

# Combating Illegal and Counterfeit Pesticides

## Strengthening National Systems, Partnerships, and Trade Controls

Date: 24 March 2026  
Time: 10:00 CET



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ASEAN Bio-innovation and IPM Action Plan & FARM, UNEP

# The FARM Programme

Financing Agrochemical Reduction and Management (FARM) programme advances sustainable finance to transform agriculture by reducing reliance on:



harmful pesticides



agricultural plastics



ECUADOR



URUGUAY



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INDIA



VIET NAM



LAO PDR



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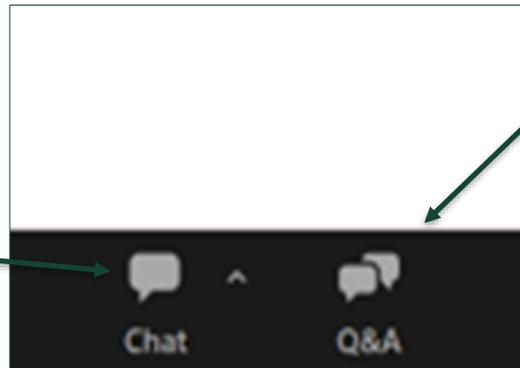


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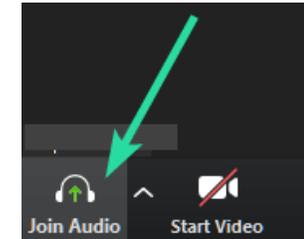
## Interaction & Housekeeping

Use **Chat** to make a comment to everyone (e.g. thanking speakers, sharing links, highlighting important points, introducing yourself).



Use the **Q&A** button to ask questions to the speakers

Audio issues? Click "Join audio" and increase volume



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Illegal and counterfeit pesticides represent a growing global challenge with serious implications for food safety, farmer livelihoods, environmental protection, and human health. These products may include:

- **Banned or restricted pesticides:** Products prohibited under national law but still produced, sold or used.
- **Counterfeit pesticides:** Products falsely labelled as legitimate brands or imitations of registered products.
- **Unregistered pesticides:** Products not approved by the national regulatory authority.
- **Mislabelled or fraudulent products:** Pesticides with incorrect labels, misleading information or falsified composition.
- **Smuggled or illegally imported pesticides:** Products entering a country without a customs declaration or regulatory approval.
- **Substandard or adulterated products:** Products that fail to meet quality standards, are no longer authorised or fit for purpose, or contain incorrect active ingredients.

The trade in illegal pesticides undermines regulatory systems, legitimate markets, and efforts to promote safer and more sustainable pest management. Addressing this issue requires coordinated action across regulatory authorities, customs, law enforcement, industry, and international organisations.

The **GEF FARM Programme (Financing Agrochemical Reduction and Management)** works with governments and partners to strengthen pesticide governance, support sustainable pest management and mobilise investment for safer agricultural systems. Addressing illegal pesticide trade is a key component of this transition.

### Scale of the problem

Globally, illegal and counterfeit pesticides represent:



### Impacts

Illegal and counterfeit pesticides have significant impacts on:



#### Health

These products may contain banned, incorrect or unknown chemical ingredients, exposing farmers and agricultural workers to highly toxic substances and increasing the risk of pesticide poisoning.



#### Environment

Illegal pesticides can contaminate soil, water and biodiversity, and harm or kill pollinators and other beneficial organisms.



#### Efficacy and Sustainable Practices

Substandard or falsified formulations may also fail to control pests or damage crops, leading to production losses or increased pesticide use as farmers resort to more/different pesticides to control pests. This undermines Integrated Pest Management (IPM) and other good agricultural practices.



#### Trade

The presence of unapproved pesticide residues in food can lead to rejected export shipments and damage to a country's agricultural reputation.



#### Markets

Illegal trade also undermines legitimate pesticide markets, distorts competition by undercutting regulated products and results in lost tax revenue and enforcement costs for governments.



#### International Cooperation

The trade in illegal pesticides undermines international efforts to strengthen the sound management of chemicals and waste, including the Global Framework on Chemicals (GFC) and the Basel, Rotterdam and Stockholm Conventions.

# FARM Guidance Notes Series

## #1 Addressing Illegal and Counterfeit Pesticides



**Click here to download:**  
[FARM Guidance Note:  
 Addressing Illegal and Counterfeit Pesticides](#)



Time (CET)	Subject	Speaker
10:00	Opening & Context settings	Moderator
<b>Country Perspectives</b>		
10:05	Presentation 1: Building the Capacity of Customs and Border Control Officials in Lao PDR to Identify and Respond to Illegal Pesticide Trade	<b>FARM Lao PDR</b>
10:15	Presentation 2: Approaches to Combat Illegal Pesticides in Kenya	<b>Pest Control Products Board Kenya</b>
10:25	Questions to Country Teams	Moderator
<b>Industry &amp; International Enforcement</b>		
10:35	Presentation 3: Countering Illegal Pesticides: Industry Collaboration, Enforcement Partnerships and Emerging Risks	<b>CropLife Asia</b>
10:45	Presentation 4: AI and Intelligence Sharing: Lessons for Operations Against Illicit Pesticides Trade	<b>Syngenta</b>
10:55	Discussion	Moderator
<b>International Frameworks</b>		
11:05	Presentation 5: The International Code of Conduct on Pesticide Management: Global Guidance on Illegal Pesticides	<b>FAO</b>
11:10	Presentation 6: The PIC Procedure in Practice: Preventing Illegal Trade Through Information Exchange	<b>BRS Secretariat</b>
11:15	Q&A	All
11:28	Closing of webinar	Moderator



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# Building the Capacity of Customs and Border Control Officials in Lao PDR to Identify and Respond to Illegal Pesticide Trade



DOA and FARM Lao PDR Project Team | 24 March 2026



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ASEAN IPM Action Plan  
Accelerating Regional Bio-Innovation

# Content



Country Context:  
Lao PDR



Institutional Arrangements  
and Key Stakeholders



Current Pesticide  
Management  
Context



Capacity Building  
Approach and  
Activities



Project Objectives  
and Results



Key Challenges and  
Way Forward

# Lao PDR

area

**236,800** km<sup>2</sup> | **18** provinces | **3** zones

population

~ **8** million people (as of 2025) | **70%** of population dependent on agriculture

**58%** Agriculture is the dominant employer | **16.6%** Contributing to GDP

Main crops



Rice



Maize



Cassava



Banana



Sugarcane



Vegetables



Beans

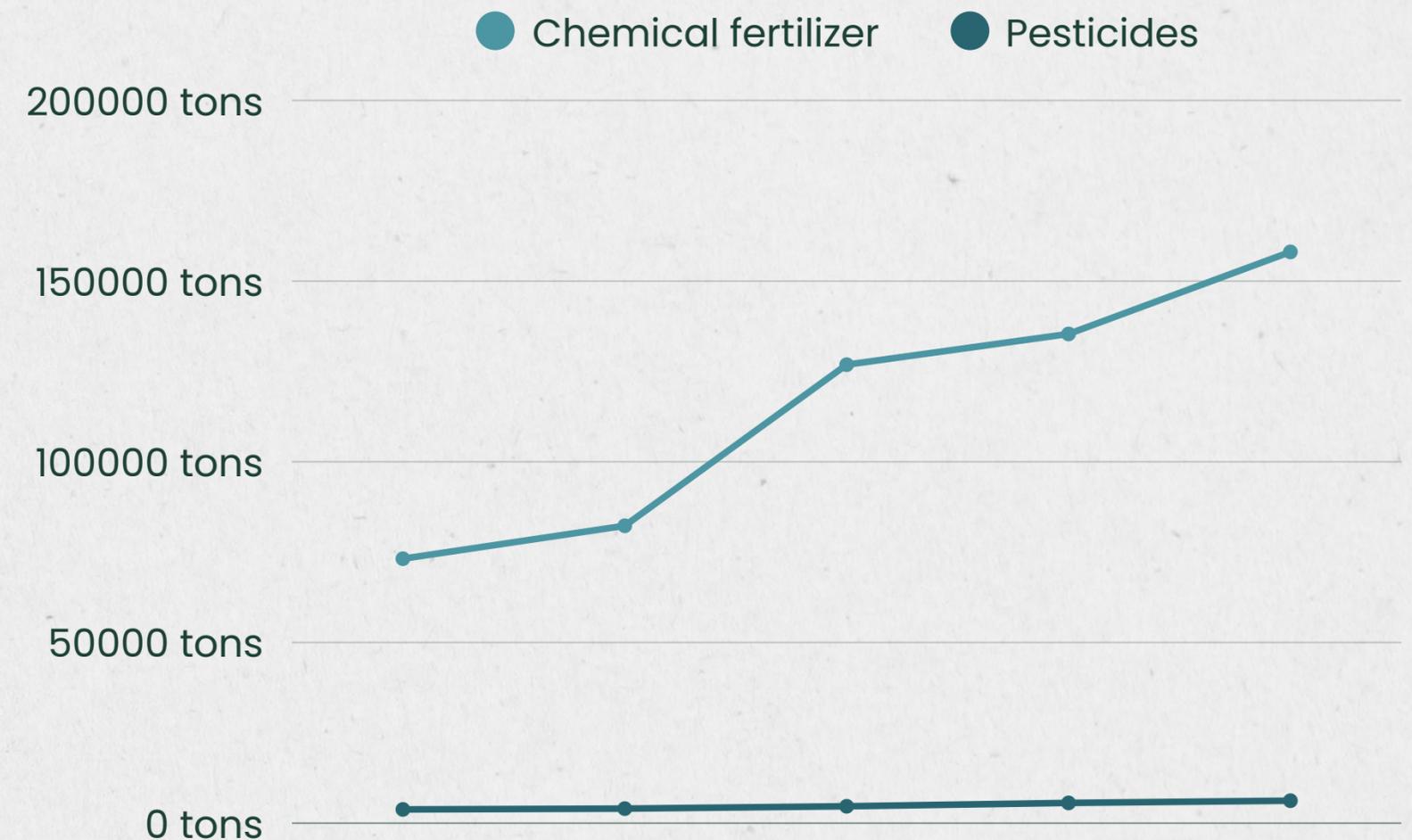


Current

# Pesticide Management



- **Rising pesticide** use driven by expanding agricultural productivity
- Cross-border trade creates **risks of illegal or unregistered pesticide imports.**
- **Limited capacity** of border and customs officials to identify harmful or illegal products.
- Continued trading, **use and advertising of banned pesticides**



Challenges in

# Pesticide Regulation & Control

## Illegal pesticide trade remains a challenge due to

1

Weak inspection capacity at border checkpoints

2

Limited technical knowledge of pesticide regulations among key actors

3

Lack of identification tools for hazardous products

4

Informal cross-border trade through unmonitored routes



Challenges in

# Pesticide Regulation & Control



Risks to  
human  
health



Environmental  
contamination



Undermining  
national pesticide  
regulation

# IMPACT



# Organizational Involvement in Pesticide Control

## NATIONAL

*(Policy Development, Monitoring and Evaluation)*

- **Ministry of Agriculture and Environment (MAE)**
- Department of Agriculture-Regulatory and Input Registration Division, Plant Quarantine Division
- **Ministry of Finance (MOF)**
- Lao Customs Department,
- **Ministry of Industry and Commerce (MOIC)**
- Department of Enterprise Registration and Management
- **Ministry of Public Security**
- Department of Environment Police

## LOCAL

*(Implementation, Monitoring and Reporting)*

Provincial and District Agriculture and Environment Office-Agriculture Section

Provincial and District Custom Office  
Provincial and District Industry and Commerce Office  
Provincial and District Environment Police Office

# Organizational Involvement in Pesticide Control

## LEAD TECHNICAL AUTHORITY

**Department of Agriculture – Plant Protection & Regulatory Input Registration**

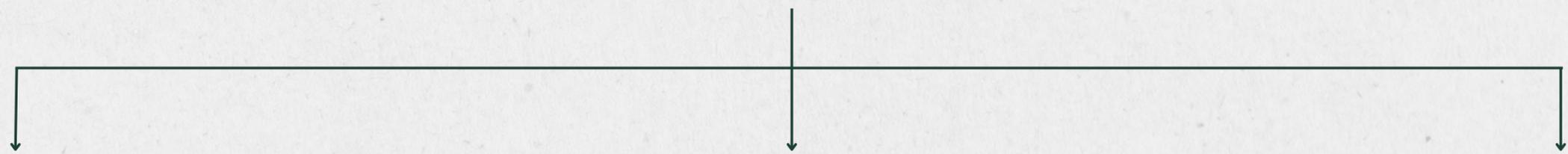
- Registration, approval, and prohibition of pesticide products
- Evaluation of active ingredients and formulation standards
- Issuance of import permits
- Inspection of agrochemical retailers and distributors
- Monitoring pesticide use and compliance at the farm level



**Department of Environment**

- Environmental risk management
- Control of hazardous chemicals
- Waste management and disposal oversight

**Ministry of Agriculture and Environment ( MoAE)**  
Department of Agriculture – Plant Protection & Regulatory Input Registration



**Ministry of Public Security (MoPS)**

- Investigation of organized smuggling networks
- Enforcement of criminal penalties
- Cross-border intelligence coordination



**Ministry of Finance (MOF)**  
Customs Department

- Verification of import permits and documentation
- Inspection of agrochemical shipments
- Detection of smuggling, mislabeling, or false declarations
- Seizure of illegal consignments



**Ministry of Industry and Commerce (MOIC)**  
Department of Enterprise Registration and Management

- Trade Licensing of Importer and Distributors,
- Import and Export Policy Alignment
- Commercial compliance Monitoring

Note: Customs often requires technical verification from plant protection authorities regarding pesticide registration status.

