



Civil Society Press Statement

“Hazardous Pesticides: The Silent Killer in Uganda”

January 5, 2025, Kampala, SEATINI Offices, Bukoto-Kampala

We the undersigned Civil Society Organizations (CSOs) committed to promoting sustainable agricultural trade, food safety and sovereignty, climate, gender justice, biodiversity restoration, human and environmental rights, and equitable development are concerned about the inappropriate use of Hazardous Pesticides in Uganda and do hereby call upon the Government of Uganda to regulate and BAN all ‘Hazardous Pesticides’ especially Glyphosate and Chlorpyrifos on the market in Uganda.

The Food and Agriculture Organisation (FAO) and World Health Organisation (WHO) definition of ‘pesticides’ is *“any substance, or mixture of substances of chemical or biological ingredients intended for repelling, destroying or controlling any pest, or regulating plant growth.”* This includes materials that modify pest behaviour or physiology (insect repellents, synergists) or affect crops during production or storage (herbicide safeners, germination inhibitors), as well as insecticides, fungicides and herbicides.

We recognize that agriculture is the mainstay of Uganda’s economy employing around 70 percent of the working population; most of them practicing subsistence farming. The sector accounts for about 24% of Uganda’s gross domestic product (GDP); and is the main source of food, raw materials for industries and foreign exchange.¹ According to the National Organic Agriculture Policy, Uganda’s agriculture system is by default largely organic.²

We note that the sector is facing significant challenges that hinder its potential for growth and sustainability. These include, inter alia, declining soil fertility, over-reliance on rain-fed agriculture, inadequate access to modern farming technologies, poor infrastructure and vulnerability to climate change.

We recognize that the persistent challenge of pest resistance, given Uganda’s tropical climate which favors pest diversity and faster multiplication rates. Pest and disease management remain one of the major production constraints for farmers of different crops.

These challenges inhibit productivity, negatively impact peoples’ livelihoods and compromise the attainment of the Sustainable Development Goals (SDGs), particularly Goal 2 (Zero Hunger).

We have further noted that in order to increase agricultural productivity controlling harmful pests, diseases and invasive weeds is critical.

¹ Annual Agricultural Survey (AAS) 2019- Statistical Release (Accessed on https://www.ubos.org/wp-content/uploads/publications/05_2022/Uganda_UBOS_StatRelease_AAS2019-2024-final.pdf)

² National Organic Agriculture Policy, 2019



Pesticides continue to be the main tool used for pest management worldwide with a projection of about USD309 billion by 2025 (UNEP, 2022).

The Food and Agricultural Organisation (FAO) asserts that the total quantity of agricultural pesticides used in Uganda doubled in 12 years (2010 – 2022) from 2,990.23 tonnes to 6,009.78 tonnes (FAO STAT, 2024). Similarly, the monetary value of pesticides imported to Uganda more than doubled from \$ 32.57 million to \$75.87 million in 2022 with a peak import value of 108.57 million reported in 2020 (FAOSTAT,2024).

Currently, there are approximately more than 40 registered pesticide importing companies in the country. The increased use of pesticides is attributed to their use for weeding and the increased use of hybrid seeds and livestock.

We have observed that according to the official Uganda agrochemical register at the Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) and the National Drug Authority (NDA), the country had at least 115 active ingredients (ais) and 669 brands of synthetic pesticides legally registered for use in Uganda by the end of 2023 (FoSCU, 2024; MAAIF, 2023; NDA, 2023).

Synthetic pesticides are persistent organic chemicals manufactured to repel, immobilize, incapacitate, kill organisms considered as pests.

We are alarmed that according to the 2024 Food Safety Synthesis Report published by the Food Safety Coalition Uganda (FoSCU) on “*Food Safety-Crop Protection Nexus: Insights from the Uganda’s agriculture sector*” of the legally registered active ingredients, 47.8% and 68.6% of the brands in Uganda qualified as Highly Hazardous Pesticides(HHPs) according to the Pesticide Action Network(PAN) criteria for Highly Hazardous Pesticides HHPs (FoSCU, 2024; PAN, 2021). On the other hand, FoSCU reported that 15.6% of the registered active ingredients and 19.2% of the registered brands in Uganda qualified as HHPs in accordance with the FAO/WHO-Joint Meeting on Pesticide Management (JMPM) criteria (FoSCU, 2024; JMPM, 2008).

