

Date:

Reference no. IPCA / NSPM / / 09

To

The Joint Secretary (Plant Protection)
Dept of Agriculture & Co Operation,
Ministry Of Agriculture,
Room No. 147, Krishi Bhavan,
Rajendra Prasad Road,
New Delhi 110001, India.

For Kind Attention of:

Dear Sir

Sub: Representations from IPCA (Indian Pest Control Association) submitted so far for initiating various actions.

Sir, as you are aware of that IPCA is the largest association representing the interests of majority of pest management industry in India. IPCA is also actively involved in arranging training on fumigation and AFAS in close coordination with Dte of Plant Protection, Quarantine and Storage since the introduction of NSPM 11 and 12 standards in the country. We have always taken a proactive approach towards implementing the procedures as mentioned in the standards.

We wish to convey you that during the implementation of above referred standards in practice, we have noted many issues which were brought to the notice of Dte of PPQ & S from time to time through various letters written as representations from our association. We have suggested and recommended several changes to many points to make the National standards more meaningful and implementable.

Now it is more than three years have passed since the introduction of NSPM 11 & 12, and renewals of registration / approvals given under the first initiative has also commenced. These renewals of approvals given to Fumigators are currently issued for only one year validity and as per the standards – again the entire exercise shall be repeated every year. Sir, we have already sent representations requesting that approvals granted to Fumigators should not be time bound. We are attaching with this – several letters written from time to time to the Dte of PPQS. We have had meetings and discussions with different officials at various levels of the DPPQS including honourable PPA. However there has been no concrete action on any of our suggestions and discussions. NSPM 11 and 12 have still not been revised and it is very difficult to function in the absence of proper revised guidelines. We are therefore constrained to seek your intervention to protect the country's economic interest as well as our concern for industry.

The major issues for which we wish to be granted a hearing in person are listed as below:

1. Validity of renewal of approvals granted to fumigators to be extended from the current provision of every year.
2. Issue of state governments refusing to issue Licence (Form VI C – for storage of restricted pesticides for two years on the basis on current one year validity).
3. Changes to be effected to the NSPM standards as per our suggestions and representations to make it more user friendly.
4. To have one composite standard in place for fumigators instead of current two different standards – NSPM as well as AQIS apart from ISPM 15.
5. Up gradation of various ground facilities at all major ICDs and Ports for fumigators usage.

Sir, we are also attaching our representations made so far for your kind information and perusal and in support of our above request.

Yours faithfully,
For Indian Pest Control Association

President

Chairman, Legal Affairs Committee

CC:

1. Plant Protection Advisor to the Govt. Of India, Dte. Of P. P. Q and S. N.H. IV, Faridabad, Haryana
2. Website IPCA – for members knowledge.