# Capacity Building Approach



Training for customs and border control officers



Development of training materials and identification guides



Institutional coordination between agriculture and customs agencies



Awareness raising on hazardous pesticides

# Training Component



National pesticide regulatory framework



Identification of restricted and banned pesticides



Case studies of illegal pesticide trade



Understanding Highly Hazardous Pesticides (HHPs)



Inspection procedures at border checkpoints



Enforcement action

# Awareness Raising on National Pesticide Regulatory Framework



Implementation of  
Legal Framework

Ministry of Agriculture and Environment – Technical Registration on Pesticides

The Law on Cultivation

Law on Chemical

Decree on Fertilizer

The Law on Plant Protection

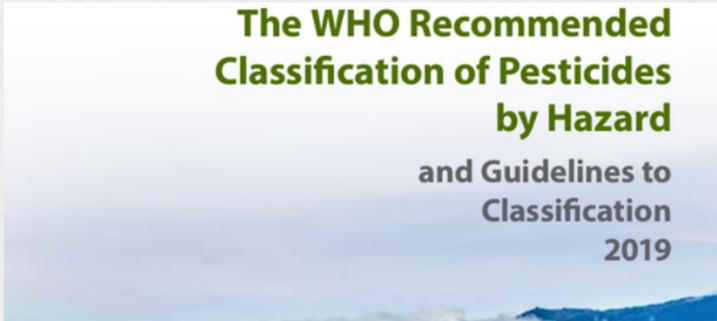
Decree on Pesticide

Decision of Ministry on Pesticide Business Registration Control

Agreement on Technical Registration on Pesticide

# Training on Identification of restricted and banned pesticides

- Using WHO and FAO guidelines and identification manuals
- HHPs identified in Lao PDR include: Chlorpyrifos, Paraquat, Diazinon, Lambda-cyhalothrin, and Glufosinate ammonium



**Table 1. Extremely hazardous (Class Ia) technical grade active ingredients in pesticides**

Common name	CAS no	UN no	Chem type	Phys state	Main use	GHS	LD <sub>50</sub> mg/kg	Remarks	LD <sub>50</sub> for the rat (mg/kg body weight)	
									Oral	Dermal
Aldicarb [ISO]	116-06-3	2757	C	S	I-S	1	0.93	See note 3; EHC 121; HSG 64; ICSC 94; JMPR 1992, 1995	< 5	< 50
Brodifacoum [ISO]	56073-10-0	3027	CO	S	R	1	0.3	EHC 175; HSG 93	5-50	50-200
Bromadiolone [ISO]	28772-56-7	3027	CO	S	R	1	1.12	EHC 175; HSG 94	50-2000	200-2000
Bromethalin [ISO]	63333-35-7	2588		S	R	1	2		Over 2000	Over 2000
Calcium cyanide [C]	592-01-8	1575		S	FM	2	39	Adjusted classification; see note 1; ICSC 407	5000 or higher	
Captafol [ISO]	2425-06-1			S	F	5	5000	Adjusted classification; see notes 2 and 3; HSG 49; IARC 53 (Group 2A); ICSC 119; JMPR 1977, 1985		
Chlorethoxyfos [ISO]	54593-83-8	3018	OP	L	I	1	1.8	Extremely hazardous by skin contact (LD <sub>50</sub> = 12.5 mg/kg); ICSC 1681		
Chlormephos [ISO]	24934-91-6	3018	OP	L	I	2	D27	ICSC 1682		
Chlorophacinone [ISO]	3691-35-8	2588		S	R	1	3.1	EHC 175; ICSC 1756		
Difenacoum [ISO]	56073-07-5	3027	CO	S	R	1	1.8	EHC 175; HSG 95		

Class		LD <sub>50</sub> for the rat (mg/kg body weight)	
		Oral	Dermal
Ia	Extremely hazardous	< 5	< 50
Ib	Highly hazardous	5-50	50-200
II	Moderately hazardous	50-2000	200-2000
III	Slightly hazardous	Over 2000	Over 2000
U	Unlikely to present acute hazard	5000 or higher	



# Training on Understanding Highly Hazardous Pesticides (HHPs)



## ຢາປາບສັດຕູພືດຕ້ອງຫ້າມ 55 ຊະນິດໃນ ສປປ ລາວ

ຢາຂ້າແມງໄມ້ ແລະ ຢາຂ້າໄຂ່  
(INSECTICIDES AND ACARICIDES)

- |                                      |  |
|--------------------------------------|--|
| 1. ອອນດອນ (ALDRIN)                   | 32. ໄຊຄລໍເອັກຊີມາຍ (CYCLOHEXIMIDE)                                   |
| 2. ບີເອດຊີ (BHC)                     | 33. ແມກກູຣີ ແລະ ແມກກູຣີຄອມພາວ (MERCURY & MERCURY COMPOUNDS)          |
| 3. ຄວໍດານ (CHLORDANE)                | 34. ເມມອີເອມຊີ (MEMC)  |
| 4. ຄວໍດີມີຟອມ (CHLORDIMEFORM)        | 35. ຝີເອມເອ (PMA)  |
| 5. ຄວໍເຟນວິນຟອສ (CHLORFENVINPHOS)    | 36. ເຊເລນຽມ ຄອມພາວ (SELENIUM COMPOUND) - ຢາຂ້າໝູ (RODENTICIDES)      |
| 6. ຄວໍສີໂອຟັສ (CHLORTHIOPHOS)        | 37. ຄໍໂຣເບນຊີເລດ (CHLOROBENZILATE)                                   |
| 7. ໄຊເອັກຊາຕີນ (CYHEXATINE)          | 38. ໄຊດຽນຟູຣິດອາເຊເຕດ (SODIUM FLUOROACETATE) - ຢາຂ້າຫອຍ (HERBICIDES) |
| 8. ດີເດີ (DDT)                       | 39. 245 ຄີ (2,4,5T)  |
| 9. ດີເອນດອນ (DIELDRIN)               | 40. ໂດໂນເຊບ (DINOSEB)  |
| 10. ດີເມຟອກ (DIMEFOX)                | 41. ໂດໂນເຕບ ອາເຊເຕດ (DINOTERB ACETATE / DINITROBUTYPHENOL)           |
| 11. ດີນີໂຕຣຄຣີໂຊນ (DINITROCRESOL)    | 42. ພາຣາກວາດ (PARAQUAT)  |
| 12. ດີເມໂຕນ (DEMETON)                | 43. ໄຊດຽນ ຄວໍເອດ (SODIUM CHLORATE)                                   |
| 13. ອອນດອນ (ENDRIN)                  | ຢາຂົ້ມຂ້າເຊື້ອນະອາດ ແລະ ແມງໄມ້ (FUMIGANTS)                           |
| 14. ອອນໂດສູຟານ (ENDOSULFAN)          |  |
| 15. ເອທິນພາຣາໂທອອນ (ETHYL PARATHION) |  |
| 16. ອີເປັນ (EPN)                     |  |

17. ເອັບຕາຄໍ (HEPTACHLOR)
18. ເອັກຊາຄໍໂຣ ໄຊຄລໍເອັກຊານ (HEXACHLORO CYCLOHEXANE)
19. ເລັບໂຕໂຟດ (LEPTOPHOS)
20. ລິນດານ (LINDANE)
21. ເມທາມິໂດຟອສ (METHAMIDOPHOS)
22. ເມໂທມິນ (METHOMYL)
23. ເມທິນພາຣາໂທອອນ (METHYL PARATHION)
24. ໂມໂນໂອໂຣໂຕໂຟດ (MONOCROTOPHOS)
25. ໂປລີຄໍໂຣຕາມເຟນ (POLYCHLOROCAMPHENE)
26. ໂປຣຣາຕ (PHORATE)
27. ສະຣາດານ (SCHRADAN)
28. ທີເອັບ (TEPP)
29. ທອກຊານເຟນ (TOXAPHENE) - ຢາຂ້າເຊື້ອລາ (FUNGICIDES)
30. ໂບນາພາຄຣີນ (BINAPACRYL)
31. ຄອບຕາໂຟນ (CAPTAFOL)

44. ອີເອັດ (EDB)
45. ເອທິແລນອິກຊາຍ (ETHYLENE OXIDE)
46. ເມທິນໂບຣອມາຍ (METHYL BROMIDE) ແລະ ອື່ນໆ (OTHERS)
47. ອາເຊນິກຄອມພາວ (ARSENIC COMPOUND) ຜ່ອນຝະຊົມຂອງຢາຂ້າຫອຍ ແລະ ຂ້າແມງໄມ້
48. ແຄລຊຽມ ອາເຊນາດ (CALCIUM ARSENATE) ຂ້າຫອຍ, ຂ້າໝູ, ຂ້າຫອຍ, ຂ້າແມງໄມ້
49. ດີເອັບີ (DBCP) ຂ້າຂີ້ກະເດືອນຝອຍ
50. ດາມິນໍຊິດ (DAMINOZIDE) ຄວບຄຸມການອະເລີນເຕີບໂຕຂອງພືດ
51. ຝູຣູອໍໂອອາເຊຕາມິດ (FLUOROACETAMIDE) ຂ້າແມງໄມ້, ຂ້າໝູ
52. ອັກຊາມິນ (OXAMYL) ຂ້າແມງໄມ້, ຂ້າໄຂ່, ຂ້າຝວກ
53. ຝີຟາມິດອນ/PHOSPHAMIDON INSECTICIDE, NEMATOCIDE (ຂ້າແມງໄມ້, ຂ້າຂີ້ກະເດືອນຝອຍ)
54. ໄຊດຽນ ອາກຊີໂນ/SODIUM ARSENITE INSECTICIDE, FUNGICIDE, HERBICIDE, RODENTICIDE (ຂ້າແມງໄມ້, ຂ້າມະອາດ, ຂ້າຫອຍ, ຂ້າໝູ)
55. ຫາມລຽນ ຊູນຝາດ/THALLIUM (I) SULFATE - RODENTICIDE, INSECTICIDE (ຂ້າໝູ, ຂ້າແມງໄມ້)

### ຄໍາເຕືອນ

- 1 ຜູ້ຂາຍຢາປາບສັດຕູພືດຕ້ອງຫ້າມ ຈະຖືກລົງໂທດຕັດອິດສະລະພາບ ແຕ່ 03 ເດືອນ ຫາ 02 ປີ ແລະ ຈະຖືກປັບໂທ ເພິ່ງເທົ່າຂອງມູນຄ່າຢາປາບສັດຕູພືດ ພ້ອມທັງຜ່ອນຝະຊົມສັດຕູພືດ ທີ່ຜິດກົດໝາຍ ມາດຕາ 145 ຂອງກົດໝາຍຫອຍ
- 2 ສໍາລັບຝູ້ປັ້ງໃຊ້ ຜູ້ ມີຢາປາບສັດຕູພືດໃນຄອບຄອງ ຈະຖືກປັບໂທ ເພິ່ງເທົ່າຂອງມູນຄ່າຢາປາບສັດຕູພືດ ພ້ອມທັງຜ່ອນຝະຊົມສັດຕູພືດທີ່ຜິດກົດໝາຍ ແລະ ຜ່ອນຝະຊົມສັດຕູພືດທີ່ຜິດກົດໝາຍ ທີ່ຈັດຢາປາບສັດຕູພືດ ພືດມາ



ສອບຖາມຂໍ້ມູນເພີ່ມຕື່ມໄດ້ທີ່  
ພະແນກຄະບຽນການ ແລະ ຂຶ້ນທະບຽນປັດຈຳການ  
ຜະລິດ  
ກົມປູກຝັງ, ກະຊວງກະສິກໍາ ແລະ ສິ່ງແວດລ້ອມ  
+856 21 412350; 452 967

# Training on Understanding Highly Hazardous Pesticides (HHPs)

# ຢາ

## ຈຳໜ່າຍແລະໃຊ້ ຜະລິດຕະພັນຢາ ສັດຕູພິດຕ້ອງຫ້າມ!

ຊື່ການຄ້າ: ແລນເບດ  
ຊື່ສາມັນ: ເມໂທນິນ

ຊື່ການຄ້າ: -  
ຊື່ສາມັນ: ເມໂທນິນ

ຊື່ການຄ້າ: -  
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ຊື່ການຄ້າ: ຕາຣາໂຊນ  
ຊື່ສາມັນ: ພາຣາອວັດ

ຊື່ການຄ້າ: ກາໂມັກໂຊນ  
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## ຄໍາເຕືອນ

- 1

ຜູ້ຂາຍຢາຢາມສັດຕູພິດຕ້ອງຫ້າມ ຈະຖືກລົງໂທດ ຕັດອິດສະລະພາບ ແຕ່ 03 ເດືອນ ຫາ 02 ປີ ແລະ ຈະຖືກປັບໂທ ເທິງເທົ່າຂອງມູນຄ່າຢາຢາມສັດຕູພິດ ພ້ອມທັງອິດຢາຢາມສັດຕູພິດ ທີ່ມີລິດກັບພາຍ ມາດຕາ 145 ຂອງກົດໝາຍອາຫາ
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ສຳລັບຜູ້ບໍ່ໃຊ້ ຜູ້ ມີຢາຢາມສັດຕູພິດໃນຄອບຄອງ ຈະຖືກປັບໂທ ເທິງເທົ່າຂອງມູນຄ່າຢາຢາມສັດຕູພິດ ພ້ອມທັງອິດຢາຢາມສັດຕູພິດທີ່ມີລິດກັບພາຍ ແລະ ອຸປະກອນຊອບຕໍ່ໃຊ້ອຳນາດໃນການກຳຈັດຢາຢາມສັດຕູພິດ ມາ

## Key Enforcement Actions

Document review for compliance with the Ministry of Agriculture and Environment system and Ministry of Industry and Commerce requirements and customs mechanisms.

Defined pesticide registration system	Highly Hazardous Pesticide (HHP) Identification	Banned pesticides Identification
Good Management Practice Adoption	Safety Standard adoption	Utilized a digital platform (web application) to track volumes and quotas based on permissions issued by DOA/PAFO

# Enforcement Actions

## Weak Inter-Agency Coordination

Joint inspection protocols and data-sharing platforms remain underdeveloped

---

Informal Cross-Border Trade: numerous traditional and unmonitored crossing points along shared borders facilitate unregulated pesticide flows

---

Weak Market Surveillance: post-import monitoring of distributors and retailers is constrained by limited resources at provincial and district levels

---

Enforcement and Sanctions: penalties for violations are often insufficient as a deterrent, and enforcement procedures lack consistency across agencies

---

Limited Border Inspection Capacity: insufficient trained staff, limited chemical identification equipment, weak risk-profiling systems, and inadequate digital tracking of registered products

# Key Challenges



Contact Details: Lao FARM Project  
Other information: [www.geffarm.org](http://www.geffarm.org)



ສະໜັບສະໜູນໃດຍ



ຊື່ນຳໃດຍ



ຮ່ວມກັບ



ຳດຕັ້ງປະຕິບັດໃດຍ





# PEST CONTROL PRODUCTS BOARD

## Approaches to Combat Illegal Pesticides in Kenya

Presented by :

**Lawrence Kalawa Ikiba**

**General Manager,  
Compliance & Enforcement**

24<sup>th</sup> -03-2026





# OUTLINE

- **What are illegal pesticides?**
- **Types of illegal pesticides**
- **Kenyan Situation/Challenges**
- **Key entry pathways for illegal pesticides**
- **Dangers of illegal pesticides**
- **Strategies for combating illegal pesticides:**
- **Strengthen border control**
- **Enhance enforcement**
- **Market surveillance**
- **Digital monitoring**
- **Awareness creation**
- **Capacity building**
- **Regional cooperation**



# What Are Illegal Pesticides?

Illegal pesticides are pest control products that are not registered, approved, or regulated. They are products that do not comply with the set legal requirements.

