

## EXCEPTION POLICY FOR PESTICIDE USE

### LDC RESPONSIBLE SOURCING PROGRAM – ADVANCED

Updated: November 2022

#### 1- Purpose and Scope

This document aims to describe the conditions and process for authorizing the exceptional and temporary use of extremely and highly hazardous pesticides by farmers part of LDC Responsible Sourcing Program – Advanced supply chains.

Under LDC Responsible Sourcing Program – Advanced the use of pesticides is governed by the provisions of LDC [Code of Conduct for Coffee Suppliers](#), which follows the guidelines of the [Global Coffee Platform's Lists of Pesticides](#).

The LDC Code of Conduct for Coffee Suppliers establishes the following requirements:

- **3D10:** ban the use of extremely and highly hazardous pesticides included in the Global Coffee Platform's Prohibited List. This includes pesticides listed by the Stockholm Convention, the Rotterdam Convention and the Montreal Protocol; pesticides that meet the classes Ia (extremely hazardous) or Ib (highly hazardous) criteria of the WHO Recommended Classification of Pesticides by Hazard; pesticides that meet the carcinogenicity categories 1A and 1B criteria of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS); as well as pesticides categorized as fatal if inhaled (H330) by the GHS;
- **3D11:** substitute the use of the pesticides included in the Global Coffee Platform's Phase-out list for less toxic alternatives, and only use them while wearing the highest level personal protective equipment, with specific mitigation practices if registered less toxic alternatives are not available. This includes pesticides that meet the mutagenicity categories 1A and 1B and reproductive toxicity categories 1A and 1B criteria of the GHS, as well as pesticides with proven environmental toxicity (very toxic to aquatic organisms and pollinators, very persistent, very bio-accumulative);

The Exception Policy for Pesticide Use applies to the pesticides encompassed in the requirement 3D10. The use of those pesticides is considered an Unacceptable Practice (UAP) under RSP-Advanced assurance framework, and it will not be accepted if no exception has been granted.

#### 2- Conditions for granting an exception

Temporary exceptions will be granted for prohibited pesticides under the following conditions:

- Exceptions are granted on a case-by-case basis for specific countries or regions, for a specific pest or disease and for a defined timeframe.
- The prohibited ingredient for which an exception is requested is allowed by national legislation and farmers respect the maximum residue levels (MRLs) established in the country.

- A strong rationale and compelling evidence have been provided by the farmers to justify the exception (e.g., lack of effective alternative, pest outbreak, etc.).
- Farmers and workers must use the highest level of protective equipment when handling and applying prohibited pesticides.
- Farmers must have a plan and process in place to reduce to the minimum the adverse impacts of the prohibited pesticides on health and environment, including training to workers on the safe use of the products and regular health examinations.
- Farmers must be looking for alternatives, including Integrated Pest Management methods and less harmful products.
- Even if it is not a precondition, LDC will also review whether exceptions have been granted for the same ingredient and country by other responsible sourcing and sustainability schemes.

### 3- Process for establishing an exception

The steps for establishing an exception are the following:

1. Farmers prepare and submit a request for the exceptional use of a prohibited pesticide, using the template in **Annex 1**. Separate requests must be submitted for each active ingredient. Requests can be submitted by individual farmers or by a group of farmers. The number of farmers concerned by the exception will be taken into consideration when evaluating the request. Requests must be shared in writing to the Coordinator of the Internal Management System of the LDC RSP – Advanced supply chain.
2. Once received, the request is evaluated by LDC agronomists in the country for which the exception is requested, and the agronomists issue a recommendation, that is shared with LDC National and Regional Sustainability managers and LDC Global Responsible Sourcing Manager. The agronomists have up to 15 working days to assess the request and issue their recommendation.
3. Once they receive the request, LDC National and Regional Sustainability managers and LDC Global Responsible Sourcing Manager have up to 15 working days to assess the request and issue a decision. If the exception is accepted, the decision and the conditions for applicability are communicated to all the farmers in the country for which the exception has been requested. The product is also added to the list of products benefiting from exception (see below). If the exception is rejected, farmers are informed about the reasons for the rejection. Farmers will have the possibility to submit another request at a later stage if the context evolves.

### 4- List of pesticides benefiting from an exception

Active Ingredient	CAS N°	Toxicity Classification	Use	Country & region(s)	Expiration date
No exception currently granted					

**ANNEX 1**

**Template for requests concerning the exceptional use of pesticides**

<b>Request submitted by</b>	<b>Name</b>	
	<b>Address</b>	
	<b>Contact details</b>	
<b>If group request, precise who is concerned</b>		
<b>Request received by</b>		
<b>Date of reception</b>		

<b>Active Ingredient</b>	<b>CAS N°</b>	<b>Toxicity Classification</b>	<b>Used for</b>	<b>Country &amp; region(s)</b>	<b>Authorized in country (Y/N)<sup>1</sup></b>	<b>Timeline for the exception<sup>2</sup></b>
<b>Reasons for the exception</b> (provide details and evidence)						

**DECISION (reserved for LDC)**

<b>Recommendation from LDC Agronomist</b>	
<b>Exception approved (Y/N)</b>	
<b>Reasons for the decision</b>	

<sup>1</sup> Precise relevant regulation.

<sup>2</sup> Precise until when the exception is requested (Month/Year)