

**MINUTES OF THE OPEN HOUSE WITH THE ASSOCIATIONS OF PESTICIDE  
INDUSTRY ON 27<sup>TH</sup> MAY, 2014 AT 1500 HRS IN THE CIPMC AUDITORIUM,  
FARIDABAD**

An Open House with the Associations of Pesticide Industry was organized on May 27, 2014 at 1500 hours in the CIPMC Auditorium, Machinery Stores Premises, Faridabad under the Chairmanship of Dr. Gurbachan Singh, Chairman, ASRB & Registration Committee (RC). The list of participants is **annexed**.

At the outset, the Chairman welcomed the participants, representing various Associations of Pesticide Industry, members and experts of the Registration Committee besides officers of CIPMC. The Chairman informed the representatives of the industry that the Government is committed to provide encouragement to introduction of better technology and more sophisticated infrastructure to augment better manufacturing facilities. Speedy remedial action in granting registration tops the agenda. He acknowledged the commitment of the RC in promoting bio-pesticides in the country to reduce reliance on chemical pesticides to minimize the problems related to residues. The consumption figure of 2% of bio-pesticides at national level is dismal and indicates the quantum of efforts that needs to be made in this direction. The industry should come up with certain measures to provide good quality of bio-pesticides so that the end-user is encouraged. He desired that producers of genuine bio-pesticides should come up with concrete information about the fake bio-pesticides and their manufacturers, who fleece poor farmers and ruining the beautiful approach of Plant Protection, namely Integrated Pest Management (IPM). He was categorical in informing the participants that all the issues raised by the associations of pesticide industry in the earlier Open Houses have been taken to their logical conclusion. He hoped that the participants have come up with new ideas and problems resolving approach so that more time is available for meaningful deliberations and covering the whole range of issues.

The APPA & Secretary (CIB&RC) gave a gist of functioning of the Secretariat during the intervening period from the last Open House and informed among roaring applause that a record-breaking number of Certificates of Registration, 10,023 were issued during the last financial year despite persistent constraints, i.e. without additional manpower or infrastructure. All the participants univocally praised the effort of the Secretariat. It followed by introduction of the participants.

The PPA informed that efforts are being continuously made to improve the overall infrastructure of the Secretariat of CIB&RC. Procedures in Government take some time. He assured that a huge change in the manpower, equipment and machinery is envisaged in future so that the best of services could be provided to the industry. Efforts to make filing of applications paperless are going on and it would be completed in phases. He informed the House that the Department of Agriculture & Co-operation (DAC) is also very keen on modernizing the Sectt of CIB&RC for providing efficient services to the Indian Pesticide Industry.

The representatives of various associations of Pesticide Industry appreciated the progress made in issuance of certificates. They expressed satisfaction that several issues, raised during previous Open Houses, have been resolved by the RC. They expressed happiness over the fact that the RC has been keeping its word of holding the open house twice a year and, thus,

providing an opportunity of open interaction on important and specific issues. Major issues, raised by the associations and the decision thereon are given hereunder:-

S. No.	ISSUES RAISED BY THE ASSOCIATIONS	DECISION OF THE OPEN HOUSE
<b>I. CHEMICAL PESTICIDES</b>		
1.	<b>Laboratory approvals for conducting studies for Pesticide Registration</b>	Industry Associations requested to expedite the process of approval of various 'testing facilities' for generating of data for Registration purpose. Secretary (CIB&RC) informed the house that the process of their approval is in advance stage. In all probability, such facilities shall stand approved before holding of the next Open House.
2.	<b>Implementation of the Kanungo Committee Report (KCR) on Harmonized Toxicological Protocols (except Operator Exposure Study (OpEx))</b>	Industry Associations requested for implementation of KCR at the earliest. It was clarified that these will be available within 3 months for implementation.
3.	<b>Industry representation in the Sub-committee on Minor Change in formulation</b>	Industry Association requested that adequate representation may be given to the industry associations in the Expert Committee constituted by RC for suggesting minor changes in formulation. The Secretary (CIB&RC) informed that an Expert Committee has been constituted under the Chairmanship of Dr. (Ms.) Shalini Chawla, Professor, MAMC, New Delhi for suggesting the guidelines on the above matter. It was agreed to consider the association of major Associations, viz. CropLife India (CLI), Crop Care Federation (CCFI) and Pesticide Manufacturers and Formulators Association of India in the process.
4.	<b>Twin packs guidelines</b>	It was decided that guidelines may be revisited for further refinement.
5.	<b>Bulk packaging</b>	The Industry Associations appreciated the efforts made by the RC on the issue of bulk packaging in the past. It was decided to review the guidelines, already framed by the RC in its 200 <sup>th</sup> meeting, before their implementation.
6.	<b>Guidelines for registration of TI V/s TIM u/s 9(3)</b>	The Chairman, CCFI expressed unhappiness over the changing of guidelines for TI vs. TIM particularly issue related to chemical equivalence category and categorically stated that industry association were not taken into confidence. The Chairman, ASRB