- Unregistered products
- Counterfeit/fake products
- Improperly rrepackaged products
- Obsolete/expired products





# Examples of an unregistered pesticides





# Examples of an unregistered pesticides





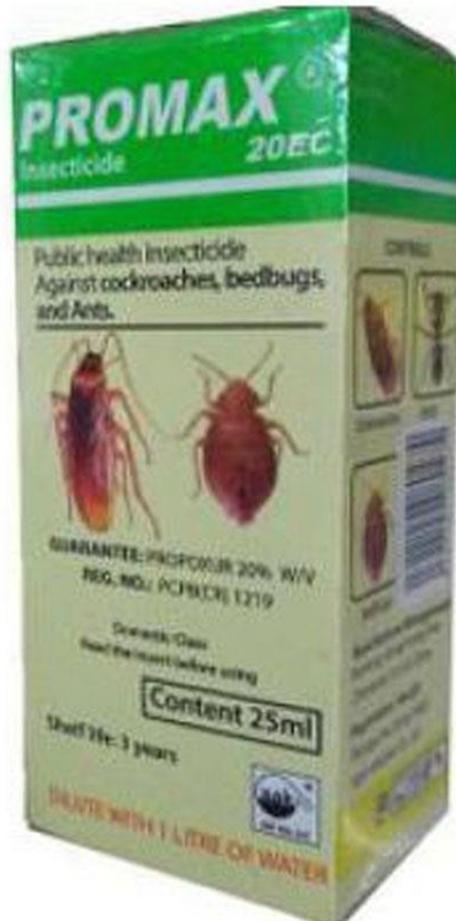
# Examples of an unregistered pesticides





# Examples of counterfeits

**GENUINE**



**COUNTERFEIT**





# Examples of counterfeits



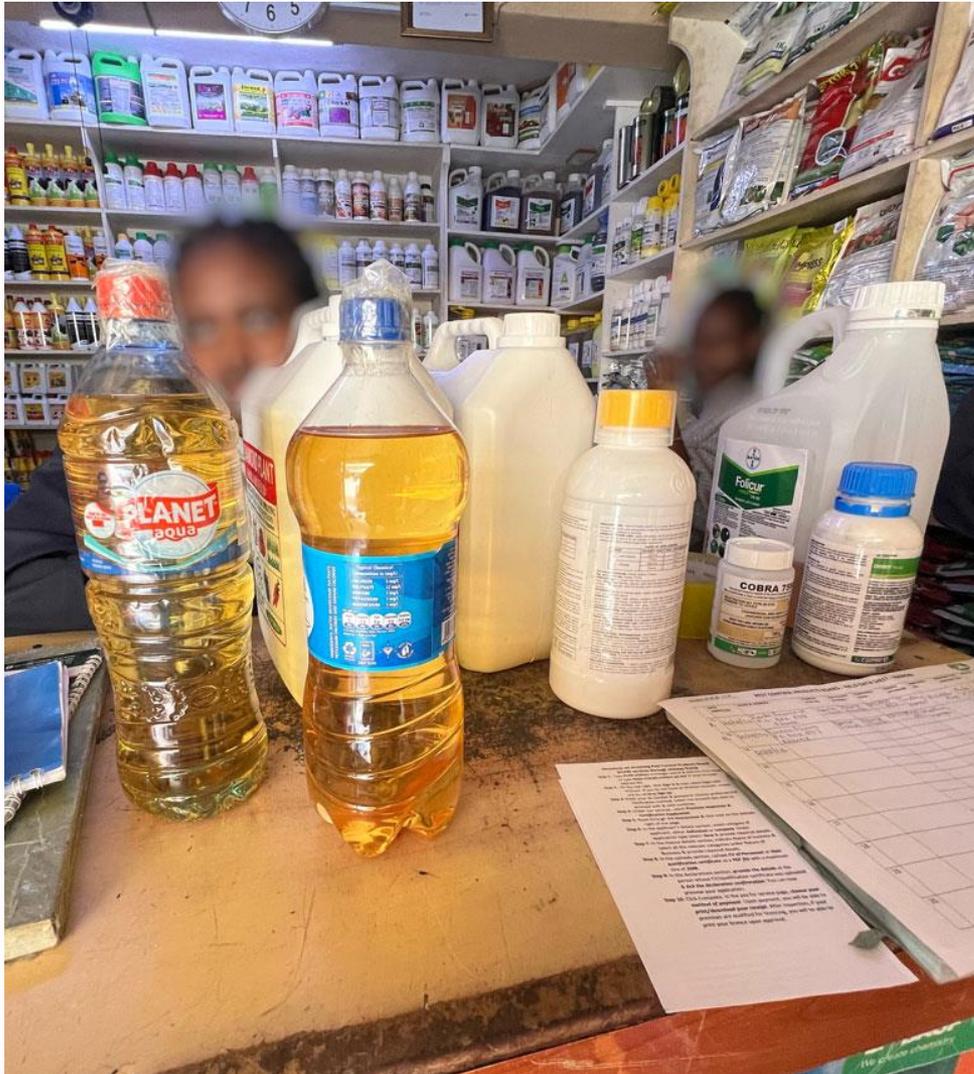


## Improperly repackaged product



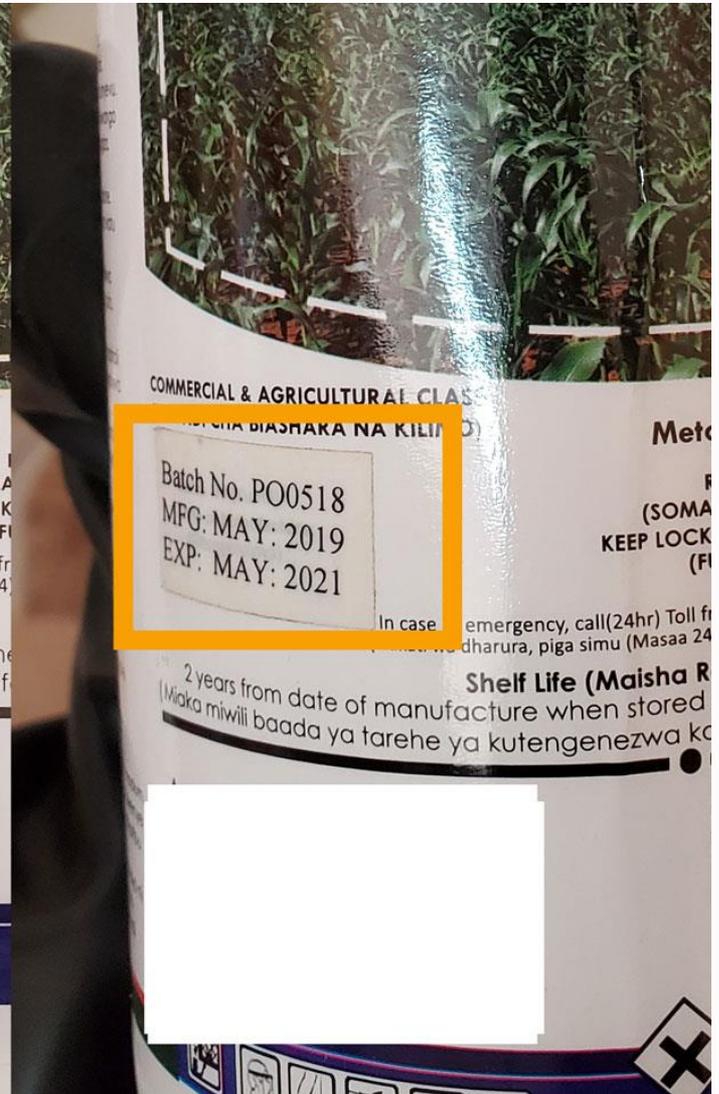
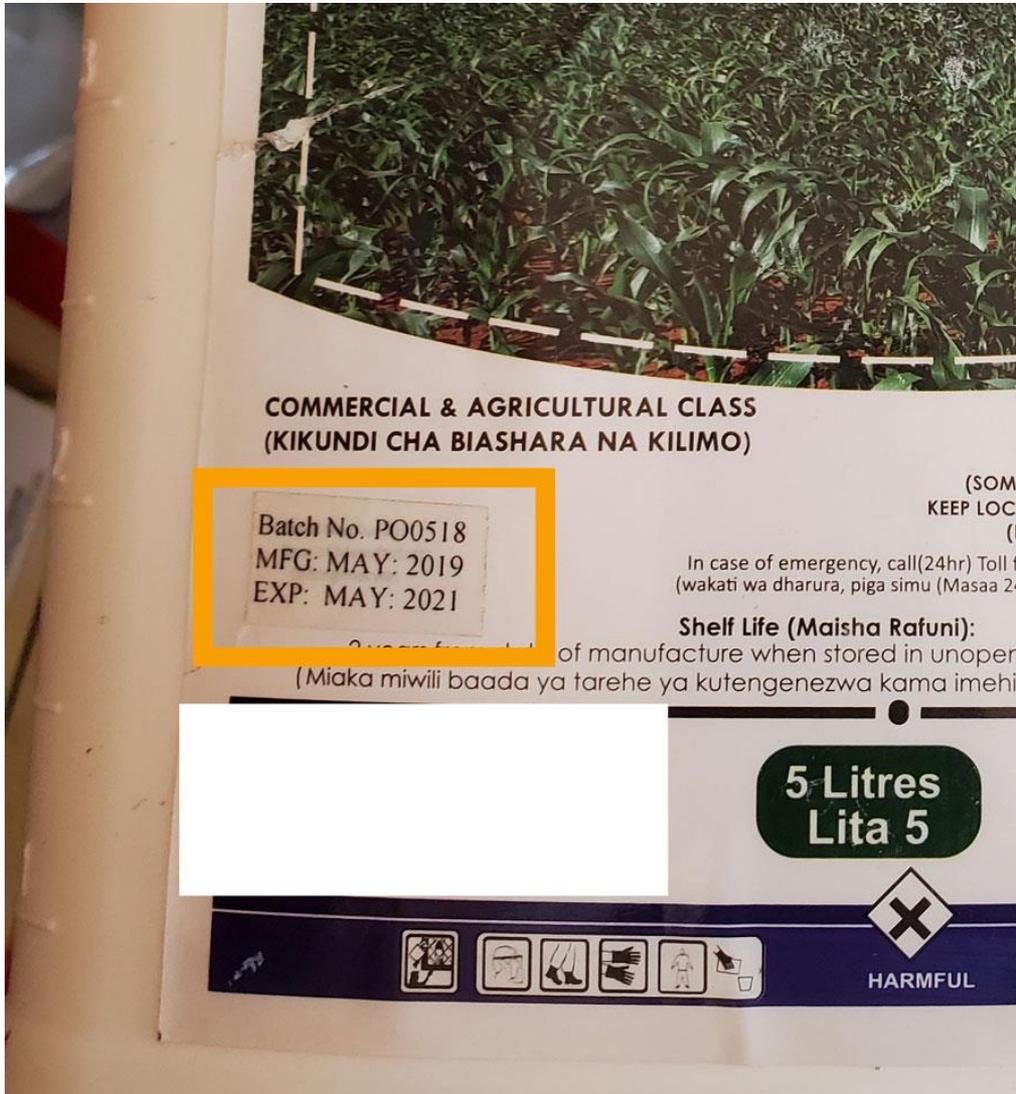


## Improperly repackaged products





## Example of sticker batched products

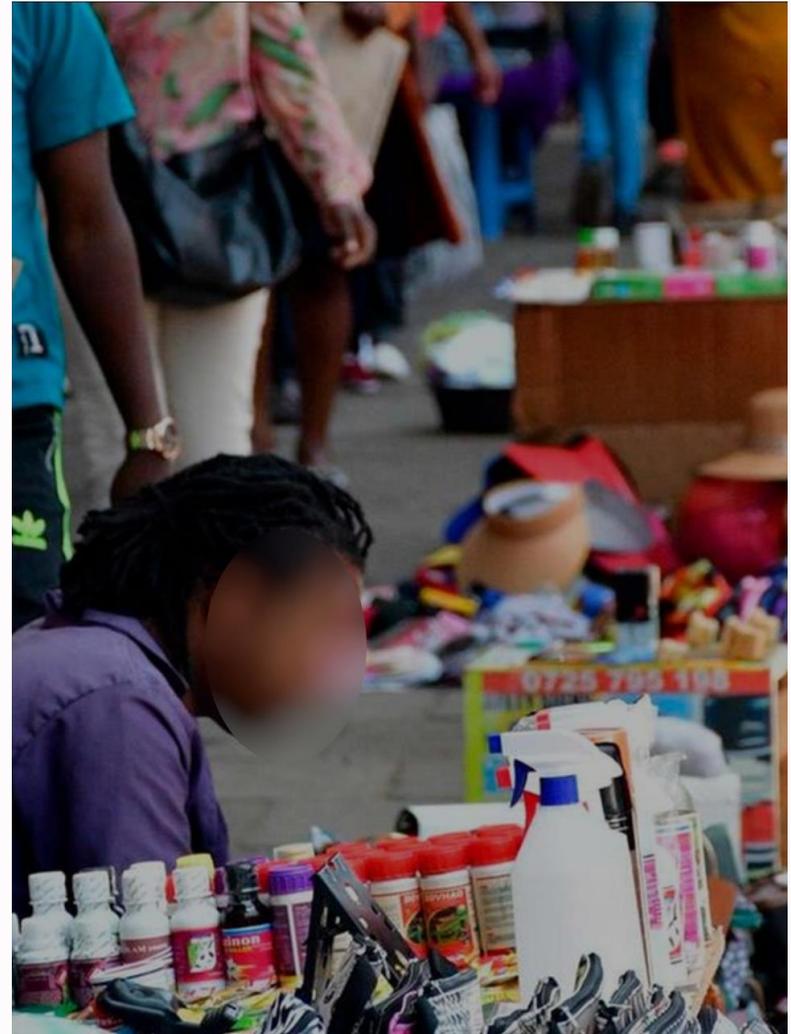




# Context: Kenyan Situation

## Challenges:

- Smuggling across porous borders
- Hawkers & informal outlets (mali mali)
- Traveling sales persons (on boda bodas & vans)
- Unregulated online sales





# Key Entry Pathways for Illegal Pesticides

- Porous borders
- Concealed in cargo
- Mis-declared imports
- Locally formulated





# DANGERS OF ILLEGAL PRODUCTS

- Unregistered, smuggled & counterfeit products often contain harmful unknown, undeclared or unapproved active ingredients that are a risk to food safety.
- Illegal products may lead to high operator exposure due to harmful ingredients and lack of proper usage instructions.
- Illegal products may lead to crop losses due to lack of efficacy or due to phytotoxicity.
- Unapproved use of pesticides leads to the risk of residues in food which can harm human health.
- Decanting & reweighing of products at retail level can lead to exposure of the handlers & compromises the efficacy of the products.
- Poor disposal of obsolete pesticides can lead to environmental contamination e.g. contamination of ground water.
- MRL exceedance leads to interceptions & loss of export markets leading to loss of income for the country & farmers.





