trade.gov/country-commercial-guides/uganda-agricultural-sector>

Agrochemical waste can pollute food, groundwater crops and also cause health related risks. The use of synthetic fertilizer can cause health and water problems. Glyphosate-Based Herbicides do not only pose a risk to human health, they severely impact our food, biodiversity and the environment. As the most widely used weed-killer in the world (it is the active ingredient in Bayer-Monsanto's Roundup), glyphosate is sprayed on fields, but also leeches into the surrounding environment (water bodies, soil, dust, air) at the cost of biodiversity. Aquatic life is exposed, so are insects and humans who eat food that is in contact with poisoned soil. Given the increasing use of agrochemicals, Biodiversity is declining at an alarming rate. Even at levels deemed safe, research confirms that agrochemicals contribute to loss of biodiversity, including reducing populations of beneficial insects, as well as birds and amphibians. Furthermore, the rivers polluted with fertilizers may increase algae production, and this may have an adverse effect on the life cycle with fish and other aquatic animals.

As a country we are running a danger of contaminating Lake Victoria through the permitted growing of rice in its catchment wetlands. It should be noted that in rice growing a lot of Amino phosphonates and other chemicals are commonly used and yet they contaminate and compromises water quality, causing eutrophication, hence compromising the breeding spaces of fishes and aquatic life in general. Furtherance to this is the permission of flower farming in the most fragile ramsar site ecosystems around Lake Victoria. While the president ordered the cancellation of titles in wetlands this directive isn't forthcoming due to political interference.⁶

"Excessive use and misuse of pesticides results in contamination of surrounding soil and water sources, causing loss of biodiversity, destroying beneficial insect populations that act as natural enemies of pests and reducing the nutritional value of food", stated the UN Report of the Special Rapporteur on the right to food already back in 2017.

Limited data on agrochemical

There is lack of information on agro-chemicals usage, handling, management and implications of health and environment. This is partly due to the gaps in national documentation and reporting of agro-chemicals in Uganda.

Limited Sensitization and knowledge on usage and handling of agrochemicals

Majority of the users of agrochemicals lack information on handling and disposal of agrochemicals and handle the same without adequate protective equipment. The cost for protective equipment is also certainly a barrier for resource-poor smallholders.

Lack of alternative pesticides on the market There are limited alternative environmentally -friendly pesticides on the market which deprive farmers of viable alternative options.

We therefore recommend the following proposals in the immediate, medium and long term;

Government and Relevant Ministries, Departments and Agencies including Department of Crop Inspection and Certification at the Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) Agricultural Chemicals (Control Act), 2006 Agricultural Chemicals Control Board (ACCB), National Drug Authority (NDA), National Environment Management Authority of Uganda (NEMA) among others;

- Invest in research and production of organic and safe fertilizers on a commercial scale
- Issue an immediate ban on use of glyphosate, and Glyphosate Based Herbicides (GBH) in Uganda and all internationally banned agro-chemicals. This should be

⁶ <https://necjogha.com/2019/07/26/museveni-orders-for-cancellation-lwera-wetland-titles/>

guided by a clear roadmap and action plan developed in consultation with key stakeholders including CSOs.

- Stop all exports of agrochemicals banned in the European Union and other countries
- Shift from conventional agriculture to agroecology farming
- Regulate the quality and importation of agricultural chemicals into the country and their distribution
- Implement both the National Organic Food Policy and section 18 of the Agriculture Chemicals (Control) Act 2007 which provides for regulation of the use, transport, storage advertisement and disposal of pesticides. Introduce use of phytosanitary machines to examine food products before their supply on the market by farmers within a period of two years, or such reasonable time as court may deem fit, of passing the judgment in this case. Adopt use of extension workers to promote integrated pesticide management and sensitize farmers on handling and management of agrochemicals and pesticides.
- Expedite the process of reviewing the regulations, taking into consideration the East African Harmonized Pesticides Management Guidelines. Promote markets for organic products to promote health, and environmental and economic benefits.
- Develop a national strategy for the gradual phase-out of highly hazardous pesticides in Uganda
- Mitigate climate change and adapt to its impacts and reverse biodiversity loss
- Introduce use of phytosanitary machines to examine food products before their supply on the market by farmers within a period of two years, or such reasonable time as court may deem fit, of passing the judgment in this case.
- The Committee to study the effectiveness of agrochemicals should expedite its work and release findings.
- Increase funding for the MAAIF and NDA to support their monitoring of the manufacturing, sale and distribution of agrochemicals in the country
- Operationalize the National Organic Agriculture Policy 2019.
- Enforce the Presidential directive with regard to cancelling titles in the wetlands and evict occupants so as to save the nation and the riparian countries surviving on the water from river Nile.

Non-State Actors;

- Strengthen research and extension in the fields of agroecology and organic farming

Conclusion:

As CSOs, we call upon the Government and MDAs to urgently audit the chemical and agrochemical manufacturers and suppliers in Uganda and ban hazardous agrochemicals, monitor the sale, use and regulate the promotion of agro-chemicals in Uganda.

Editor's Note:

1. Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI) Uganda is a Non-Governmental Organization that works to promote pro development

trade, fiscal and related policies for sustained equitable development and improved livelihoods in Uganda and the East African Community region.

2. Food Rights Alliance (FRA) is a coalition of over 40 members comprised of local and international NGOs working on issues of agriculture, food and nutrition security at household, community and national level.
3. The Center for Food and Adequate Living Rights (CEFROHT), is a human rights not-for-profit organization that applies a human rights-based approach to food, nutrition, trade, and investment systems and its linkage to the right to health and adequate living.
4. African Institute for Culture and Ecology (AFRICE) is an NGO and a network of Organizations and individuals committed to promoting African customary and traditional governance systems long suppressed by colonialism.
5. The National Association of Professional Environmentalists (NAPE) is an action organization committed to sustainable solutions to Uganda's most challenging environmental and economic growth problems.

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