



CIVIL SOCIETY ORGANIZATIONS'

**TECHNICAL COMMENTARY, OBSERVATIONS,
RECOMMENDATIONS, AND PROPOSED EDITS**

**TO THE DRAFT GUIDELINES FOR THE POST-REGISTRATION
REVIEW OF AGRICULTURAL PESTICIDES IN UGANDA**



June, 2026

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RECOMMENDATIONS, AND PROPOSED EDITS TO THE DRAFT GUIDELINES FOR THE
POST-REGISTRATION REVIEW OF AGRICULTURAL PESTICIDES IN UGANDA**

Submitted to:

THE MINISTRY OF AGRICULTURE, ANIMAL INDUSTRY AND FISHERIES (MAAIF)

Consolidated by:

THE FOOD SAFETY COALITION OF UGANDA(FOSCU)

**ON BEHALF OF PARTICIPATING CIVIL SOCIETY ORGANIZATIONS AND TECHNICAL
PARTNERS**

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CEFROHT | PELUM Uganda | PELUM Association Regional Secretariat | ACSA |
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Table of Contents

EXECUTIVE SUMMARY -- -- -- -- --4

ACRONYMS -- -- -- -- --6

INTRODUCTION -- -- -- -- -- 7

Purpose-- -- -- -- --8

Participating Civil Society Organizations-- -- -- -- --8

METHODOLOGY -- -- -- -- -- 9

Justification- -- -- -- --9

**CIVIL SOCIETY ORGANIZATIONS’ TECHNICAL REVIEW,
OBSERVATIONS, RECOMMENDATIONS, AND
PROPOSED EDITS TO THE DRAFT GUIDELINES- -- -- -- -- -11**

CHAPTER ONE OF THE GUIDELINES: -- -- -- -- -- -12

Justification (Section 1.3)-- -- -- -- -- 14

**CHAPTER TWO OF THE GUIDELINE: LEGAL &
POLICY FRAMEWORK - -- -- -- -- -15**

2.1. National Policy and Legal Framework - -- -- -- -- 15

 The Constitution of the Republic of Uganda -- -- -- -- -- 15

 The National Environment Act, 2019 -- -- -- -- -- 16

2.2. International Frameworks -- -- -- -- -- 16

CHAPTER 3: POST REGISTRATION REVIEW PROCESSES- -- -- -- -- -19

3.1. Key drivers for post-registration review-- -- -- -- -- 19

3.2.1 Scheduled Periodic Post-Registration Review -- -- -- -- -- 20

3.2.2. Unscheduled Post-Registration Reviews -- -- -- -- -- 20

3.2.2. Unscheduled Post-Registration Review - -- -- -- -- 21

3.3.1. The Trigger - -- -- -- -- 23

3.3.3. Public Consultation-- -- -- -- -- 23

3.3.7. Assessment -- -- -- -- -- 25

3.3.8. Decision Making ----- 27

3.3.9. Communication ----- 29

3.3.10. Monitoring and Follow-Up ----- 30

3.3.11 Appeal ----- 31

**CSOs’ ASKS AND PRAYERS TO THE MINISTRY OF AGRICULTURE,
ANIMAL INDUSTRY AND FISHERIES -----39**

OUR COMMITMENT AS CIVIL SOCIETY ORGANIZATIONS -- -- --41

CONCLUSION -----43

EXECUTIVE SUMMARY

The Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) is developing the Draft Guidelines for the Post-Registration Review (PRR) of Agricultural Pesticides as part of ongoing efforts to strengthen Uganda's pesticide regulatory framework. The proposed Guidelines represent a significant policy and regulatory milestone by introducing a structured, risk-based, evidence-informed, and systematic approach to the post-registration oversight of agricultural pesticides.

This reform presents an important opportunity to enhance pesticide safety, protect public health, safeguard environmental integrity, strengthen food safety systems, and improve regulatory accountability within Uganda's agricultural sector.

Recognizing the far-reaching implications of pesticide regulation on human health, food systems, environmental sustainability, agricultural productivity, trade, and livelihoods, a coalition of civil society organizations (CSOs), coordinated by the Food Safety Coalition of Uganda (FoSCU), conducted a comprehensive technical review of the Draft Guidelines.

