

13 March, 2017

## **PAN Asia Pacific Intervention on Evaluation**

Given by Meriel Watts (PAN AP)

Thank you Dr. Nurick for your presentation and evaluation of what is a very complex set of issues. PAN would like to reflect on some aspects of this exercise.

We appreciate your comment that progress on most issues of concern is “modest at best.”

We understand that the evaluation was undertaken “From the perspective of stakeholders” – as a result it appears to have taken a very uncritical look at the information provided to it. For example, it noted that pesticide container management of pesticides is part of industry’s support of SAICM. This is true, and good, but a critical look would have noted that this programme barely scratches the surface of the problem and the dumping of containers in waterways and fields and their unsafe reuse for food and water storage remains a critical issue. One recent survey in Bangladesh found that 100% of containers are not being recycled – they are being dumped in the environment or used in homes.

The report notes in developing countries that CSOs have done much to raise awareness about pesticides. Again it should have noted that we have barely scratched the surface because of a lack of finances. It would have been good to analyse how much SAICM actually contributed to this – for example PAN, a network of about 600 organisations in 100 countries, has been doing this work for 35 years, and SAICM has contributed little into it.

Lastly, the Evaluation omitted to note that SAICM has no programme on HHPs and it would be useful to hear from you what impact that failure may be having on the ability to achieve sound management of these particular chemicals.