Highly Hazardous Pesticides (HHPs) are classified as reproductive toxicants (have potential to negatively affect the human reproductive system and have adverse effects on pregnancy outcomes and reduced fertility).

It is worth noting that by July 2023, 65.5% of the 55 flagged active ingredients registered for use in Uganda and yet considered as Highly Hazardous Pesticides (HHPs) according to the Pesticide Action Network (PAN) criteria, were not approved for use in the European Union (EU). The majority (49%) of these are highly toxic to bees, 20% are carcinogenic and reproductive toxicants while 18% are probable carcinogens, fatal if inhaled (H330), EU Globally Harmonized System (GHS) reproductive toxicants (1A,1B); 12% WHO 1b (Highly Hazardous) and 9% are highly persistent in water and soil and are highly toxic to aquatic organisms. In addition, some of the active ingredients are considered

EU Globally Harmonized System (GHS) Mutagenic (1A,1B (have ability to mutate the DNA) and are also endocrine disruptors.

We are aware that Pesticides are significantly impacting health, biodiversity, socio-economic well-being, trade, and food security. The WHO (2020) estimated that 385 million cases of unintentional pesticide poisoning, including 11,000 deaths, mostly in low- and middle-income countries are registered annually worldwide. The effects of pesticides from chronic to acute depend not only on how heavily they are applied but also on their toxicity, and the susceptibility of non-target organisms that get sprayed, ingest pesticide granules, or consume contaminated water or food.

According to UNICEF, pregnant and breastfeeding mothers, children under the age of five and elderly are more vulnerable to the effects of pesticides for example, if exposed to aerially sprayed pesticides, children will inhale *double the amount of an average adult*. On the same note, due to the small size of liver and kidney, the same chemical is likely to be *10 times more toxic* to a child than to an adult (UNICEF, 2018).³

We are also concerned that the increased use of highly hazardous pesticides in Uganda is a threat to the realization of the right to adequate food, people's livelihoods and farmers' rights.

We are further concerned that pesticide runoff is reducing aquatic species diversity by 42% (IUCN, 2021) and threatening pollinators like bees, critical for 75% of global crop production.

According to the European Environmental Agency, pesticides are intrinsically harmful to living organisms. When used outdoors, they can impact ecosystems even when they are intended to exclusively target a specific pest. If pesticide levels exceed critical thresholds, individually or as mixtures, they affect ecological processes and make ecosystems less diverse.

We are further concerned that high pesticide costs, counterfeits, and health-related productivity losses burden small-scale farmers. Counterfeit agrochemicals make up 40% of Uganda's market, causing financial losses (FAO, 2019). FAO (2020) estimated that Africa loses \$4 billion annually to pesticide mismanagement.

We have further noted that according to UBOS 2021, Uganda lost over \$60 million in fresh produce exports in 2020 due to residue violations (UBOS, 2021).

Currently, there are growing concerns about pesticide misuse, including improper application, counterfeit products, and insufficient training.

Increasingly, farmers face a high risk of exposure due to the use of toxic chemicals or counterfeit pesticides whose use is either banned or restricted in other countries, improperly regulated application

³ UNICEF, 2018. *Understanding the Impacts of Pesticides on Children: A discussion paper*.

techniques, poorly maintained or totally inadequate spraying equipment and unacceptable storage practices, among many other similar issues.⁴

Glyphosate-based herbicides, in particular, have raised significant alarm globally due to their potential environmental and health risks. In Uganda, glyphosate use has become widespread, especially among large-scale commercial farms and in crop management practices. While glyphosate is a widely used herbicide for weed control, its use has been linked to a range of environmental and health issues, such as contamination of water sources, soil degradation, and potential carcinogenic effects on humans. The increasing use of such chemicals without adequate regulation, monitoring, and education poses a significant risk to the health of farmers, consumers, and ecosystems.

The uncontrolled use of pesticides, including glyphosate-based herbicides, is not just a local issue; it is intricately tied to global environmental challenges, especially climate change. Pesticide misuse exacerbates soil health degradation, reduces biodiversity, and can lead to water pollution, all of which contribute to the vulnerability of the agricultural sector to the impacts of climate change. As global temperatures rise and weather patterns become increasingly erratic, Uganda's agriculture faces heightened risks, including crop failure, water scarcity, and reduced food security.