# Strategies to Combat Illegal Pesticides

## Strengthen Border Control

- Presence at more border points
- Risk based inspections
- Collaboration between import control agencies
- Joint patrols in unmanned border sections
- Sensitization of trans-boundary transport & logistics companies on illegal pesticides
- Long term goal: Harmonization of standards in the region





# Strategies to Combat Illegal Pesticides

## Enhance Enforcement

- Joint multi-agency operations
- Coordinated raids
- Intelligence sharing
- Stronger penalties
- Publicize arrests & prosecutions
- Legal action against growers who use illegal pesticides





# Strategies to Combat Illegal Pesticides

## Market Surveillance

- Frequent inspections of agro-dealers
- Monitoring of products
- Sampling of products for quality
- Seizure of illegal stocks





# Strategies to Combat Illegal Pesticides

## Digital Monitoring

- Track online sales
- Issue takedown notices for illegal product adverts
- Collaborate with the Communications authority to clamp down on errant online vendors
- Trace supply chains to physical stores & conduct raids
- Engage couriers & delivery agents





# Strategies to Combat Illegal Pesticides

## Awareness Creation

- Farmer education
- Training extension staff
- Training Spray Service Providers
- Agro-dealer training
- Public campaigns e.g. vernacular radio
- Roadshows
- Digital awareness creation on social media





# Strategies to Combat Illegal Pesticides

## Capacity Building

- Train pesticide inspectors
- Sensitize partner import control agencies
- Train county inspectorate staff on how to combat illicit pesticide trade
- Sensitize judiciary & prosecutors on the provisions of the relevant laws relating to illegal pesticides





# Strategies to Combat Illegal Pesticides

## Regional Cooperation

- Cross-border operations
- Sharing intelligence
- Benchmarking
- Harmonize regulations





**THANK YOU**

# OUR CONTACTS

## PEST CONTROL PRODUCTS BOARD

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Nairobi, Kenya

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Website: [www.pcpb.go.ke](http://www.pcpb.go.ke)

Tel: +254-20-8021846/7/8

0720 480 904

Regional offices- Nairobi, Coast, Western, Mt. Kenya, South Rift & North Rift



# Countering Illegal Pesticides: Global Best Practices on Industry Collaboration, Enforcement Partnerships and Emerging Risks

---

Marie Goh Chooi Fong, CropLife Asia

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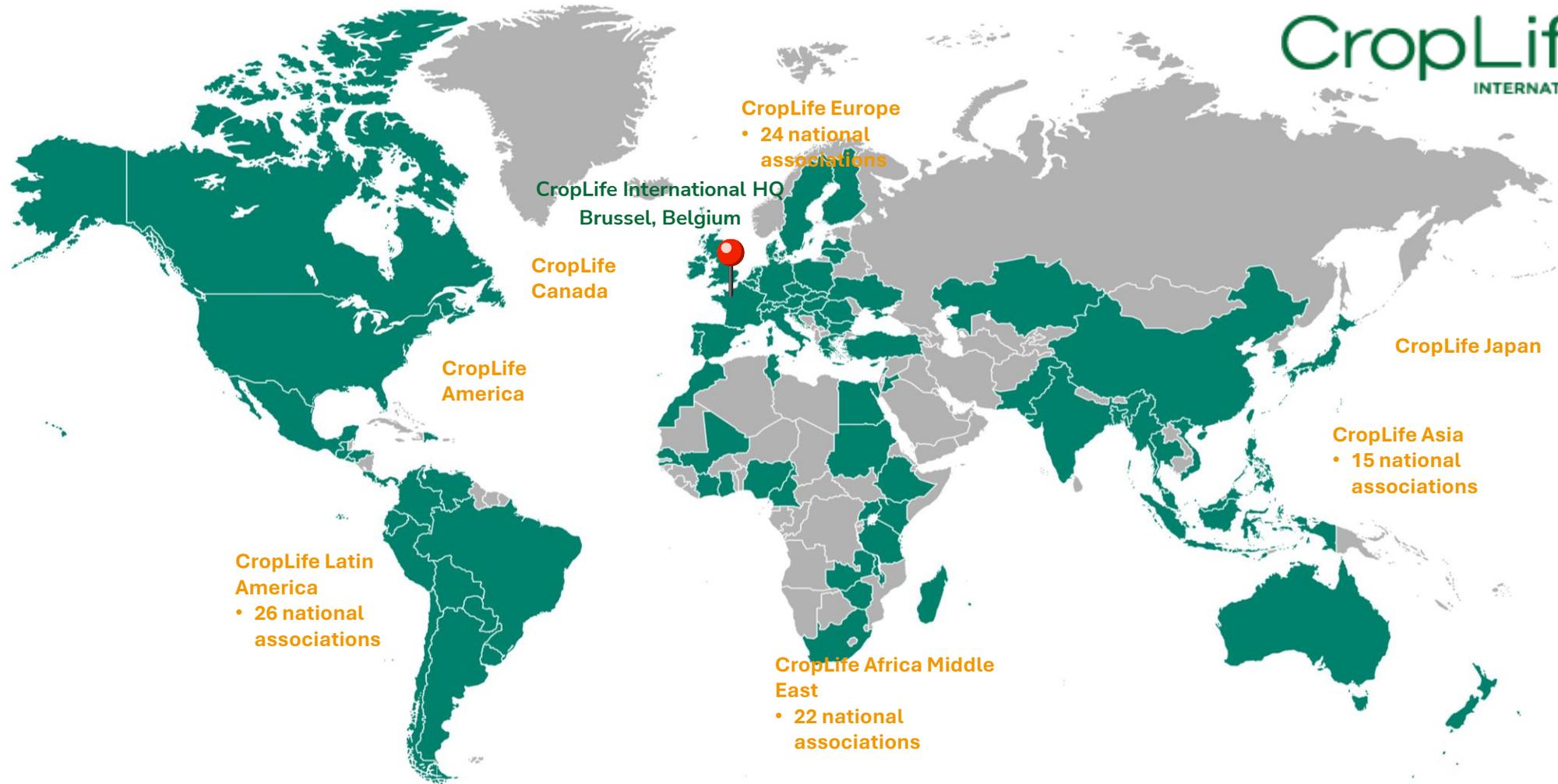
# Topics

- Who we are
- Illicit Trade
- Global best practices & Enforcement partnerships
- Illicit trade on online platforms

# Who We Are

# CropLife International - Crop Protection and Plant Biotechnology

## 94 National & Regional Associations



# CropLife Asia network-supporting a safe, secure and sustainable food supply in Asia through plant science



6 Members Companies

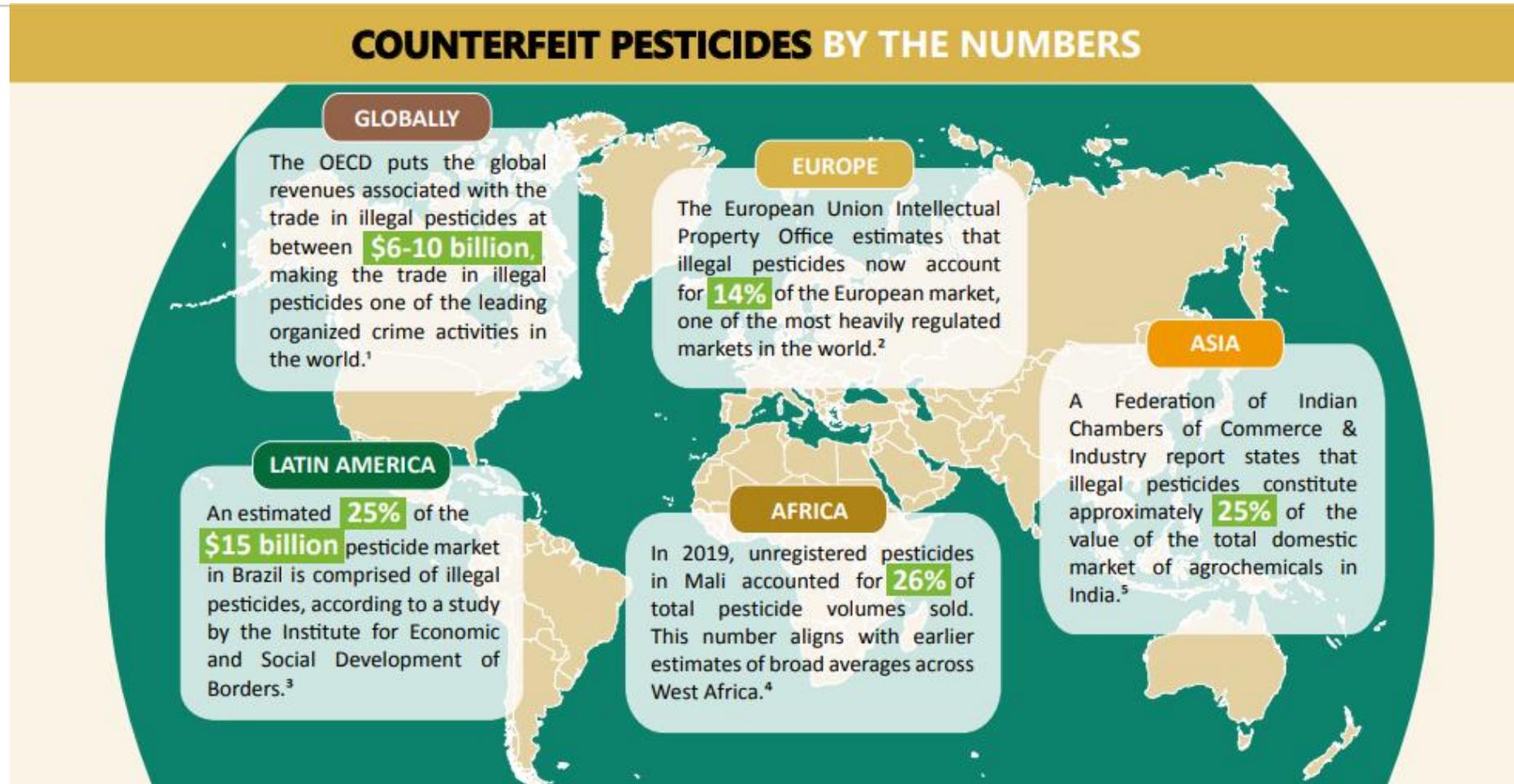


15 National Association



# Illicit Trade

# Illicit Trade Remains a Global Concern



1. OECD, Joint Working Party on Trade and Environment: New digital technologies to tackle trade in illegal pesticides, 2020, p. 12.

2. EUIPO-EUROPOL, Intellectual Property Crime Threat Assessment, 2022, p. 20.

3. IDESF, The Illegal Market for Agricultural Pesticides in Brazil, 2021, p. 49.

4. Agricultural Economics, Unregistered pesticides: Prevalence, risks, and responses in Mali, 2023, p. 6.

5. FICCI, Study on Sub-Standard, Spurious/Counterfeit Pesticides in India 2015 - Report, 2015, p. 17.

6. Reuters, Brazil set to seize massive volumes of illegal pesticides this year, says govt official, 25 August 2022.



# Risks of Non-Registered Products

Critical impacts of illicit pesticides on health, environment, and economy



## Human Health Hazards

**Unknown Toxicity:** Illegal products often contain untested active ingredients or banned substances (e.g., POPs).

**Acute Poisoning:** Higher risk for farmers due to lack of proper safety instructions and protective equipment guidelines.

**Chronic Effects:** Long-term exposure to unknown co-formulants can lead to severe health issues.

**IMPACT: CRITICAL - Life Threatening**



## Economic Losses

**Crop Failure:** Ineffective fake pesticides lead to total harvest loss for farmers.

**Market Rejection:** Export crops rejected due to illegal residues, causing massive financial losses.

**Unfair Competition:** Legitimate manufacturers face price undercutting from tax-evading illicit sellers.

**IMPACT: HIGH - Financial Ruin**



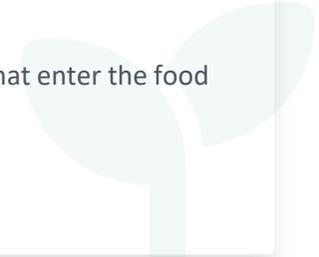
## Environmental Contamination

**Soil & Water Pollution:** Unregistered chemicals persist in the environment, contaminating groundwater and soil fertility.