		& RC informed that the Committee has already taken a considered view on the issue and accordingly guidelines have been reviewed and finalized by making an Expert Committee under the Chairmanship of PPA, which also consulted the associations of pesticide industry and accordingly a minor change was duly made so that the applications are not rejected at preliminary scrutiny stage. As such, the issue stands settled. However, the RC will take a view again while considering these minutes in its meeting in due course.
7.	<b>Guidelines for 9 (3) (New Source) V/s TI</b>	Industry Association raised the issue that for registering new source, bio-efficacy data need to be generated in all the gaps already approved for use, which is very cumbersome and need lot of resource. It was explained that a few guidelines were reviewed in the recent past and that this issue shall also be looked into while considering the minutes in the meeting of the RC.
8.	<b>Bio pesticides laced with chemical pesticides</b>	Industry representative informed the market is flooded with bio-pesticides laced with chemical pesticides, thus, ruining and bringing bad name to the beautiful environment-friendly approach of plant protection, IPM. Some unscrupulous elements are engaged in manufacture of spurious bio-pesticides, which operate flight-by-night. They are reaping the benefit at the cost of crops of poor farmers. Secretary (CIB&RC) urged the industry of genuine bio-pesticides to come up with concrete information about such manufacturers or the places where such activity is being carried out so that they can be brought to the book. Such information shall be kept confidential.
9.	<b>Streptomycin Sulphate + Tetracycline Hydrochloride</b>	The issue was raised that some of the manufacturers are selling Streptomycin Sulphate 90% + Tetracycline Hydrochloride 10% as Streptomycin Sulphate 9% + Tetracycline Hydrochloride 1% under the garb of 9:1. Secretary (CIB&RC) informed that this issue has already been discussed and decided in the 342 <sup>nd</sup> Meeting of RC held on 27 <sup>th</sup> September, 2013 and a public notice has been issued accordingly for compliance by all concerned. It was further decided that a letter may also be addressed by the Secretary (CIB&RC) to all the State Commissioners/Directors of Agriculture in this regard.
10.	<b>Export of products enjoying regular registration</b>	Industry proposed that once a product has been registered under the export category, its further registrations should be granted in respect of other applicants without much ado. Secretary (CIB&RC) informed that RC has already decided to grant subsequent registrations on regular basis once a product has been registered for export u/s 9(3).