The review involved a participatory and multi-stakeholder process bringing together experts and practitioners from food safety, public health, agriculture, consumer protection, environmental management, human rights, sustainable agriculture, trade, academia, and farmer organizations.

Overall, the participating CSOs commend MAAIF for developing the PRR Guidelines and acknowledge the Government's commitment to strengthening pesticide governance through a more predictable, transparent, and science-based regulatory system. The review found that the draft Guidelines establish an important foundation for post-registration pesticide monitoring and decision-making.

However, several strategic, technical, legal, institutional, and implementation gaps require further strengthening to ensure that the final Guidelines effectively respond to Uganda's public health, environmental, food safety, and agricultural development priorities.

The review identified key areas for improvement, including the need to strengthen alignment with Uganda's current legal framework and relevant international obligations; enhance stakeholder inclusiveness by explicitly recognizing farmers, farmer organizations, consumers, trade institutions, and vulnerable populations;

improve transparency, accountability, and conflict-of-interest management within regulatory decision-making processes; establish accessible complaint, incident reporting, consultation, communication, monitoring, and appeal mechanisms; and strengthen implementation coordination, enforcement, resource mobilization, and institutional capacity.

The submission further recommends integrating gender-responsive approaches, vulnerability-sensitive risk assessment, climate-related risk considerations, community-based surveillance systems, and stronger public participation mechanisms to ensure that pesticide regulatory decisions are informed by both scientific evidence and field realities. Particular emphasis is placed on improving access to information, supporting meaningful participation of smallholder farmers and rural communities, and ensuring that post-registration review outcomes are communicated in timely, inclusive, and accessible formats.

In addition, the review advocates for the integration of Integrated Pest Management (IPM), agroecological approaches, and a structured pathway for the progressive identification, restriction, substitution, and phase-out of Highly Hazardous Pesticides (HHPs) in line with national priorities, international best practices, and sustainable development commitments.

The CSOs respectfully call upon MAAIF to consider and incorporate the recommendations contained in this submission, provide feedback on proposals not adopted, and convene a stakeholder validation process to strengthen consensus and ownership of the final Guidelines. The participating organizations reaffirm their commitment to supporting Government efforts in advancing responsible agrochemical management, food safety, environmental protection, public health promotion, consumer protection, and sustainable agricultural transformation.

Ultimately, the recommendations contained in this submission seek to support the development of a robust, transparent, inclusive, science-based, and rights-responsive Post-Registration Review framework that protects human health, safeguards the environment, strengthens food systems, promotes sustainable agriculture, and contributes to Uganda's long-term development aspirations.

ACRONYMS

ACSA	Advocacy Coalition for Sustainable Agriculture
AFSA	Alliance For Food Sovereignty in Africa
AUPWAE	Association of Uganda Professional Women in Agriculture and Environment
CABI	Centre for Agriculture and Bioscience International
CAADP	Comprehensive Africa Agriculture Development Programme
CEFROHT	Centre for Food and Adequate Living Rights
CONSENT	Global Consumer Centre
CSO	Civil Society Organization
EAC	East African Community
ESAFF	Eastern and Southern Africa Small-scale Farmers' Forum
FAO	Food and Agriculture Organization
FIAN	FoodFirst Information and Action Network
FOSCU	Food Safety Coalition of Uganda
FRA	Food Rights Alliance
GEDA	Gender, Environment and Development Action
HHP	Highly Hazardous Pesticides
ICESCR	International Covenant on Economic, Social, and Cultural Rights
IPM	Integrated Pest Management
KRC	Kabarole Research and Resource Centre
MAAIF	Ministry of Agriculture, Animal Industry and Fisheries
MTIC	Ministry of Trade, Industry and Cooperatives
NODPSP	National Objectives and Directive Principles of State Policy
PELUM	Participatory Ecological Land Use Management
POP	Persistent Organic Pollutants (POPs)
PRR	Post Registration Review
SDGs	Sustainable Development Goals
SEATINI	Southern and Eastern Africa Trade Information and Negotiations Institute
UNADA	Uganda National Agro-input Dealers Association
UNBS	Uganda National Bureau of Standards
UNDROP	United Nations Declaration on the Rights of Peasants
WHO	World Health Organization

INTRODUCTION

The Government of Uganda, through the Ministry of Agriculture, Animal Industry and Fisheries, is currently developing the Guidelines for Post-Registration Review of Agricultural Pesticides. The development of these guidelines represents a significant and timely milestone in strengthening Uganda's pesticide regulatory framework. The guidelines introduce a structured, risk-based post-registration review system, marking a deliberate shift from an ad hoc, hazard-based regulatory approach towards a more systematic, evidence-driven, and predictable framework for pesticide governance.