**Biodiversity Harm:** Non-target species (bees, birds, aquatic life) are decimated by unregulated toxic compounds.

**Residue Accumulation:** Illegal pesticides leave persistent residues that enter the food chain.

**IMPACT: CRITICAL - Irreversible Damage**



## Public Trust & Food Safety

**Consumer Confidence:** Scandals involving contaminated food erode trust in agricultural systems.

**Regulatory Failure Perception:** Widespread availability of illegal goods undermines authority credibility.

**Food Security Threat:** Compromised crop yields threaten national food supply stability.

**IMPACT: HIGH - Systemic Risk**



# Pesticides Require Special Regulation

Comparison of regulatory frameworks: Crop Protection (Pesticides) vs. Pharmaceuticals

Regulatory Area	Crop Protection (Pesticides)	Pharmaceuticals
 <b>Pre-Market Authorization</b>	<p>✓ Mandatory National Registration Based on efficacy &amp; safety data (human/env risk)</p>	<p>✓ Mandatory Market Authorization Based on clinical trials (safety/efficacy)</p>
 <b>Seller Requirements</b>	<p>✓ Licensed Dealers Only Must meet storage &amp; handling standards</p>	<p>✓ Licensed Pharmacies Only Pharmacist oversight required</p>
 <b>End-User Controls</b>	<p>✓ Certified Applicators Required for Restricted Use Pesticides (RUPs)</p>	<p>✓ Medical Prescription Required for prescription-only medicines</p>
 <b>Safety Communication</b>	<p>✓ Strict Labeling (GHS) Detailed SDS &amp; use instructions required</p>	<p>✓ Strict Labeling &amp; Leaflets Patient information leaflets &amp; dosage guides</p>
 <b>Supply Chain Control</b>	<p>✓ Lifecycle Stewardship Transport (UN TDG) &amp; Disposal regulations</p>	<p>✓ Serialization &amp; Traceability Good Distribution Practice (GDP)</p>

# Global Best Practices

# Operation Silver Axe

## Total of 6961 tonnes of illegal pesticides seized since Silver Axe I

Silver Axe I	2015	<u>190 tonnes of counterfeit pesticides seized</u>
Silver Axe II	2017	<u>122 tons of illegal or counterfeit pesticides seized during operation Silver Axe II</u>
Silver Axe III	2018	<u>360 tons of smuggled pesticides were seized</u>
Silver Axe IV	2020	<u>346 tonnes of illegal pesticides taken off the market in 2020 global operation Silver Axe</u>
Silver Axe V	2020	<u>Seized over 550 tonnes of illegal pesticides</u>
Silver Axe VI	2021	<u>€ 80 million in criminal profits seized during operation Silver Axe VI.</u> 12 arrests and the seizure of over 1200 tonnes of illegal pesticides in total.
Silver Axe VII	2022	1,150 tonnes of pesticides were seized in total, a factory producing fake pesticides was dismantled, and ten people were arrested
<b>Silver Axe VIII</b>	<b>2023</b>	<b>Seizure of 2040 tons of illegal pesticides and the arrests of 21 suspects.</b>



[https://anti-fraud.ec.europa.eu/media-corner/news/operation-against-fake-pesticides-over-1000-tonnes-stopped-factory-dismantled-2022-07-26\\_en](https://anti-fraud.ec.europa.eu/media-corner/news/operation-against-fake-pesticides-over-1000-tonnes-stopped-factory-dismantled-2022-07-26_en)

# Our Partnerships and Contributions



**ILLICIT PESTICIDES,  
ORGANIZED CRIME  
AND SUPPLY CHAIN INTEGRITY**



[https://unicri.org/sites/default/files/2019-10/The\\_problem\\_of\\_illicit\\_pesticides.pdf](https://unicri.org/sites/default/files/2019-10/The_problem_of_illicit_pesticides.pdf)

[https://www.tracit.org/uploads/1/0/2/2/102238034/tracit\\_aseancommunity\\_june2023.pdf](https://www.tracit.org/uploads/1/0/2/2/102238034/tracit_aseancommunity_june2023.pdf)

# Education & Advocacy across the regions e.g. Asia

## Don't put your farm at risk with illegal agricultural chemicals

The global trade in illegal pesticides is growing and Australia is at risk.

Illegal pesticides can endanger human health, the environment and the economy.

They also put Australian farming at risk.



Go straight to the source at [stewardshipfirst.com.au](http://stewardshipfirst.com.au)

Do right by your farm, your local community and Australian agriculture:

- ⚠️ Only buy products from reputable stores or distributors
- ⚠️ Avoid internet or email deals from unknown suppliers
- ⚠️ Always buy products with instructions written in English
- ⚠️ Check the product has a proper registration label with an APVMA approval number

To ensure you are buying legitimate, lawful and quality crop protection products, look to CropLife Member Companies:



CropLife Australia  
Representing the best of the plant science industry



**Mai, Uttar Pradesh, India**  
6qgr+hm8, Mai, Uttar Pradesh 283101, India  
Lat 27.226451° Long 77.91869°  
23/08/2025 03:50 PM GMT +05:30



**Agra, Uttar Pradesh, India**  
5wvf+mm9, Manghatai, Agra, Uttar Pradesh 282007, India  
Lat 27.18652° Long 77.92443°  
20/08/2025 03:09 PM GMT +05:30

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โทรศัพท์: 02-940-5434, 02-940-6670

CropLife MALAYSIA

**马来西亚植保与公共卫生协会**

No.11, 1st Floor, Jalan SS26/8, Taman Mayang Jaya, 47301 Petaling Jaya, Selangor D.E, Malaysia  
电话: +603-7804 8968 传真: +603-7804 8964 电邮: [admin@mcpea.org.my](mailto:admin@mcpea.org.my) 网站: <http://www.mcpea.org.my>

**3 问题** 购买农药时要提问以下三个问题

农民: 注意! 不要购买非法或没有注册的农药 - 它们会毁掉您的作物

农民在购买农药时, 一定要提问这三个问题, 以保证农药合法正品。

<b>1</b>	<b>2</b>	<b>3</b>
这是正品吗?	是谁制造的?	这是合法注册的吗?
Q: 有什么证据证明这个农药是合法和正品的?	Q: 谁注册这个农药, 农民如何联系注册商?	Q: 这个农药是经过农商局批准的吗? 你有什么证据?
A: BKRPB批准的正确标签: 授权经销商/零售商: 高品质的包装; 二维码/条码	A: 请参考标签或参阅 DOA网站中的列表	A: 参考标签上的 LRMPR/XXXX 编号; 请参阅DOA网站中的列表 LRMPR/XXXX

如有任何非法和没有注册农药的问题, 请联系农业部农药执法单位



# Illicit Trade on Online Platforms



### Glyphosate 71% SG Herbicide, 50 Kg, Drum

₹ 350/ Kg

Usage: Agricultural

Dosage: 150g per Acre

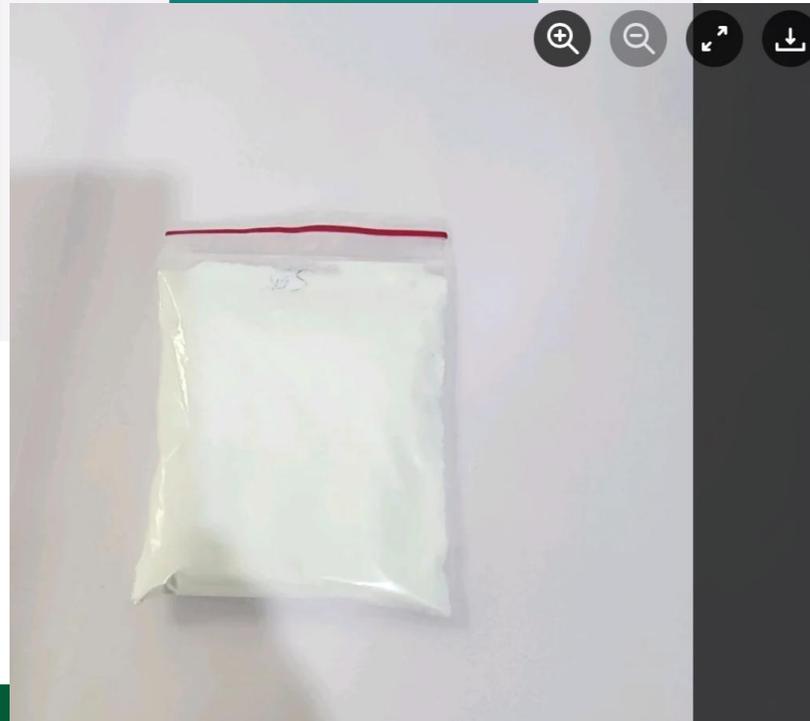
Target Weed Species: Trianthamamonogyna,...

**Sold By** - Eagle Life Science, Rajkot, Gujarat

TrustSEAL Verified

+91 | Enter your mobile

Your Country is **India**



### Powder Glyphosate Technical Chemical, 50 kg

₹ 600/ Kg

Shelf Life: 2 Years

Formulation: Technical

Packaging Type: HDPE Bag

**Sold By** - Greenwell Biotech, Gondal, Gujarat

Leading Supplier TrustSEAL Verified

+91 | Enter your mobile

Your Country is **India**

Contact Supplier

# Collaboration on Illicit Trade Online Sales of Pesticides



## TACKLING THE SALE OF ILLICIT PESTICIDES ON E-COMMERCE PLATFORMS

RISKS, CHALLENGES AND SOLUTIONS

TRACIT.ORG



United States  
Environmental Protection  
Agency

Office of Enforcement  
& Compliance Assurance  
Washington, DC 20460

March 2004

## Fact Sheet on Pesticides Sales in E-Commerce

Internet-based pesticide marketing is a new and evolving medium for pesticide sales and distribution. All types of pesticides are sold through the internet, including conventional use and antimicrobial pesticides. U.S. EPA is working closely with the states through the Association of American Pesticide Control Officials (AAPCO) to develop an informed and nationally consistent approach to pesticide electronic commerce activities, including agricultural use pesticides.

### What is a pesticide?

A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest or intended for use as a plant regulator, defoliant, or desiccant. The substances listed below are all examples of pesticides.

- Cockroach sprays and baits
- Flea and tick sprays, powders, collars and wrist bands
- Hospital disinfectants
- Industrial Chemicals
- Insect control chalk (a/k/a Chinese chalk)
- Insect repellants
- Kitchen, laundry, and bath disinfectants and sanitizers
- Lawn and garden products that kill weeds, insects, or plant diseases
- Plant protection chemicals that kill weeds, insects, or plant diseases
- Products that kill or control mold or mildew
- Rat, mouse, and other rodent poisons
- Some swimming pool chemicals

### Why is the U.S. EPA concerned about pesticide sales over the internet?

Pesticides are poisons designed to control specific organisms. Handling of pesticides according to U.S. EPA and state registration and labeling requirements ensures that exposure to these products is minimized. However, a misused or mishandled pesticide may be harmful to humans, other organisms, and the environment. The anonymity and remoteness of the parties involved in internet sales increases the inherent risk involved with the handling or use of pesticides when they are purchased over the internet and shipped.

### What laws apply if you sell pesticides over the internet?

Many different types of pesticides are offered for sale over the internet. Both federal and state pesticide laws and regulations apply to these sales. Relevant federal requirements are listed below.

- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 7 U.S.C. §§135 *et seq.*
- Federal Food, Drug, and Cosmetic Act (FFDCA) 21 U.S.C. §§301 *et seq.*
- 40 Code of Federal Regulations Parts 150 to 189
- 49 Code of Federal Regulations Parts 100 to 185
- 19 Code of Federal Regulations §§12.110 to 12.117

No person in any state may distribute, sell, or offer for sale or distribution to any person any pesticide that is not registered in accordance with §3 of FIFRA. Generally, it is the **seller's**

Page 1

The **FAO–WHO Joint Meeting on Pesticides Management (JMPPM)** has created guidance to help countries, especially **low- and middle-income nations** to establish a **national framework for safe and sustainable online pesticide sales**. The document stresses the need to **strengthen laws, regulations, and public awareness** to address challenges such as **anonymous sellers, rapidly changing websites, and cross-border illegal trade**.

Key recommendations include:

- **Updating national pesticide legislation** to cover online sales, licensing of sellers, and transport regulations.
- Ensuring **accurate information and standardized labelling** across countries.
- Developing **reporting systems** for pesticide incidents via online platforms.
- Providing **training** for those handling or transporting pesticides.
- Equipping regulatory agencies with **resources, trained inspectors, and cross-border cooperation mechanisms**.
- The guidance promotes **international collaboration, information sharing, and locally adapted solutions** to protect public health and support **sustainable agriculture**.

Source: <https://openknowledge.fao.org/handle/20.500.14283/cd5477en>



## International Code of Conduct on Pesticide Management

### Guidance note on online sales of pesticides



# Regulatory Framework for Pesticide Sales

FAO/WHO Guidelines 2025

Comprehensive lifecycle controls extended to digital commerce



## Registration

Country of Use Principle: Must be registered in destination country destination country

Scientific assessment of efficacy & safety

Pre-market authorization requirement

Extended to Online Listings



## Licensing

Mandatory for dealers, distributors & retail

Storage facility certification

Training requirements for personnel

Digital Seller Verification



## Packaging & Labeling

GHS Compliance: Hazard pictograms

Local language requirement (destination)

Safety Data Sheets (SDS) provision

Digital Label Display



## Transport Safety

UN TDG Recommendations: Dangerous goods rules

Separation from food/consumer goods

Spill containment protocols

Parcel/Courier Compliance



## International Treaties

Rotterdam Convention: Prior Informed Consent (PIC)

Stockholm Convention: POPs restrictions

Cross-border trade notifications

Cross-Border E-commerce



## Online Channel Specifics

Platform accountability & due diligence

Real-time license verification

Prohibition of high-risk product sales

New FAO/WHO 2025 Guidance

# Enforcement Authority & Powers Needed

Essential Regulatory Capabilities for Online Pesticide Control



## Lead Authority

Designated National Regulator (e.g., CIB/RC, EPA, Ministry of Agriculture)

- ✓ Centralized Mandate
- ✓ Online Jurisdiction
- ✓ Inter-agency Lead

## ⚡ CRITICAL DIGITAL ENFORCEMENT POWERS

### Seizure & Stop-Sale

Physical seizure in warehouses & digital stop-sale orders for listings

### Takedowns & Blocking

Order removal of listings and blocking of non-compliant domains/URLs

### Mystery Shopping

Authority to make test purchases anonymously to verify compliance

### Data Compulsion

Access to platform KYC data, transaction logs, logs, and seller identities

### Fast-Track Adjudication

Expedited administrative procedures for digital violations

### Safe Disposal

Protocols for environmentally safe destruction of seized goods

## 🤝 COLLABORATION ECOSYSTEM



### Payment Processors

Block Transactions



### Couriers / Logistics

Intercept Parcels



### Hosting Providers

Remove Content



### Customs & Police

Cross-border Intel

# Platform Responsibilities

Core pillars for safe and compliant agrochemical e-commerce

## VERIFICATION



### Seller Identity & KYC

Mandatory vetting of seller credentials before allowing access to agrochemical categories. Ensure traceability to legal entities.