<p>11.</p>	<p><b>I Illegal import of Pesticides</b></p> <p><b>(a) Illegal sale of imported pesticides in domestic market against import for export registration etc.</b></p> <p><b>(b) Illegal import of pesticides from doubtful sources.</b></p>	<p>It was informed that some of the pesticides registered in India are reportedly imported from un-approved sources in illegal manner and sold into the Indian Market. Some of the Chinese Companies hitherto registered with Secretariat of CIB&amp;RC as approved source have even ceased to exist. Yet, the fact was not brought to the notice of the RC and illegal imports were continued.</p> <p>The Secretary (CIB&amp;RC) informed that the list of approved source of import is available on the website of CIB&amp;RC, which is dynamic and is being updated regularly for the benefit of the users. He urged that any change in the status of approved source(s) may be brought to the notice of the RC by the registrant concerned as also by others who happen to gain knowledge about it as a national responsibility. It was also decided that a letter may be written to the Member (Customs), Central Board of Excise and Customs, Department of Revenue, Ministry of Finance, North Block, Central Sectt, New Delhi-110 001 to inform the Customs Officers posted at all international transit ports/points to be cautious about it and do not let illegally imported consignments pass through such ports/points. Even a few kilogram quantity of products like Bromodialone, which can be even illegally brought in accompanied baggage, is sufficient to produce tons of its approved formulation of 0.005%. Monitoring quality of pesticides of imported consignments is as important as that produced in manufacturing premises domestically. Quality violators may be brought to the book by way of administrative and legal actions.</p> <p>Further, it was also decided that veracity of all source approved for import of pesticides (Technical and Formulation) may be got verified from the regulatory authority of the country, where the manufacturing premises of such source is located.</p>
<p>12.</p>	<p><b>Court case about import of formulations without registering the technical</b></p>	<p>The Secretary (CIB&amp;RC) informed that the matter is sub-judice in the Hon'ble High Court of Gujarat and the final Order is yet to come. Therefore, decisive action could be taken only on receipt of the same.</p>
<p>13.</p>	<p><b>Guidelines for grant of registration of insecticides for export only under section 9(3) of the Insecticides Act, 1968 (Ref. point no.3.1 of 347th RC Minutes)</b></p>	<p>The revised guidelines for registration under export only categories have been approved by RC, which shall come into force w.e.f. July 01, 2014. The Secretary informed that, except deficient cases, there is no delay in grant of registration under export categories. Onus of providing justifiable reply to deficiencies rests with the applicants. He suggested that there should be a reasonable timeline for submitting reply to deficiencies under this category, after which the applications may be closed permanently.</p>

14.	<p><b>Verification of Testing Facilities for Generating and Accepting toxicity studies data for GLP certified/compliance laboratories for the purpose of Registration of Pesticides.</b></p>	<p>The associations of pesticide industry requested the RC to reconsider its decision of restricting toxicity studies only from GLP certified laboratories. Such a condition is likely to cause problems in timely testing of products for data generation and lead to delays.</p> <p>RC categorically clarified that 26 GLP laboratories are existent in the country for such studies. More could be in the offing. This situation is going to arise at least once, as &amp; when this requirement is imposed. Therefore, earlier, the better. There could be teething problems, which have to be borne with. The situation shall ease with the progress of time.</p>
15.	<p><b>Documents to be filed along with the registered applications u/s 9(4).</b></p>	<p>Once again, the associations of pesticide industry raised the issue related to the documents which are to be submitted with applications for registration of formulations manufacture, and Technical and Formulation import under Section 9 (4). The Secretary (CIB&amp;RC) reiterated that the issue has been discussed with the officials of NIC who expressed their inability to modify the existing software. The Secretary (CIB&amp;RC) also clarified that the office bearers of a company, their status, address of manufacturing premises/corporate office, etc. keep changing from time to time. Therefore, submission of requisite documents for grant of registration under this category cannot be dispensed with.</p>
16.	<p><b>Categorization of filing applications under section 9(4) by the existent and the new applicants</b></p>	<p>Associations of pesticide industry pointed out that some of the new manufacturers/ entrants are applying for grant of registration in bulk (upto 250 applications at one go), which makes it near impossible for old/existing applicants or those who wish to obtain limited number of registrations to get registration certificates within a reasonable time. They also suggested that some kind of mechanism may be devised to ease the process for getting registration by old/existing applicants. One suggestion was to enhance the application fee upto Rs.20, 000/- as 'Tatkal Charge' for obtaining quick registration. For this purpose, they went on suggesting that the applicants may be categorized into two groups, as under:</p> <p>(a) Old/existing applicants; and (b) new applicants.</p> <p>The Secretary (CIB&amp;RC) informed that the RC functions under statutory provisions of the Insecticides Act, 1968, which does not permit such categorization in dealing of applications for grant of registration. He lamented that as &amp; when the RC tries to regulate and streamline the receipt of applications to facilitate quick registrations to meet genuine needs, one of the associations seeks</p>