This reform is an important step towards strengthening pesticide safety, enhancing regulatory accountability, and improving the management of agricultural chemicals in Uganda. It provides an opportunity to reinforce human health protection, environmental sustainability, food safety, and agricultural productivity within a coherent post-registration oversight system.

From a civil society perspective grounded in the right to adequate food, public health protection, environmental sustainability, and food justice principles, pesticide governance remains a critical pillar of sustainable and resilient food systems. Pesticide use directly affects human health, biodiversity, environmental integrity, food safety, and the livelihoods of smallholder farmers, particularly women, children, and other vulnerable populations who often face disproportionate exposure and limited protection within existing regulatory systems.

While the draft guidelines demonstrate commendable progress through the establishment of a formal PRR framework, stakeholder engagement mechanisms, and alignment with emerging international pesticide governance trends, several critical gaps remain. These include limited integration of Integrated Pest Management (IPM) and agroecological approaches, insufficient attention to vulnerable populations and gender dimensions, weak provisions on transparency and conflict of interest management, limited clarity on institutional coordination and enforcement mechanisms, and constraints related to implementation capacity and resource requirements.

Accordingly, civil society organizations in Uganda have jointly reviewed the draft guidelines and developed consolidated observations, recommendations, and proposed technical edits aimed at strengthening the regulatory, human rights, environmental, and implementation dimensions of the PRR framework.

Purpose

To contribute to the strengthening of the Post-Registration Review Guidelines for Agricultural Pesticides in Uganda by promoting a transparent, inclusive, evidence-based, and rights-responsive regulatory framework that effectively safeguards human health, ensures food safety, protects environmental integrity, and advances sustainable agricultural systems.

Participating Civil Society Organizations

This joint civil society review was coordinated by the Food Safety Coalition of Uganda and involved the following partner organizations and institutions:

The Global Consumer Centre (CONSENT); Food Rights Alliance (FRA); Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI Uganda); Eastern and Southern Africa Small-scale Farmers' Forum (ESAFF Uganda); Centre for Food and Adequate Living Rights (CEFROHT); Participatory Ecological Land Use Management (PELUM Uganda); PELUM Association Regional Secretariat; Advocacy Coalition for Sustainable Agriculture (ACSA); Alliance for Food Sovereignty in Africa (AFSA); Centre for Agriculture and Bioscience International (CABI); Building Hope for Children; Makerere University-Department of Food Technology, Nutrition and Bio Engineering; Gender Environment and Development Action (GEDA-Uganda); FoodFirst Information and Action Network (FIAN Uganda), Kabarole Research and Resource Centre (KRC-Uganda), Broederlijk Delen (BD) and OIKOS Ministry.

METHODOLOGY

The civil society review of the Draft PRR Guidelines followed a structured, participatory, and iterative process coordinated by the Food Safety Coalition of Uganda.

- **Document Dissemination:** The draft guidelines were shared by the MAAIF focal point with the Food Safety Coalition Secretariat, which subsequently circulated the document to participating CSO partners.
- **Individual Review:** CSO partners were given adequate time to independently review, analyze, and internalize the draft guidelines and develop preliminary observations, recommendations, and proposed technical edits.
- **Collective Technical Review Meeting:** A virtual multi-stakeholder CSO technical meeting was convened, during which the draft guidelines were reviewed systematically chapter by chapter. Partners collectively discussed, refined, and validated their inputs, ensuring technical coherence and alignment of perspectives.
- **Consolidation of Inputs:** All observations, recommendations, and proposed edits were compiled and consolidated into a single harmonized CSO input document.
- **Validation and Quality Assurance:** The consolidated CSO input was circulated among participating organizations for final review, validation, and endorsement to ensure accuracy, consistency, and collective ownership.
- **Submission to Government:** The validated CSO position paper was formally submitted to MAAIF for consideration in the finalization of the Post-Registration Review Guidelines.