- ✓ Real-identity verification
- ✓ Business license capture
- ✓ Geolocation checks

## PREVENTION



### Listing Controls

Technical barriers to prevent non-compliant listings from going live. Automated validation of product data fields.

- ✓ Category gating (Restricted)
- ✓ Mandatory Reg. ID fields
- ✓ Prohibited keyword filters

## DETECTION



### AI & Smart Monitoring

Deploying machine learning models to scan active listings for suspicious patterns, image discrepancies, and evasion tactics.

- ✓ Image/Text matching models
- ✓ Risk scoring algorithms
- ✓ Repeat offender detection

## ENFORCEMENT



### Response Protocol

Standardized procedures for handling takedown requests and violations. Rapid action to minimize exposure time.

- ✓ 24-48h Takedown SLA
- ✓ Clear appeals workflow
- ✓ Seasonal proactive sweeps

## CONTROL



### Geo-Fencing Sales

Restricting product visibility and purchase availability based on buyer location and local registration status.

- ✓ Location-based visibility
- ✓ Shipping restrictions
- ✓ Cross-border blocking

## COLLABORATION



### Data Sharing

Secure exchange of information with regulators to support investigations and improve overall market safety.

- ✓ Secure Regulator APIs
- ✓ Preservation of evidence
- ✓ Transparency reports

# New Updates - China

## New China Pesticide E-Commerce Regulations - Effective January 1, 2026

China's Ministry of Agriculture and Rural Affairs has issued comprehensive e-commerce regulations (Document No. Nongban Nong [2025] No. 22) that mandate strict licensing, filing, and disclosure requirements for all online pesticide sellers. The regulations aim to combat illicit pesticide trade through enhanced traceability and platform accountability

### CRITICAL REGULATORY CHANGES

1. Mandatory Licensing & Filing
  - All online pesticide sellers must obtain a Pesticide Business License before operation
  - Mandatory filing with authorities within 20 days of going online
  - Transition deadline: January 31, 2026 for existing operators
2. Complete Online Sales Ban for High-Risk Products
  - Restricted-use pesticides are completely prohibited from online sales
  - Violators treated as unlicensed operators, subject to severe penalties
3. Enhanced Transparency Requirements
  - Prominent display of license information on all sales pages
  - Complete, accurate product label information must be shown
  - License changes must be updated within 10 working days
4. Platform Accountability
  - Third-party e-commerce platforms must verify seller qualifications
  - Mandatory real-name purchase systems
  - Transaction record preservation requirements
  - Active cooperation with regulatory enforcement

Source: - [https://mp.weixin.qq.com/s/O\\_Kh5dD6HQ1\\_0VINyazOqA](https://mp.weixin.qq.com/s/O_Kh5dD6HQ1_0VINyazOqA)

### IMPLICATIONS FOR ANTI-ILLCIT TRADE EFFORTS

Opportunities:

- ✓ Enhanced traceability through mandatory filing and real-name purchases
- ✓ Platform cooperation requirements facilitate enforcement coordination
- ✓ Public license display enables easier identification of unlicensed operators
- ✓ Clear prohibition on restricted pesticides reduces high-risk product circulation

### PENALTY FRAMEWORK SUMMARY

Violation Type	Penalty Range
Failure to file	\$690-\$6,900 + correction order
No license display	E-Commerce Law Article 76 penalties
False product info	Up to \$1,380 (aggravated cases)
Platform non-compliance	E-Commerce Law Article 80 penalties
Selling restricted products online	Unlicensed operation penalties

*Exchange rate: 1 USD = 7.25 RMB (approximate)*

### KEY DATES

- **January 1, 2026:** Regulations take effect
- **January 31, 2026:** Filing deadline for existing operators
- **Ongoing:** Quarterly enforcement reporting expected

# New Updates - Vietnam

## Vietnam's E-Commerce Law - Effective July 1, 2026

On December 10, 2025, the National Assembly adopted the law on E-commerce with 444 out of 446 deputies present voting in favor.

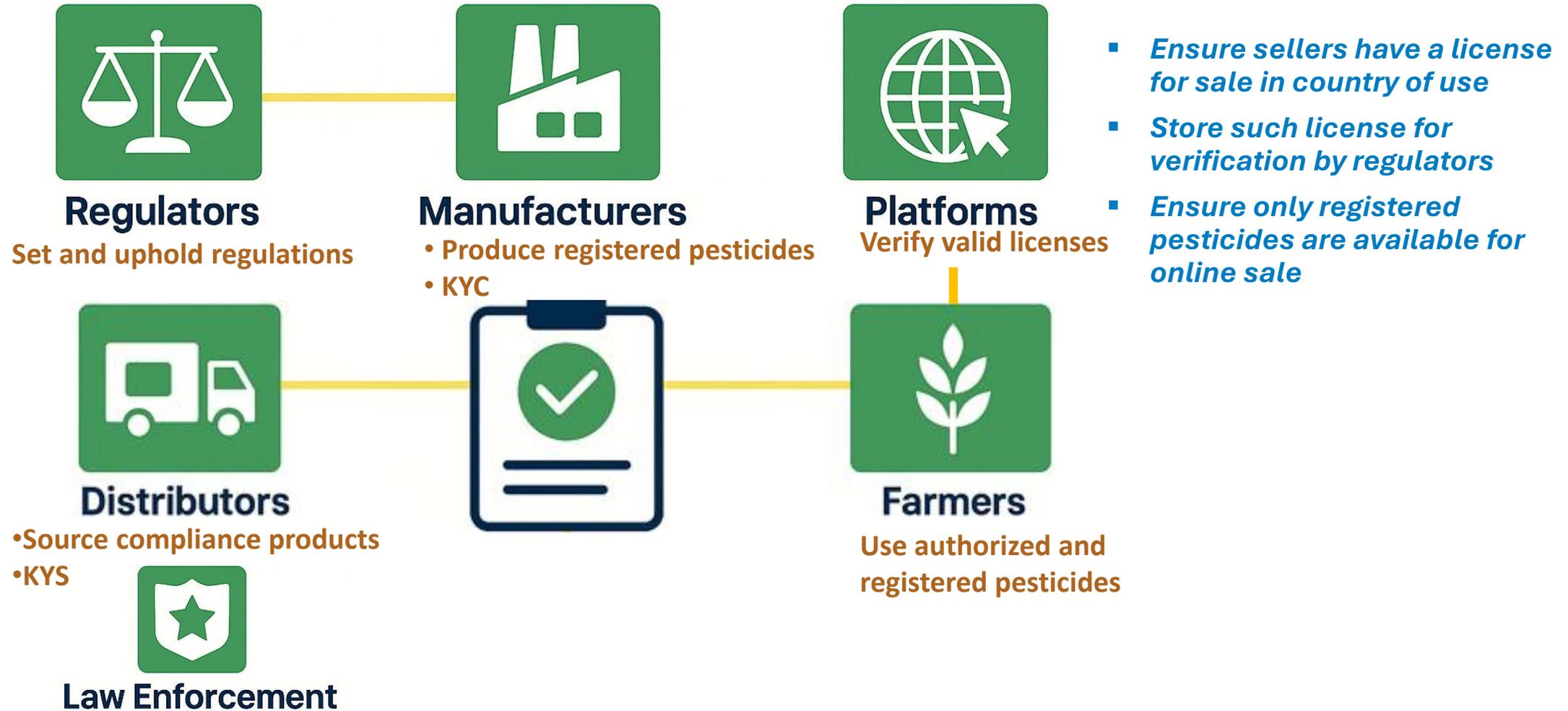
- Clarifying obligations for social media e-commerce and livestreamed sales
- Strengthening seller identification and market transparency
- Responsibilities of foreign platforms operating in Vietnam
- Ensuring timely issuance of implementing regulations
- Addressing detailed recommendations from deputies - (1) transaction thresholds for foreign platforms; (2) deposit requirements for certain foreign platforms to guarantee compensation for consumers and fulfil financial obligations to the State; (3) reporting mechanisms; (4) administrative procedures and (5) violation handling and policies promoting e-commerce development.

### Scope and entry into force

- The Law on E-commerce comprises 7 chapters and 41 articles. It provides regulations on e-commerce development policies; e-commerce platforms and responsibilities of organisations and individuals participating in e-commerce; cross-border e-commerce; responsibilities of entities providing supporting services; and the application of technology in enforcement and violation handling.
- The law applies to **both domestic and foreign organisations and individuals** engaged in e-commerce activities in Vietnam and will **take effect on July 1, 2026**.

Source: - <https://moit.gov.vn/en/news/latest-news/the-national-assembly-officially-passes-the-e-commerce-law.html#:~:text=The%20law%20applies%20to%20both,effect%20on%20July%201%2C%202026.>

# Call to Action - Tackling and reduce illicit pesticides









# AI and Intelligence Sharing- Lessons for Operations Against Illicit Pesticide Trade

Date: March 2026



# Illegal Pesticides: A Digital, Global Threat



Global networks



Online marketplaces  
(e-commerce, social  
media, dark web)



Multilingual operations



Fragmented intelligence

*Scale and complexity now exceed traditional enforcement capabilities.*

## AI Detection

- Scan online activity
- Keywords, images
- Risk scoring



## Intelligence Analysis

- Structure data
- Map networks
- Identify patterns



## Coordinated Action

- Share intelligence
- Support enforcement
- Target operations



# Scaling Enforcement Intelligence



**⚡ Faster detection**  
→ Earlier identification of illicit activity

**🎯 Risk-based prioritization**  
→ Focus on highest-impact cases

**🌐 Stronger global coordination**  
→ Shared intelligence across partners

**🚗 More effective enforcement**  
→ Targeted, data-driven operations



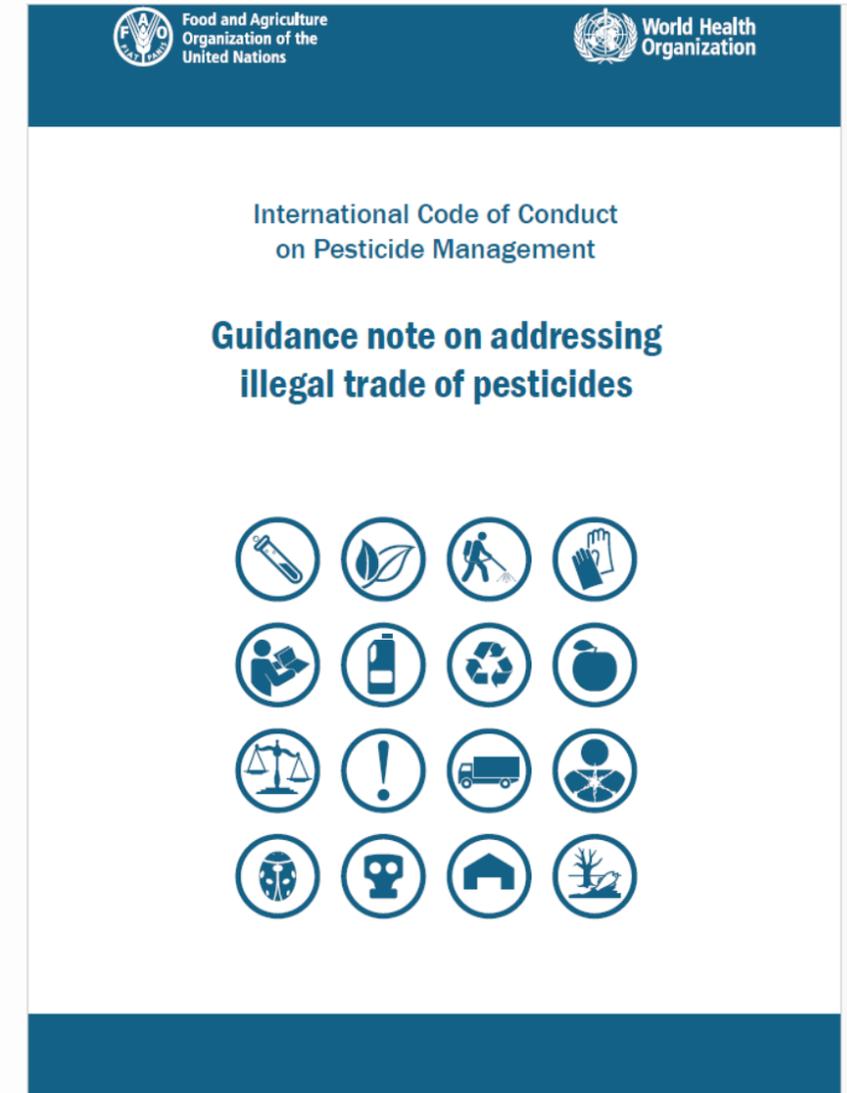




# FAO/WHO Guidance note on addressing illegal trade of pesticides

Oxana Perminova  
Agricultural Officer  
Plant Production and Protection Division (NSP), FAO

Carmen Bullon  
Legal Officer  
Development Law Service (FAO)



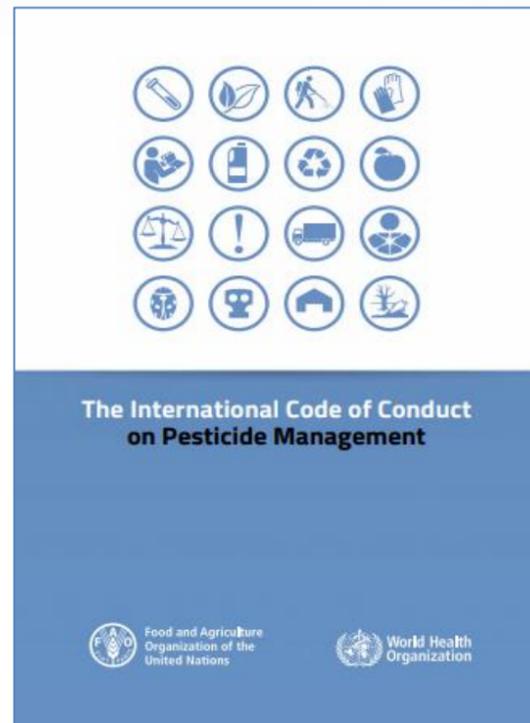
<https://openknowledge.fao.org/items/c68dc079-aa06-430e-a1df-0217451905e8>

# Addressing the Illegal Trade of Pesticides



## The Foundation

International Code of Conduct on Pesticide Management ensures global supervision over pesticide distribution and use.