We note that the use of pesticides to produce food, both to feed local populations and for export, should comply with national regulations and laws, international commitments and conventions and sustainable agricultural practices.

We note that Uganda is a party to several international conventions, including the Rotterdam Convention, Stockholm Convention and the Montreal Convention. The broad purpose of these Conventions is to prevent humans and the environment from being exposed to the adverse effects of hazardous chemicals and waste at all stages of their life cycle, from production to disposal.

We have further noted that the Constitution of the Republic of Uganda, 1995 (As Amended) provides under Objective XIV that the State shall endeavor to fulfill the fundamental rights of all Ugandans to social justice and economic development which includes, inter alia, access to clean and safe water. Objective XXI provides that the State shall take all practical measures to promote a good water management system at all levels. Objective XXII on food security and nutrition, Article 39 provides that every Ugandan has a right to a clean and healthy environment.

We commend Government that in 2006, the Agricultural Chemicals (Control) Act (hereinafter called the "Act") was passed with the aim of controlling and regulating the manufacture, storage, distribution and trade in, use, importation and exportation of agricultural chemicals and for the other related matters." This Act is relevant in the protection of the right to health and the right to adequate food of all Ugandans by regulating agrochemical use.

⁴ <https://www.developmentaid.org/news-stream/post/160678/illegal-pesticide-use-in-developing-countries-eo>

We have, however, noted with concern that the regulations, as required to be passed under the Act, have not been enacted and passed. Further still, there is the glaring challenge of weak implementation of the Agricultural Chemicals (Control) Act.

We also commend Government for setting up a special Committee to study and profile the various agrochemicals, acaricides and inputs and their various sources that are available on the market in Uganda.

We are cognizant of the fact that pesticides can prevent large crop losses and will therefore continue to play a role in agriculture. However, the effects of exposure to highly hazardous pesticides on humans and the environment are a continuing concern.

We have further noted the narrative peddled by the Multinational Corporations, chemical industry and industrial agriculture actors that pesticides are indispensable to modern agriculture, climate change mitigation, or food security. This narrative is driven more by commercial and profiteering interests rather than by evidence and goodwill for smallholder farmers.

We are reasserting that sustainable, agroecological farming practices are the key to addressing the challenges facing Uganda's agriculture sector while protecting health, biodiversity, and the environment, breaking the cycle of pesticide dependency.

Against the above context, we hereby recommend as follows;

- The Agricultural Chemicals Control Board under Ministry of Agriculture, Animal Industry and Fisheries should expedite its work and profile the various agrochemicals, acaricides and inputs and their various sources that are available on the market in Uganda.
- Government should ban importation of highly hazardous pesticides.
- Government through the Department of Crop Inspection and Certification at MAAIF should strengthen the regulation, management, use, handling, storage and trade of agrochemicals in Uganda.
- Government and other stakeholders should purposively plan and budget for education and awareness on the management, use, handling, storage and trade of agrochemicals in Uganda
- Government should strengthen research and innovation for sustainable approaches such as agroecology and best pest and disease management technologies.
- Government should enhance domestic resource allocation for research and innovations specifically for Integrated Pest Management and Agroecology.
- Government should Fasttrack development and completion of the National Agroecology Strategy



- The upcoming Extra- Ordinary Summit of the Comprehensive African Agriculture Development Programme (CAADP) due to take place in Uganda from January 9 to 11, 2025, should consider Agroecology as a core strategy and approach to safeguard African biodiversity, improve nutrition and health, enhance soil health, increase resilience to climate and other crises, and strengthen local food systems.

Conclusion

Revamping Uganda's agriculture sector through sustainable agricultural practices requires a multi-faceted approach that addresses both environmental and socio-economic challenges while promoting long-term food security and resilience. The ongoing debate on agrochemicals use in Uganda should be transparent, respectful without undermining the efforts of smallholder farmers.

-ENDS-

Signed By:

1. Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI)
2. Participatory Ecological Land-Use Management (PELUM) Uganda
3. CARITAS Uganda
4. Gender, Environment and Development Action
5. Centre for Food and Adequate Living Rights (CEFROHT)
6. Alliance for Food Sovereignty in Africa (AFSA)
7. CONSENT
8. Eastern and Southern Africa Small Scale Farmers' Forum (ESAFF) Uganda
9. Food Rights Alliance (FRA)
10. Food safety coalition Uganda (FoSCU)