Justification

The PRR Guidelines represent a critical regulatory instrument for strengthening pesticide governance in Uganda. Given the public health, environmental, trade, and food system implications of pesticide use, it is essential that the guidelines are comprehensive, inclusive, and grounded in strong scientific, legal, and human rights principles.

Civil society engagement in this process is anchored in the recognition that pesticide risks are not evenly distributed, with smallholder farmers, rural communities, women, and children often bearing disproportionate exposure burdens. Strengthening the guidelines, therefore, requires not only technical refinement but also the integration of equity, transparency, and accountability principles to ensure fair and effective regulatory outcomes.

This CSO review seeks to complement government efforts by providing evidence-based, field-informed, and technically grounded inputs that enhance the quality, implementability, and legitimacy of the PRR framework.

CIVIL SOCIETY ORGANIZATIONS' TECHNICAL REVIEW, OBSERVATIONS, RECOMMENDATIONS, AND PROPOSED EDITS TO THE DRAFT GUIDELINES

This section presents the findings of the Civil Society Organizations' technical review of the Draft Guidelines for Post-Registration Review of Agricultural Pesticides. The review was undertaken to assess the adequacy, coherence, inclusiveness, and implementability of the proposed regulatory framework, while identifying opportunities for strengthening its alignment with public health, food safety, environmental sustainability, human rights, and good regulatory governance principles.

The section systematically highlights the specific chapters, sections, and provisions of the draft guidelines where CSO actors identified gaps, inconsistencies, omissions, or areas requiring clarification and enhancement. For each provision reviewed, the section presents the observations made, recommendations proposed, and specific edits suggested for consideration by MAAIF.

The proposed inputs are intended to complement and strengthen the draft guidelines by enhancing their technical robustness, transparency, accountability, inclusiveness, and effectiveness in safeguarding human health, environmental integrity, food systems sustainability, and the interests of farmers, consumers, and other stakeholders across the agricultural value chain.

CHAPTER ONE OF THE GUIDELINES:

Background of the guideline (Section 1.0)

Observation 1

On page 1, paragraph 2, it is stated that: *“An agricultural pesticide undergoes a field efficacy trial, and upon board approval, is granted registration for 3 years.”* However, under the amended Agrochemicals (Control) (Amendment) Act, 2024, the **“Board”** was replaced by the Agricultural Chemicals Review Committee. There is therefore a need for consistency with the current legal and institutional framework throughout the document.

Recommendation

Replace all references to the **“Board”** with the “Agricultural Chemicals Review Committee” across the document.

Proposed Edit

Section 1.0 Background, paragraph 2, line 2:

“..... An agricultural pesticide undergoes a field efficacy trial, and upon the Agricultural Chemicals Review Committee’s approval, is granted registration for 3 years.”

Observation 2

On page 1, paragraph 4, the guidelines state that: *“Procedures in post-registration reviews should include the initiation of a trigger, which may be from a scheduled review or from circumstances that warrant unscheduled reviews. The regulator should allow stakeholders, including the registrant, to provide information about active ingredients, and be informed of any regulatory decision taken on the particular active ingredients systematically and predictably.”*

The provision does not clearly specify the different levels at which regulatory decisions may arise, yet national, regional, and international regulatory actions significantly influence pesticide post-registration reviews and regulatory harmonization.

Recommendation

Explicitly provide for national, regional, and international regulatory decisions to strengthen regulatory coherence and alignment with evolving global and regional standards.

Proposed Edit

Section 1.0 Background, paragraph 4, line 4:

“..... and be informed of any national, regional, and international regulatory decisions taken on the particular active ingredients systematically and predictably.”

Observation 3

In the last paragraph of page 1, the guidelines identify several stakeholders, including manufacturers of agricultural pesticides, exporters, importers such as CropLife, agro-input dealers (UNADA), civil society organizations, development partners, Ministries responsible for finance, justice, health, environment, local government, gender, and institutions responsible for standards, revenue, registration of names, and law enforcement. However, the Ministry responsible for Trade, Farmers, and Farmer associations are not explicitly included despite their critical role in trade compliance, and safe pesticide use, management, and enforcement.