<https://openknowledge.fao.org/server/api/core/bitstreams/4aa015cc-f644-4a1a-88dc-d0c2272fca05/content>

## The Technical Engine

The Guidance Note acts as the technical elaboration ensuring only approved, safe products reach the market.



<https://openknowledge.fao.org/items/c68dc079-aa06-430e-a1df-0217451905e8>

**Strategic Objective:** Strengthen legislative and regulatory frameworks to protect agriculture, public health, and the global environment.

# Lifecycle management approach

## Integrating all relevant aspects



# A Massive and Organized Threat to Global Security



## The Scope



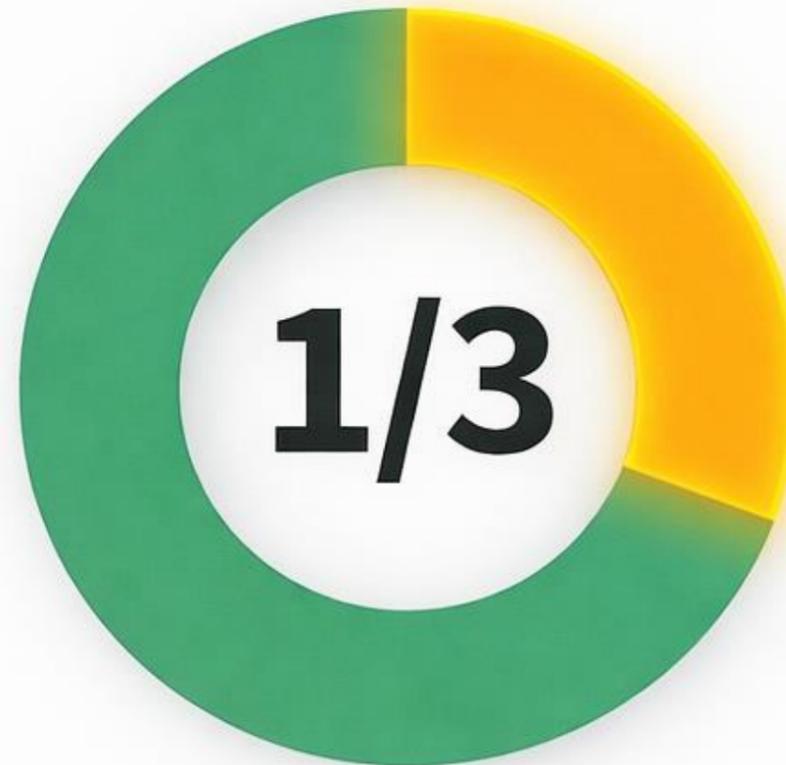
**Counterfeits & Fakes:**  
Fraudulent labeling and inactive/inappropriate ingredients.



**Unauthorized Imports:**  
Smuggling, disguising products, and splitting containers.



**Obsolete Substances:**  
Banned, degraded, or highly hazardous chemicals re-entering the supply chain.



Illegal products represent up to one-third of the market in heavily impacted regions.

## The Drivers

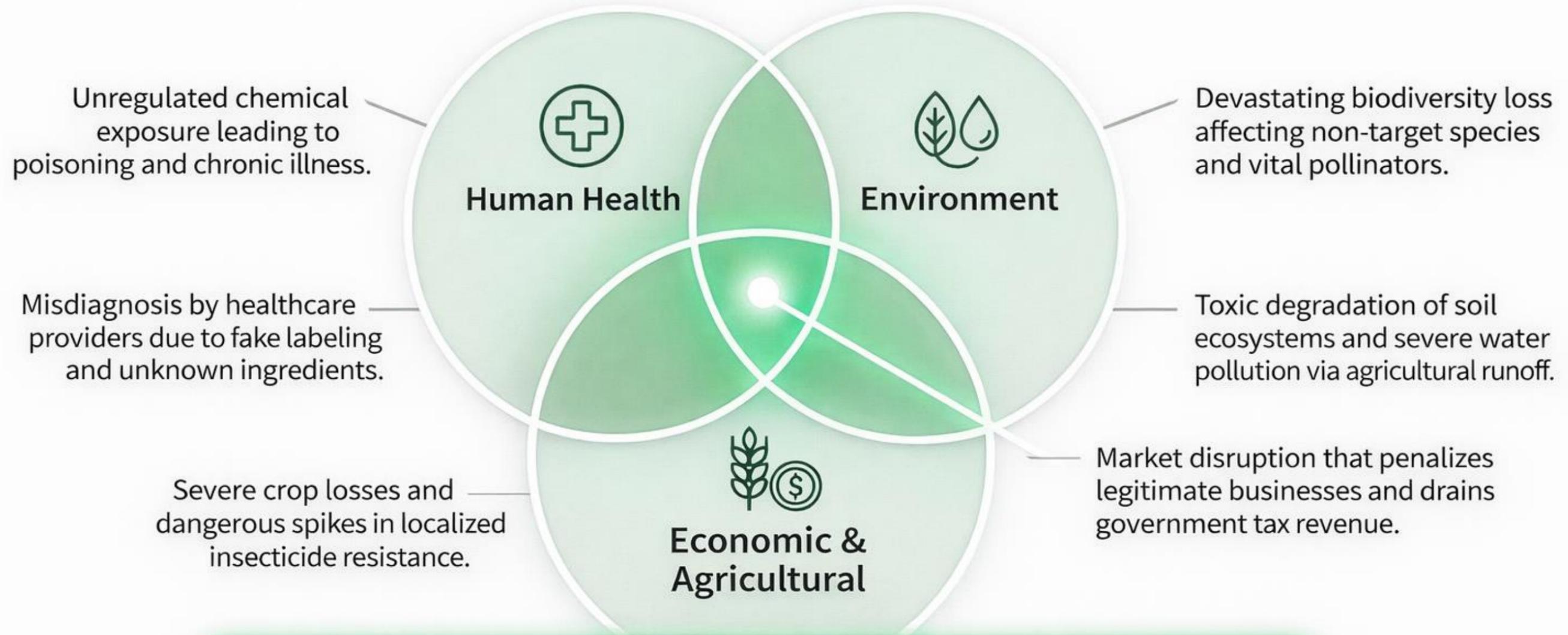


Driven primarily by transnational organized crime groups.



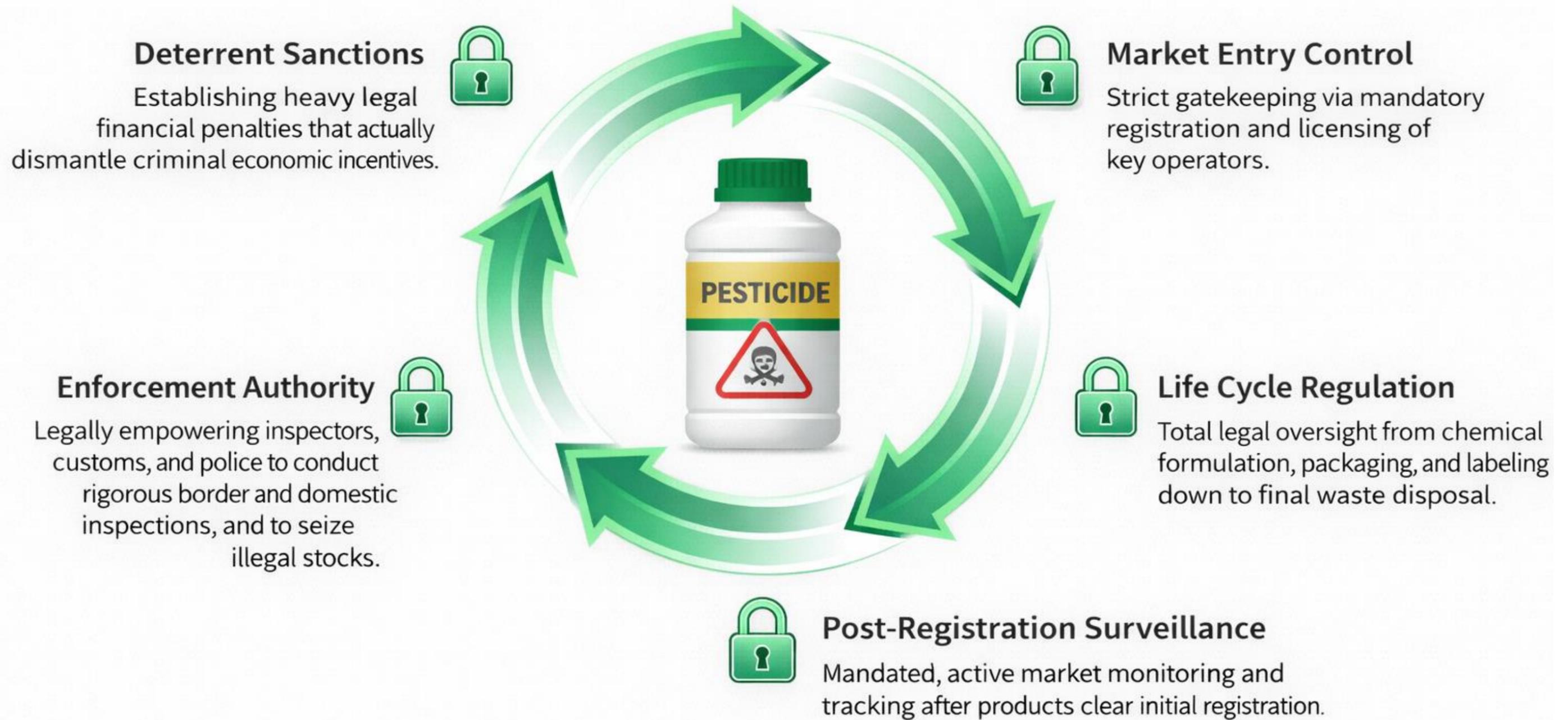
Exploitation of complex, multi-border global supply chains to falsify documents and bypass customs.

# An Interdependent Multisectoral One Health Challenge



**A unified system where the health of people, animals, and ecosystems cannot be separated from the integrity of the supply chain**

# Empowering Authorities Through Strong National Legal Frameworks



# Unified Strategies to Combat the Illegal Pesticide Trade



-  **Raise Public Awareness**  
Initiate educational campaigns on the dangers of illegal pesticides.
-  **Promote Responsible Trade**  
Encourage ethical practices among distributors and retailers.
-  **Strengthen International Cooperation**  
Foster global partnerships to track and eliminate the illegal trade.
-  **Modernize Regulatory Frameworks**  
Update and enhance national and regional pesticide regulations.
-  **Coordinate Enforcement Efforts**  
Synchronize law enforcement actions across borders to target criminals.
-  **Share Information**  
Exchange intelligence about illegal trade activities and trafficking routes.



**Thanks for your  
attention!**

**MORE FOOD LESS RISK**



Basel, Rotterdam and Stockholm Conventions

# An Overview of the Rotterdam PIC procedure

Lina Fortelius  
Programme Management Officer

Combating Illegal and Counterfeit Pesticides: Strengthening National Systems, Partnerships, and Trade Controls, 24 March 2026

# The Conventions

- ❑ **Basel Convention** on the Control of Transboundary Movements of hazardous wastes and their Disposal
  - ❑ 1989 / 191 Parties
- ❑ **Rotterdam Convention** on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade
  - ❑ 1998 / 168 Parties
- ❑ **Stockholm Convention** on Persistent Organic Pollutants
  - ❑ 2001 / 186 Parties



BASEL CONVENTION





ROTTERDAM  
CONVENTION

# What is the Rotterdam Convention?



Food and Agriculture  
Organization of the  
United Nations





# How does the Rotterdam Convention relate to other multilateral environmental agreements (MEAs) and frameworks on chemicals and waste?

Relevant legally-binding MEAs on chemicals and waste include:



Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Their Disposal



Minamata Convention on Mercury



Stockholm Convention on Persistent Organic Pollutants (POPs)



Global Framework on Chemicals (GFC)



# What is the objective of the Rotterdam Convention?

The objective is set out in Article 1:

To promote **shared responsibility and cooperative efforts** among Parties in the international trade of certain hazardous chemicals in order to **protect human health and the environment** from potential harm and to contribute to their environmentally sound use:

- by facilitating **information exchange** about their characteristics,
- by providing for a **national decision-making process on their import and export** and
- by **disseminating these decisions** to Parties.



The Rotterdam Convention does not recommend to ban or severely restrict the use of chemicals.



# What is the scope of the Convention?

The scope is set out in Article 3:

## ✓ Applies to

1. Banned or severely restricted chemicals; and
2. Severely hazardous pesticide formulations (SHPFs).



## ✗ Does not apply to

1. Narcotic drugs and psychotropic substances
2. Radioactive materials
3. Wastes
4. Chemical weapons
5. Pharmaceuticals, including human and veterinary drugs
6. Chemicals used as food additives
7. Food
8. Chemicals in quantities not likely to affect human health or the environment provided they are imported



# What is the Prior Informed Consent (PIC) procedure?



An integral part of the Rotterdam Convention.



Provides Parties with a means to assess risks and to decide whether they will allow future imports of Annex III chemicals.



