

April 15, 2015

**To: Pesticide Policy Technical Advisory Committee**  
Fertilizer and Pesticide Authority

## **CIVIL SOCIETY ORGANIZATIONS' POSITION PAPER ON THE ISSUE OF BANNING AERIAL SPRAYING**

The banana industry has become one of the country's biggest economic contributors because of the huge demand for the crop in the global market. Not only is it a major contributor to our annual GDP growth, it has also provided livelihood to hundreds of Filipinos. Thus, it is in the interests of the country that the industry be given reasonable support. This support, however, should not be at the expense of its workers and the agricultural communities it depends on.

One of the pressing issues that the industry has been facing is the use of aerial spraying to apply pesticides which combat banana diseases. Many industries are using this method due to its practicability and cost-effectiveness. However, questions about its impact on human health and environment have stirred a public outcry among several groups to ban aerial spraying and shift to ground spraying. But banana plantations are adamant against shifting to ground spraying as it allegedly entails more costs on their part. The Interface Development Interventions (IDIS), Inc., an environmental non-government organization based in Davao City, says otherwise. In a commissioned study (*See ANNEX A. A Financial Statement Study of Shifting from Aerial to Ground Spraying*), IDIS found out that the banana industry can still survive with shifting to ground spraying, although it would impose some cost. Despite the additional expenses required in shifting to ground spraying and the lower profit income this would result towards large plantations, overall, there is still a positive potential net return. Ground spraying also benefits small banana growers as this would mean that they would no longer pay for expensive aerial spraying fees which are being charged by big plantations, resulting to an increase in the net income of small farmers.

Further, the call to ban aerial spraying is rooted in its negative effects to public health and the environment. Since aerial spraying became the de riguer pesticide application method in banana plantations, various skin diseases and other cases attributable to toxic chemical exposure have been reported. In the communities adjacent or inside banana plantations, incidents of animals and plants dying due to hazardous chemical exposure have been reported. (*See ANNEX B and B-1*). This is because the chemicals used in aerial spraying, when released, are airborne and spread randomly, reaching areas which do not even have banana crops! These aerial drifts are also easily affected by wind speed, terrain plane size, wing span, nozzle orientation, nozzle type, droplet size, swath and spray volume (*Dr. Jim Wilson, Aerial Spraying as cited in Aerial Spray on Crops or Humans? Questioning the Legality of Agricultural Aerial Spraying by Nathaniel Oducado, 2014*).

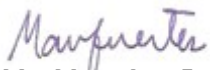
Lastly, the majority of these chemicals/pesticides used in aerial spraying are dermal sensitizers. The Department of Health (DOH) has already commented that even in low dosages, dermal sensitizers can

still cause allergic reactions. This is why it is imperative that an aerial spraying ban be imposed because the pesticide drift indiscriminately affects those who are living in and near these banana plantations. Further, pesticide use in agricultural plantations must be rigidly monitored to ensure that no violations are being committed.

Locally, Aerial Spraying has been successfully banned in other parts of Mindanao and yet, banana plantations in these areas continue to thrive. The Bukidnon Province has passed a provincial ordinance banning aerial spraying – Provincial Ordinance No. 2001-4R; similarly, North Cotabato has incorporated a ban aerial spraying provision in its Environmental Code. Overseas, France has recently announced an extensive ban on aerial spraying of pesticides throughout its territories (*See ANNEX D*). Also, the European Union has issued Directive 2009/128/EU of the European Parliament and of the Council Establishing a framework for Community action to achieve the Sustainable use of Pesticides (*See ANNEX D*).

Hence, we recommend that the Aerial Spraying Method in Banana Plantations and other Monocrop Agriculture be banned to prevent health problems and contamination of the environment. We also recommend that the Fertilizer and Pesticide Authority (FPA) designate additional personnel in every region to help monitor the environmental fate of pesticides and police the banana plantations' use of pesticides and fertilizers. Additionally, we urge them to implement grassroots capacity building activities to empower agricultural communities to undertake pesticide monitoring activities in coordination with local government agencies.