		legal recourse against it. The RC has, therefore, decided to adopt 'first come, first serve' basis to deal with the applications. RC is open to considering innovative ideas, provided all the associations have consensus on the issue.
17.	<b>Visiting hours in the Secretariat of CIB&amp;RC on visitors day.</b>	<p>The Industry vociferously raised the issue of limited visiting hours in one tone as 'not sufficient' and requested that the same may be extended to full day.</p> <p>The Secretary (CIB&amp;RC) pointed out that two hours in the afternoon of every Tuesday and Thursday were allocated as 'Public Visiting Hours', which accounts for substantial time of Experts. In case, more time is allowed, the experts shall have less time for scrutiny of applications. On insistence, the Secretary (CIB&amp;RC) accepted the demand of the industry associations to extend the visiting hours from 14.30 – 16.30 hours to 14.30 - 17.15 hours on every Tuesday and Thursday.</p>
18.	<b>Validity of the Manufacturing License</b>	The Industry Association informed that recently the Govt. of India has issued Gazette notification by amending the Insecticides Rules for household pesticides by increasing the validity of license period to 10 years. They informed that as per the Rule 11 of the Insecticides Rules 1971 the validity of the Manufacturing License of Pesticides is for a Period of 2 years. Secretary (CIB & RC) clarified that Government of India has increased the duration of retail sale license for household insecticides from 2 years to 10 years. However, there is no change in the duration of licenses with regard to any other license, including the manufacturing license.
19.	<b>Technical should be sold to the MSME sector by large and Multinational companies</b>	The Secretary (CIB&RC) informed that the functions of the RC do not encompass commercial aspects, nor does the Insecticides Act, 1968 provides such powers to the RC which could bind a manufacturer to earmark selling of 50% quantity of technical grade insecticides to the small and medium entrepreneurs. All the associations of pesticide industry also did not support the idea.
20.	<b>Delay in issuance of Certificates Endorsement, FSC etc.</b>	Industry Association has raised issue regarding delays in issuance of certificates etc. Secretary (CIB&RC) clarified that Secretariat is trying their level best to complete the follow up action on the RC decision and as such there no general delay in issuance of Certificates after the decision of Registration Committee. However, if there is a specific case that may be brought to the notice of Secretary (CIB&RC), instead of bringing such issues in Open House.

<b>II BIO-PESTICIDES</b>		
1.	<b>Request for fixation of date for organizing workshop on Bio-pesticides.</b>	Associations of bio-pesticide manufacturers informed that they are planning to hold a workshop on the bio-pesticides. Secretary (CIB&RC) welcomed it and assured if any kind of help is required in organizing the proposed workshop, Sectt of CIB&RC would be happy to extend a helping hand. He also desired that the proposed workshop be held at an early date.
2.	<b>Request for acceptance of Toxicological Data generated by NABL accredited Laboratories alongwith the GLP accredited Laboratories</b>	Associations of bio-pesticide manufacturers informed that there are certain parameters of Medico-toxicological laboratory which falls under the purview of NABL and, therefore, suggested that the data generated at NABL accredited laboratory may also be accepted. It was clarified that all the parameters related to the toxicology studies are covered under GLP accreditation. As a decision in this regard has already been taken considering all the issues, it would be appropriate to maintain the same.
3.	<b>Request for Harmonization of Existing Toxicological Testing Guidelines/protocols for Bio – pesticides</b>	Associations of bio-pesticide manufacturers demanded that a Technical Expert Committee, with adequate industry representation, for harmonization of existing toxicological testing guidelines for bio-pesticides may be constituted to resolve the problems in this area. It was decided to constitute an Expert Committee to look into the Toxicological Testing Guidelines & Protocols.
4.	<b>Request for formation of Guidelines for Registration of Combination of two registered compatible bio-pesticides</b>	Association of bio-pesticides manufacturers informed that combination of two compatible bio-pesticides is allowed worldwide. Accordingly, new guidelines may be formulated for seeking registration of combination of two compatible bio-pesticides in India too. It was pointed out that bio-pesticides are quite effective individually, if used properly. What was the justification for combining two bio-pesticides? It was, however, decided to refer this issue also to the already existing Expert Group on Bio-pesticides.
5.	<b>Request for formation of Guidelines for Registration of Combination of two registered compatible botanical pesticides</b>	Associations of bio-pesticide manufacturers informed that combination of two registered compatible botanical pesticides is allowed worldwide. Accordingly, new guidelines may be formulated for seeking registration thereof in India too. It was pointed out that the same query is valid here too. However, it was decided to refer this issue to the existing Expert Group on Bio-pesticides.