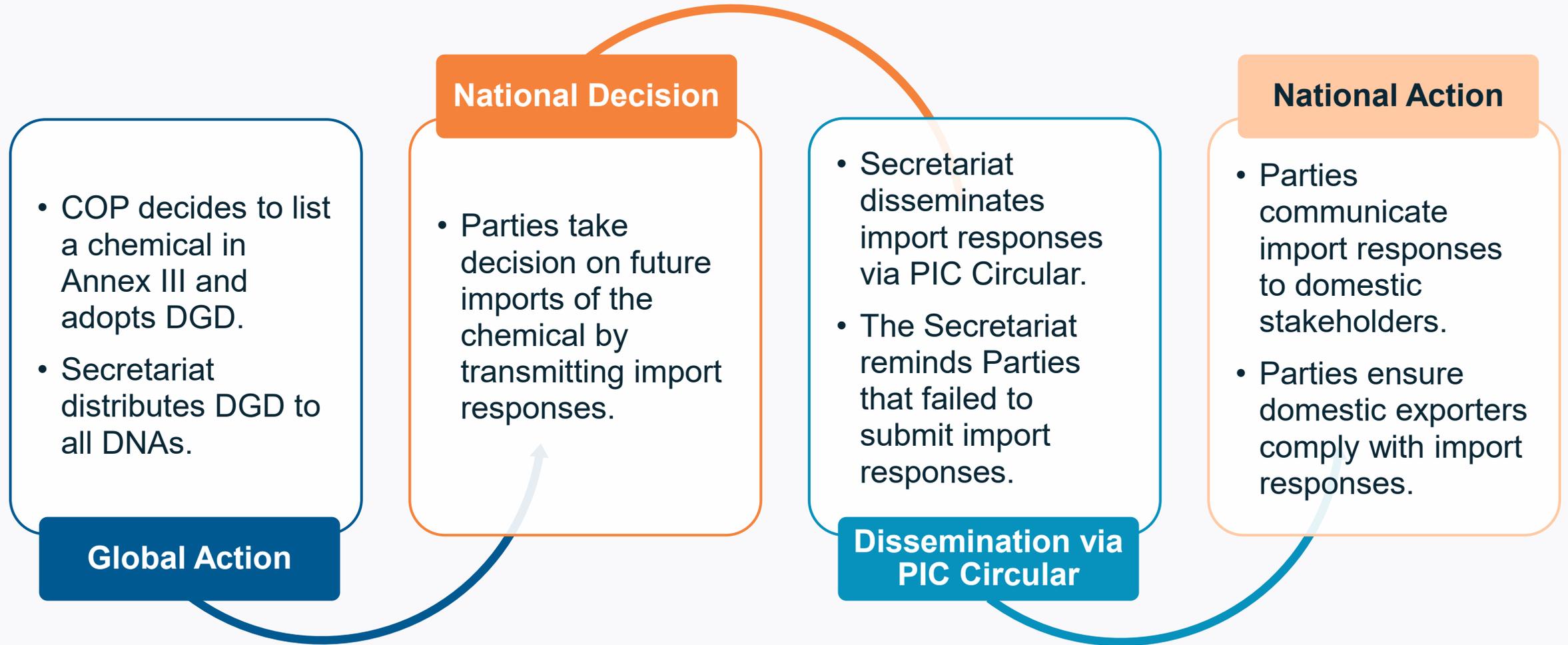
A means for formally obtaining and disseminating the decisions of Parties regarding future imports of these chemicals.

## In a nutshell:

- Exporting Parties are obliged to ensure that exports do not occur contrary to import responses.
- The PIC procedure thus ensures that [Annex III](#) chemicals are not exported without prior informed consent of the importing Party.



# Steps of the PIC procedure





# Key articles underpinning the PIC procedure

## Article 7: Listing of chemicals in Annex III

- Preparation, approval and dissemination of the decision guidance document (DGD).
- Process by which chemicals are approved by COP for listing in Annex III.

## Article 10: Obligations in relation to imports of chemicals listed in Annex III

- Parties to transmit import responses no later than 9 months after dispatch of DGD.
- Responses can consist of a final decision or an interim response.
- Parties can consent, not consent or consent only subject to specified conditions.

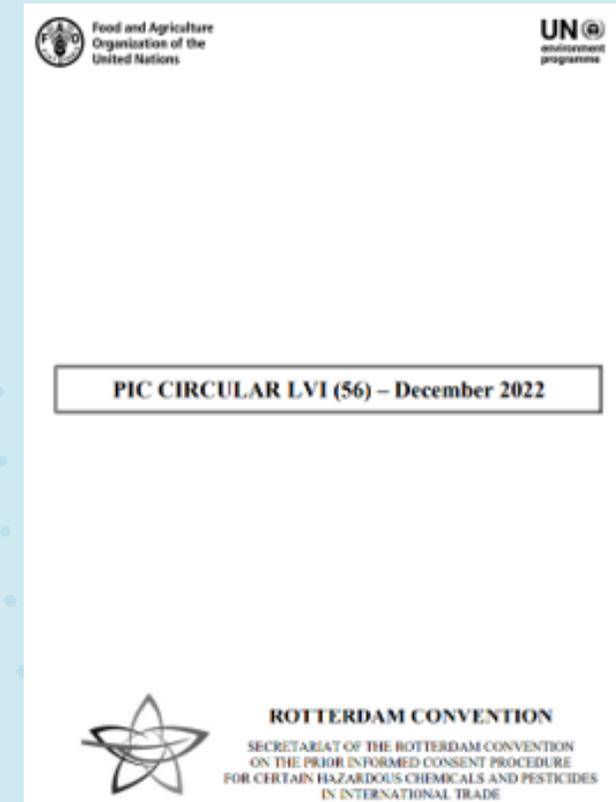
## Article 11: Obligations in relation to exports of chemicals listed in Annex III

- Exporting Parties to communicate import responses of other Parties to domestic stakeholders.
- Exporting Parties to ensure that domestic exporters comply with import responses of other Parties.

# Key documents for the PIC procedure: PIC Circular

## The PIC Circular:

- Key document: for the operation of the PIC procedure and exchange of information.
- Provides for information exchange (import responses, notifications of Final Regulatory Actions etc.)
- Published every six months (June and December).
- Used by Parties to inform domestic stakeholders



▶ [Access the PIC Circulares](#)

# Key documents for the PIC procedure: Decision Guidance Documents (DGDs)



## Who prepares, who adopts and who disseminated the DGDs?

- Prepared by CRC for each Annex III chemical.
- Approved by COP.
- Sent to all Parties by Secretariat with request to provide import response.

## What information is contained in the DGDs?

- Scope of chemical subject to the PIC procedure.
- Chemical's characteristics
- Summary of why the chemical was banned/severely restricted or (for SHPF) problems under conditions of use.

## What is the role of the DGDs in the PIC procedure?

- Help governments assess risks connected with handling and use.
- Enable informed decisions about future import.

# What are import responses?

Import responses are the decisions provided by Parties indicating whether or not they will consent to import the chemicals listed in Annex III to the Convention.



Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade

English Español Français

## Import Responses

You are here: Rotterdam Convention > Procedures > Import Responses > Database

Overview

Form and Instructions  
Database of Import Responses

## Database of Import Responses

In this section you will find specific information regarding import responses from Parties to the Rotterdam Convention.

### What is an Import Response?

Article 10 of the Convention sets out the obligations of Parties in relation to imports of chemicals listed in Annex III of the Convention and, accordingly, subject to the PIC procedure. Each Party shall transmit to the Secretariat, as soon as possible, and in any event no later than nine months after the date of dispatch of the decision guidance document for a chemical, a response related to the future import of the chemical concerned, consisting of either a final decision or an interim response. If a Party modifies this response, it shall submit the revised response as soon as possible. An overview of the new import responses submitted by Parties are published every six months, in June and December, in the PIC Circular.

Recently transmitted By Party By Chemical Cases of failure to submit responses

ChemicalName	Category	Party	Response	Decision	Date published	Revised
Endosulfan	Pesticide	Paraguay	Final decision	No consent to import	12/6/2024	
Methamidophos	Pesticide	Viet Nam	Final decision	No consent to import	12/6/2024	
Methamidophos	Pesticide	Paraguay	Final decision	No consent to import	12/6/2024	
Methamidophos	Pesticide	New Zealand	Final decision	Consent to import only subject to specified conditions	12/6/2024	
Monocrotophos	Pesticide	Paraguay	Final decision	No consent to import	12/6/2024	
Phorate	Pesticide	Viet Nam	Final decision	No consent to import	12/6/2024	

- ▶ [PIC Circular](#)
- ▶ [Database](#) of import responses



# Which obligations do Parties have in relation to imports of Annex III chemicals?

## Article 10, paragraph 1

- Implement appropriate legislative or administrative measures to ensure timely decisions.

## Article 10, paragraph 2

- Transmit a response concerning the future import of the chemical.

## Article 10, paragraph 8

- Make import responses available to those concerned within jurisdiction.

## Article 10, paragraph 9

- Ensure trade neutrality.



# Type of import responses

The import response shall consist of either:

- a) a **final decision** pursuant to national legislative or administrative measures; or
- b) an **interim response**.

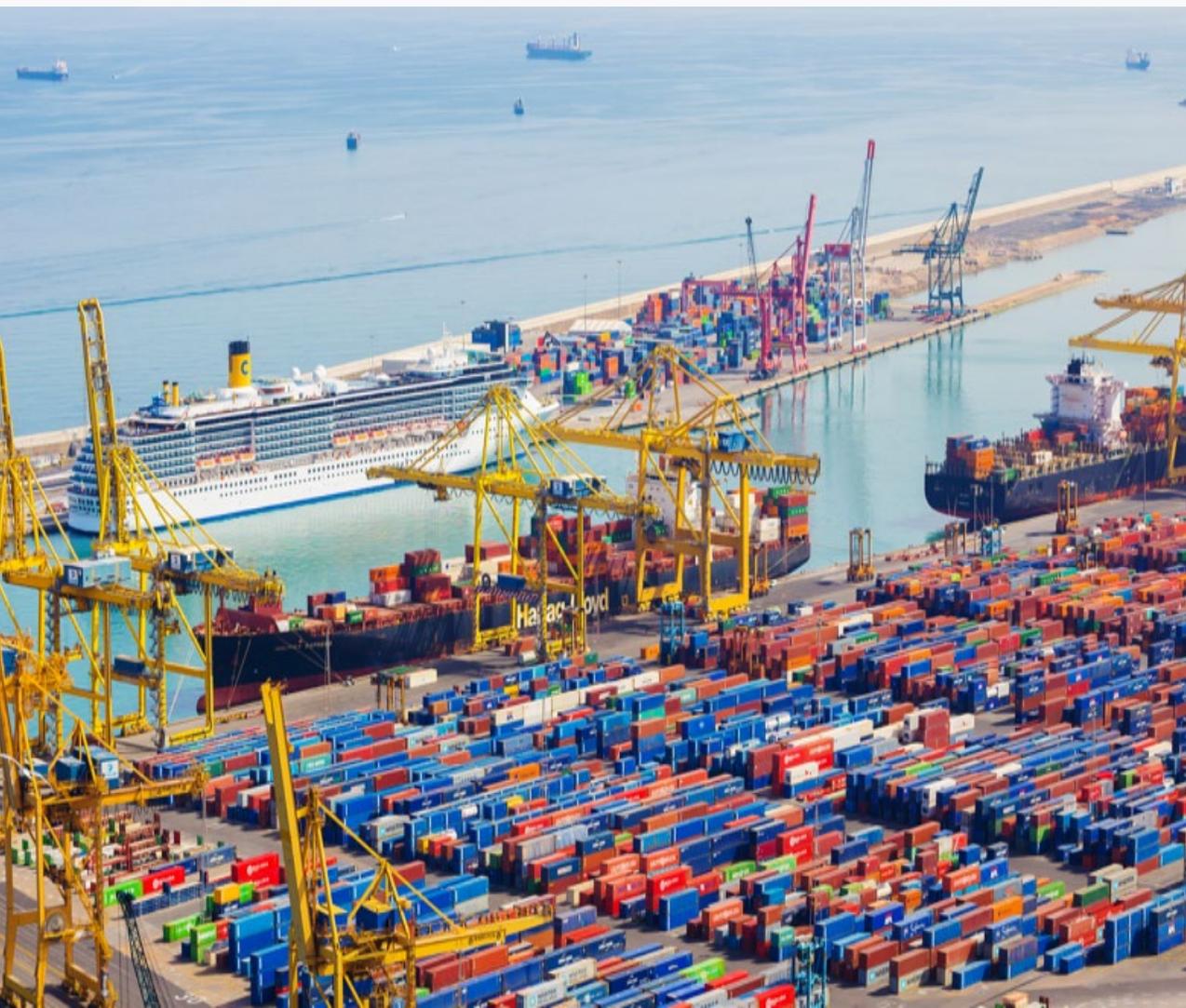




# Which considerations could be taken into account in taking decision on future imports?

- 1) Current production/use
- 2) Existing chemicals management infrastructure
- 3) Comparability with the notifying Party
- 4) Availability of alternatives
- 5) Obligations under the Stockholm Convention
- 6) Annex III Categories
- 7) Trade neutrality
- 8) National consultations

# Information exchange



The Rotterdam Convention facilitates information exchange among the Parties on a very broad range of potentially hazardous chemicals, including via the following:

- Notifications of final regulatory action
- Proposals to list SHPFs
- Import responses
- Export notifications
- Information accompanying exported chemicals
- Information exchange under Article 14



# Parties

“Party” means a State or regional economic integration organizations that has consented to be bound by the Convention and for which the Convention is in force.



## Development of national laws to implement the Convention:

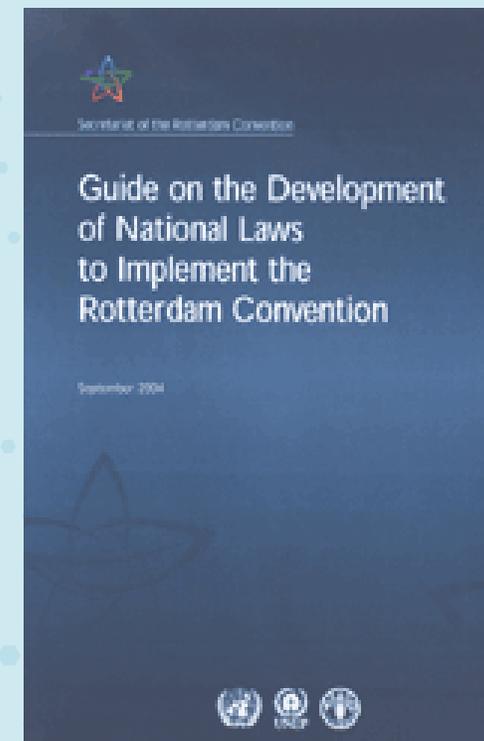
- Each Party to develop a sufficient legal basis and set of requirements and procedures to give effect to the obligations at the national level.
- Left to individual Parties to determine how to do so.
- Article 15: each Party shall take such measures as may be necessary to establish and strengthen its national infrastructures and institutions for the effective implementation of this Convention.

# Parties

RC COP encouraged Parties to provide the Secretariat with texts of national legislation and other measures adopted by them to implement the Convention



Guide on the Development of National Laws to Implement the Rotterdam Convention available to support Parties in the development of national laws to implement the Rotterdam Convention and in ensuring implementation and compliance.



# Thank you!

Lina Fortelius, Programme Management Officer, BRS Secretariat  
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**Food and Agriculture  
Organization of the  
United Nations**



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