Recommendation

Include the Ministry responsible for Trade, farmers, and farmer associations among the key stakeholders to ensure inclusiveness and effective multi-sectoral coordination.

Proposed Edit

Section 1.0 Background, last paragraph of page 1, line 3:

“..... The stakeholders shall include manufacturers of agricultural pesticides, exporters, importers, CropLife, agro-input dealers (UNADA), farmers and farmer associations, civil society organizations, development partners, Ministries responsible for finance, Trade, justice, health, environment, local government, gender, and institutions responsible for standards, revenue, registration of names, and law enforcement.”

Justification (Section 1.3)

Observation 4

In the last sentence of the Justification section on page 3, the draft guidelines state that: *“This enables proactive monitoring of safety, efficacy, product quality, and benefits of agricultural pesticides, ultimately strengthening farmer protection, environmental sustainability, and regulatory decision-making.”*

While the provision appropriately recognizes farmer protection, it does not explicitly provide for consumer safety and protection, which are equally critical considerations in agricultural pesticide regulation and post-registration monitoring.

Recommendation

Include consumer safety and protection alongside farmer protection to strengthen the public health and consumer protection dimensions of the guidelines.

Proposed Edit

Section 1.3 Justification, last sentence:

“..... This enables proactive monitoring of safety, efficacy, product quality, and benefits of agricultural pesticides, ultimately strengthening farmer and consumer safety and protection, environmental sustainability, and regulatory decision-making.”

CHAPTER TWO OF THE GUIDELINE: LEGAL & POLICY FRAMEWORK

2.1. National Policy and Legal Framework

The Constitution of the Republic of Uganda

Observation 5

The provisions under Section 2.1 are generally well aligned with the Constitution. However, several important constitutional provisions relevant to the rights to food and nutrition, health, equality and non-discrimination, environmental sustainability, and citizens' duties are not explicitly referenced. These provisions are critical in strengthening the human rights, public health, and environmental protection basis of the guidelines.

Recommendation

Include additional constitutional provisions under the National Objectives and Directive Principles of State Policy (NODPSP), as well as relevant Articles that reinforce the rights-based and environmental governance framework underpinning pesticide regulation and post-registration monitoring.

The additional provisions should include:

- Objective XXI on clean and safe water;
- Objective XXII on food security and nutrition;
- Objective XXIX(C) on the duties of citizens; and
- Articles 8A, 20, and 21 of the Constitution.

Proposed Edit

The Constitution of the Republic of Uganda:

"The National Objectives and Directive Principles of State Policy (NODPSP) XXI, XXII, and XXIX(C), and Articles 8A, 20, 21, 22, 39, and 245 of the Constitution of the Republic of Uganda provide for national interests, fundamental and other human rights and freedoms, equality and freedom from discrimination, the right to life, the right to a clean and healthy environment, and the protection and preservation of the environment, thereby supporting the need for a sound agricultural pesticide regulatory system."

The National Environment Act, 2019

Observation 6

The provisions cited under the National Environment Act, 2019, are relevant and clearly articulated. However, the draft does not specifically reference Section 5 of the Act, which provides for the principles of environmental management and is central to sustainable environmental governance and the management of hazardous chemicals, including highly hazardous pesticides.

Recommendation

Include a reference to Section 5 of the National Environment Act, 2019, to strengthen the environmental management and sustainability principles underpinning the guidelines.

Proposed Edit

“Provides for sustainable management of the environment and the handling of hazardous chemicals, including highly hazardous pesticides. Section 5 of the Act further provides for the principles of environmental management.”

2.2. International Frameworks

Observation 7

Several important international and regional frameworks relevant to agricultural pesticide regulation, hazardous chemical management, occupational safety, environmental protection, and regional regulatory harmonization have not been included under the International Frameworks section.

In addition, the draft refers to the *“EAC Protocols”* instead of the correct legal instrument, namely the East African Community Treaty for the Establishment of the East African Community (1999, as amended). Furthermore, the Comprehensive Africa Agriculture Development Programme (CAADP), which supports the implementation of Agenda 2063 Aspiration 1, Goal 5 on modernizing agriculture for increased productivity and production, has also been omitted.