6.	<b>Exemption from submission of sample at the time of registration of bio-pesticide u/s 9(3).</b>	Representatives of bio-pesticide manufacturers pointed out that the Sectt of CIB&RC seeks for submission of sample of the proposed product at the time of regular registration u/s 9(3) even if the same had been tested at the time of registration u/s 9(3B). The Secretary (CIB&RC) informed the house that there are several reasons for it, viz. failing of a lot of samples in CIL at the time of registration u/s 9(3), applicants seeking higher shelf-life at the time of regular registration, etc. despite the fact that the sample of the same product had passed at the time of provisional registration u/s 9(3B). Therefore, there is no harm, if the RC wants to get satisfied with the quality of the product twice. Hence, dispensing with this requirement is not considered appropriate. It shall, however, be ensured that no application gets delayed on this account.
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The meeting ended with a vote of thanks to the Chair.

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**Annexure****List of Participants in Open House Meeting with Industry Association**

Sl. No.	Name & address	E-mail	Mobil no.
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12.	A.K. Rai, DD (PP)	-	-
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42.	Mr. P.P. Dave	PMFAI	26734846
43.	Mr. Y Nayvdamma	APPMA	09866013369
44.	Mr. P.S. Rawat	UPL	9811120305
45.	Mr. Raj Kumar Singh	PMFAI	9811110920
46.	Dr Uday Kumar Srivastava	Bharat Insecticides Ltd.	9560466553
47.	Mr. M. Raghavender	CCFI	9930266992
48.	Mr. Abhay Gupta	CCFI	9873928418
49.	Mr. N N Mishra	MGRIA	9891649000
50.	Dr. Prasad M.P.	HICA, S. C. Johnson P.P. Ltd. Delhi	9910084135
51.	Mr. Bimal D Shah	Sulphur Mills/CCPI PMFAI	9820939410
52.	Mr. Yogita Kole	Sulphur Mills	9967572569
53.	Mr. Ambuj Bhardwaj	Bayer Crop Science Ltd.,	7042316633
54.	Mr. Subhash Singh	Bayer	9910728348
55.	Mr. Kishor Nahar	Bayer (CLI)	9820296598
56.	Mr. R.D. Kapoor	CCFI	9810071998
57.	Mr. Sushil Misra	CCPPL	9540467888
58.	Mr. J.C. Malik	CCPPL	9810459825
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60.	Mr. Satis Kumar	Excel Agro Tech	8470034917
61.	Mr. Subhash Khurana	Pesticide Manufacture Association Karnal (HR)	9416636747
62.	Mr. Anil Kumar	Willowood Chemicals (P) Ltd.,	9654769012
63.	Mr. T.L. Mohan Rao	Charier chemical (I) Ltd.,	984129037
64.	Mr. Gautam	CCIL	
65.	Mr. Chaitaya	CCIL	9769664084
66.	Mr. Manish Singh	CCIL	9899793985
67.	Mr. S.M. Ahsan.	PI. Industries	9871014540
68.	Mr. Ilesh Mistry	Regi. Cons.	9322331959
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74.	Mr. G. Shari Kanth	Ajay Bio Tech (I) Ltd.	9890337370
75.	Mr. S. Bhardnay	Sulphur Mills	9818869918

76.	Mohd Usman Mansoori	Krishi Rasayan Export Pvt. Ltd.,	8010289149
77.	Mr. Rajan Chauhar	Parijat Industries	9873334313
78.	Mr. Vijay Jha	Rallis India	9810991089

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