

CropLife South Africa Position Statement: 6 November 2023

Chlorpyrifos and Cartap Hydrochloride Situation in South Africa

CropLife SA strongly urges all its members and farmers in South Africa to exercise caution with the volumes of agricultural remedies, based on the active ingredients chlorpyrifos or cartap hydrochloride, that are currently being sold by agricultural remedy suppliers / distributors, and that are being bought by South African farmers.

This cautionary note is issued because the future of local registrations for both the sale and use of agricultural remedies, based on the active ingredients chlorpyrifos and cartap hydrochloride, is limited.

Further, the official removal of maximum residue limits (MRLs) for chlorpyrifos and cartap hydrochloride from the list of authorised MRLs is expected soon.

The final revocations of both registrations for agricultural remedies containing chlorpyrifos or cartap hydrochloride as active ingredients, plus the current applicable MRLs for chlorpyrifos and cartap hydrochloride, can be published in the South African Government Gazette at any time. Hence this request for all parties to exercise caution to avoid unusable volumes of chlorpyrifos- or cartap hydrochloride-containing agricultural remedies circulating in the value chain once the ban on the sale and use of impacted agricultural remedies enters into force.

Background Information

30 September 2020

- Communication from the Registrar (Act No. 36 of 1947) informing all registration holders of agricultural remedies containing chlorpyrifos and cartap hydrochloride as active ingredients that:
 - o The Department of Health (DoH) has decided to revoke all published MRLs for chlorpyrifos and cartap hydrochloride in South Africa.
 - This decision was based on risk assessments conducted by the DoH.
 - The DoH is taking this action in accordance with:
 - *Regulations Governing the Maximum Residue Limits for Pesticide residues that may be present in Foodstuffs, No. R246 of 1994 under the Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Act No. 52 of 1972).*
 - o As a result of this decision by the DoH, the Registrar informed all registration holders that he intended to revoke all local SA registrations for agricultural remedies containing chlorpyrifos or cartap hydrochloride.

26 June 2023

- The Minister of Agriculture published in the Government Gazette (No. 3605) her intention to '*prohibit the use of agricultural remedies containing chlorpyrifos and cartap hydrochloride as active ingredients*'.
- Further, this notification included a 60-day public comment period.

Expectations

- MRLs
 - o The revocation of MRLs for chlorpyrifos is pending. Timeline is unknown, but it could be any day as of now. The DoH has circulated a draft list of authorised MRLs and entries for both chlorpyrifos and cartap hydrochloride are NOT included. The official removal of these MRLs will occur when the draft MRL list is published in the Government Gazette.
- Registrations to be revoked:
 - o Registrations of agricultural remedies containing chlorpyrifos or cartap hydrochloride could be revoked at any time as the public comment period has elapsed.
 - o The Minister of Agriculture could feasibly publish (in the Government Gazette) the final decision to ban the use of chlorpyrifos and cartap hydrochloride as agricultural remedies any day now.