The omission of these frameworks limits the comprehensiveness of the guidelines and weakens alignment with international obligations, regional harmonization processes, occupational health and safety standards, and environmentally sound pesticide management practices.

Recommendations

Include additional international and regional conventions, treaties, and frameworks to which Uganda is party or aligned, including the Rotterdam Convention, Stockholm Convention on Persistent Organic Pollutants (POPs), Basel Convention, Bamako Convention, the Convention on Health and Safety in Agriculture, the 2019 EAC Guidelines on Data Requirements for the Registration of Conventional Chemical Pesticides in Agriculture and Forestry, and CAADP.

Further, replace the term “*EAC Protocols*” with “Treaty for the Establishment of the East African Community (1999, as amended),” particularly Articles 105, 108, 110, and 111, which provide for cooperation in plant and animal disease control, food security, environmental management, and natural resource governance.

Proposed Edits

In addition to the frameworks already highlighted in the guidelines, the following international and regional frameworks should be included:

- ***Bamako Convention on the Ban of the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa***; prohibits the importation of hazardous and radioactive wastes into Africa, including substances banned in their country of origin for health or environmental reasons, and promotes environmentally sound management of hazardous wastes.
- ***The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade*** establishes a multilateral framework for shared responsibility and cooperation in the international trade of hazardous chemicals and pesticides that are banned or severely restricted due to health or environmental risks.

- ***The Stockholm Convention on Persistent Organic Pollutants*** provides a global framework for protecting human health and the environment from persistent organic pollutants (POPs), including toxic and long-lasting chemicals such as DDT, PCBs, dioxins, and furans. Uganda acceded to the Convention in 2004.
- ***The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal*** regulates the generation, movement, and environmentally sound disposal of hazardous wastes to protect human health and the environment from adverse effects associated with hazardous waste management.
- ***The Convention on Safety and Health in Agriculture*** establishes international standards for the protection of agricultural workers from occupational hazards, including the safe handling, packaging, labeling, use, and disposal of agricultural chemicals and pesticides.
- ***International Covenant on Economic, Social, and Cultural Rights*** (ICESCR)
- ***African Charter on Human and Peoples' Rights***
- ***UN Declaration on the Rights of Peasants (UNDROP)***
- ***The Treaty for the Establishment of the East African Community (1999, as amended)***, particularly Articles 105, 108, 110, and 111, which provide for regional cooperation in agriculture, food security, environmental management, natural resources, and plant and animal disease control.
- ***Comprehensive Africa Agriculture Development Programme (CAADP)***; supports the implementation of Agenda 2063 Aspiration 1, Goal 5, aimed at modernizing agriculture for increased productivity, sustainable agricultural transformation, and food security in Africa.
- ***The 2019 EAC Guidelines on Data Requirements for the Registration of Conventional Chemical Pesticides in Agriculture and Forestry*** specify the mandatory data and studies required for pesticide registration by national regulatory authorities and promote harmonization and streamlining of pesticide registration processes across EAC Partner States.
- The EAC Sanitary and Phytosanitary Protocol

CHAPTER 3: POST REGISTRATION REVIEW PROCESSES

3.1. Key drivers for post-registration review

Observation 8

The guidelines reference climate action in SDG alignment (section 2.2) but include no substantive provisions linking pesticide post-registration review to climate change impacts. Rising temperatures alter pesticide degradation rates, volatilization, and toxicity. Extreme weather events (flooding, drought) change exposure pathways and efficacy. Pesticide use patterns are shifting as climate-driven pest pressures evolve.

Recommendation:

Integrate climate vulnerability as an assessment parameter.