Respectfully,



**Ms. Mary Ann Fuyertes**

Executive Director

Interface Development Interventions (IDIS), Inc.

*(Signing in behalf of the groups against Aerial Spraying)*

**With Support from the following Civil Society Organizations:**

Ecowaste Coalition

OND HESED Foundation, Inc.

Advocates for Environmental and Social Justice

Alternate Forum for Research in Mindanao

Amabel Foundation - Davao City

Action for Nurturing Children and Environment

Ateneo Public Interest and Legal Advocacy Center

Arugaan

Assalam Bangsamoro People's Association

Balingaeng Agrarian Reform Beneficiaries Association  
Ban Toxics  
Batangas 2 Fisherman Association  
Biao Joaquin Agrarian Reform Beneficiaries Association, Inc.  
Buklod-Tao  
Cavite Green Coalition  
Consumer Rights for Safe Food  
Cycle for Life  
For the Upliftment of Moral, Economic, Technological, Socio-Spiritual Aspirations of Persons (METSA),  
Philippines  
Gabriela Women's Party  
Gawasnong Pagbalay, Inc.  
Global Alliance for Incinerator Alternatives  
Greenpeace Southeast Asia  
Go Organic Davao City  
Go Organic Mindanao  
Health Care Without Harm - Southeast Asia  
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Mindanao Land Foundation, Incorporated  
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Mother Earth Foundation  
Movement for Imaginals for Sustainable Societies through Initiatives, Organization and Network - Davao  
City  
November 17 Movement  
PAKISAMA Mindanao  
Panalipdan Southern Mindanao Region  
Partnership for Clean Air  
Pesticide Action Network Philippines  
Piglas Kabataan - Cebu

Pioneers and Christians and Muslim Alliance Network – Davao Oriental  
Sanlakas - Cebu  
San Lorenzo Ruiz Socio-Economic Development Foundation  
San Lorenzo Parish, T'Boli, South Cotabato  
Sarilaya - Cavite  
Save Davao Shrine Hills Advocates  
Sentro ng Alternatibong Lingap Panligal  
SIAD (Sustainable Integrated Area Development) Initiatives in Mindanao Convergence for Asset Reform and Regional Development [SIMCARRD]  
Sining Yapak  
Social Action Center Diocesan Marbel  
Think Green Initiative  
University of Mindanao Legal Advocacy Network  
Watershed Management Youth Council

**International Civil Society Organizations:**

AGENDA for Environment and Responsible Development (AGENDA), Tanzania  
Alaska Community Action on Toxics, USA  
Balifokus, Indonesia  
Center for Communication and Sustainable Development for All (CECOSDA), Cameroon  
Center for Environmental Justice and Development Organization, Kenya  
Center for Environmental Justice/Friends of the Earth, Sri Lanka  
Center for Public Health and Environmental Development (CEPHED), Nepal  
Citizens Against Chemicals Pollution (CACP), Japan  
Consumers' Association of Penang, Malaysia  
Eco-Accord, Russia  
Ecological Observation and Wetlands Conservation in Indonesia (ECOTON), Indonesia  
Environmental Justice Foundation, United Kingdom  
Environment and Social Development Organization(ESDO), Bangladesh  
Gita Pertiwi, Indonesia  
KAN Centre for Environment and Development, Canada  
National Toxics Network Inc., Australia  
Pesticide Action Network, Aotearoa New Zealand  
Pesticide Action Network, India  
RAPAM / Pesticide Action Network, Mexico  
Red de Acción en Plaguicidas y sus Alternativas para América Latina (RAP-AL), Uruguay  
Research Centre for Gender, Family and Environment in Development (CGFED), Vietnam  
Research and Education Center for Development (CREPD), Cameroon  
Sahabat Alam/Friends of the Earth, Malaysia  
South Durban Community Environmental Alliance (SDCEA), South Africa  
Taiwan Watch Institute, Taiwan

THANAL, India

Uganda Network on Toxic Free Malaria Control (UNETMAC)

Wuhu Ecology Center, China