Proposed addition to section 3.1 (Key drivers)

E). Climate-related changes in pest dynamics, pesticide degradation rates, or exposure pathways that emerge during the registration period

Proposed addition to Annex 4 (new Parameter 11):

Climate Vulnerability Factor (Weight: 2 points for scheduled reviews, 4 points for unscheduled reviews)

- a. **Score 1 (Low):** Product use restricted to controlled environment agriculture; minimal climate sensitivity
- b. **Score 2 (Moderate):** Climate projections indicate moderate changes to degradation rates or pest pressure within current registration period
- c. **Score 3 (High):** Climate projections indicate significant changes (temperature increase >2°C, flooding frequency increase, drought intensification) that could materially alter safety or efficacy profile

3.2.1 Scheduled Periodic Post-Registration Review

Observation 9

Under Section 3.2.1(a), the guidelines propose that registered agricultural pesticides undergo a scheduled post-registration review every seven (7) years. Considering that pesticide registrations are granted for a period of three (3) years and are subject to renewal, a seven-year review cycle may be too long to adequately capture emerging evidence on human health, environmental risks, efficacy, product quality, and evolving regulatory decisions at national, regional, and international levels.

Recommendation

Reduce the scheduled post-registration review period from seven (7) years to six (6) years. This would align the review process with the existing pesticide registration cycle, allowing a comprehensive review to be undertaken at the second registration renewal and ensuring more timely regulatory oversight and risk management.

Proposed Edit

Section 3.2.1(a):

“Agricultural pesticides shall undergo a scheduled post-registration review every six (6) years.”

3.2.2. Unscheduled Post-Registration Reviews

Observation 10

Under Section 3.2.2(a), the guidelines provide that “*New scientific data: Evidence of new risks to human health, animals, or the environment*” may trigger an unscheduled post-registration review. However, the provision does not specify the sources or levels at which such scientific data may originate. This may create ambiguity regarding the consideration of emerging evidence generated at national, regional, or international levels.

Recommendation

Explicitly provide that new scientific data from national, regional, and international sources may trigger an unscheduled post-registration review. This will ensure that regulatory decisions are informed by the latest and most relevant scientific evidence, while promoting alignment with regional and global regulatory developments and best practices.

Proposed Edit

Section 3.2.2(a):

“New scientific data from national, regional, and international sources: Evidence of new risks to human health, animals, or the environment.”

3.2.2. Unscheduled Post-Registration Review

Observation 11

While farmers are recognized as key stakeholders in pesticide management, their role within the post-registration review framework remains largely passive. The draft guidelines do not provide a structured mechanism for community-based pesticide incident reporting, farmer-led surveillance, or systematic documentation of farmer experiences related to pesticide efficacy, poisoning incidents, pest resistance, product failure, and environmental impacts.

The absence of such mechanisms may limit the generation of grassroots evidence that is critical for identifying emerging risks and informing timely regulatory action during post-registration reviews.

Recommendation

Introduce provisions under Section 3.2.2 to establish a formal stakeholder complaint and incident reporting mechanism that facilitates community-level reporting, documentation, and escalation of pesticide-related concerns. This will strengthen post-market surveillance, enhance stakeholder participation, and improve evidence-based regulatory decision-making.

Proposed Edit

Insert a new Paragraph 2 immediately after Section 3.2.2(d):

Paragraph 2. Stakeholder Complaints and Incident Reporting

- a. Stakeholder complaints and pesticide-related incidents shall be recorded using the prescribed Complaint and Incident Reporting Form provided under **Annex 5(need to generate a complaints form)**. The form may be completed by the complainant or with the support of a Local Council leader, Agricultural Extension Worker, Police Officer, health worker, or any other competent person. The completed form shall be submitted to the office responsible for agriculture at the Sub-county, District, or Ministry responsible for Agriculture.
- b. The Sub-County Agricultural Officer shall receive and document complaints and submit them to the District office responsible for agriculture and production. The District shall compile, analyze, and submit periodic reports and urgent incident notifications to the Ministry responsible for Agriculture for appropriate action.
- c. Notwithstanding paragraphs (a) and (b), a complaint or incident report may be submitted directly to the Agricultural Chemicals Review Committee where the matter involves serious human health effects, environmental damage, widespread product failure, or any other incident requiring urgent regulatory intervention.

Additional Recommendation

Create Annex 5: **Pesticide Complaint and Incident Reporting Form** to facilitate standardized reporting of:

- Product details (trade name, active ingredient, registration number);
- Location of incident;
- Nature of complaint or incident;
- Human health effects, poisoning, or exposure;
- Environmental impacts;
- Product efficacy concerns or pest resistance;
- Date and supporting evidence; and
- Actions taken or recommended.

3.3.1. The Trigger

Observation 12

The current wording under Section 3.3.1 appears to create ambiguity regarding the initiation of Post-Registration Reviews (PRRs). Specifically, the provision seems to conflate scheduled and unscheduled review processes, yet the guidelines have already distinguished these under Sections 3.2.1 and 3.2.2 respectively. This may create uncertainty regarding the circumstances under which each type of review is triggered and implemented.

Recommendation

Separate the trigger provisions for scheduled and unscheduled post-registration reviews to ensure clarity, consistency, and alignment with Sections 3.2.1 and 3.2.2 of the guidelines

Proposed Edit

Revise Section 3.3.1 by creating two sub-sections as follows:

- (a) Scheduled Post-Registration Review (PRR): The scheduled PRR shall be initiated and conducted in accordance with the scheduled periodic post-registration review requirements provided under Section 3.2.1 of these Guidelines.
- (b) Unscheduled Post-Registration Review (PRR): The unscheduled PRR shall be initiated and conducted based on the triggers and circumstances provided under Section 3.2.2 of these Guidelines.

3.3.3. Public Consultation

Observation 13

While Section 3.3.3 provides for public consultation, the current mechanisms are largely structured around formal and written submissions. This design may limit meaningful participation by rural farmers and end-users who may face barriers such as limited internet access, low literacy levels in English, and limited familiarity with formal consultation formats.

Although the 90-day consultation period is adequate, the approach risks excluding community voices that are best captured through oral, participatory, and locally accessible engagement methods.

Recommendation

Strengthen the public consultation framework by mandating inclusive, multilingual, and participatory engagement mechanisms that accommodate oral submissions and community-based consultation approaches, particularly for rural and smallholder farmers.

Proposed Edits to Section 3.3.3

- a. *Public consultation shall include at least two district-level community engagement meetings within each relevant agro-ecological zone where the pesticide is used or likely to be used. These consultations shall be conducted in accessible formats and translated into appropriate local languages, including but not limited to Luganda, Runyankole, Luo, Ateso, and Lugbara, among others as applicable.*
- b. *Farmers, end-users, and other community stakeholders may provide oral feedback through trained and designated community facilitators. All oral submissions shall be documented in writing and submitted as part of the official consultation record by the regulator.*
- c. *The regulator shall publish an annual Digital Inclusion and Consultation Accessibility Report detailing the reach, inclusivity, and geographic coverage of public consultations across all districts, including measures taken to address participation gaps.*

Observation 14 (Gender-differentiated exposure and participation gaps)

The current guidelines do not explicitly address gender-differentiated pesticide exposure patterns, despite evidence that women and men experience distinct exposure pathways due to differentiated roles in agricultural and household activities. Women are often engaged in weeding, harvesting, post-harvest handling, water collection, and domestic cleaning tasks, which may increase cumulative exposure to pesticide residues.

In addition, women remain underrepresented in stakeholder consultation processes, which may limit the integration of gender-responsive evidence into post-registration decision-making.

Recommendation

Integrate explicit gender analysis requirements into public consultation and post-registration review processes to ensure that pesticide risk assessment and regulatory decisions reflect differentiated exposure patterns and promote gender-responsive pesticide governance.

Proposed Edit: Section 3.3.3 (Public Consultation)

“The regulator shall ensure gender-balanced representation in all public consultations. All feedback shall be systematically disaggregated by sex, age, and relevant farming roles to capture differentiated exposure experiences and impacts.”

Proposed Edit: Annex 2 (Key Actors and Obligations)

Under the Ministry responsible for Gender, Labour, and Social Development, add the following obligation:

“Ensure that gender-differentiated exposure data and gender analysis are systematically collected, integrated, and considered in post-registration review assessments and regulatory decision-making processes.”

3.3.7. Assessment

Observation 15 (Vulnerability and differential health impacts)

The current assessment framework under Section 3.3.7 primarily focuses on general human health risk without explicitly accounting for differential impacts on vulnerable population groups. This includes children, pregnant and breastfeeding women, the elderly, persons with disabilities, persons with chronic illnesses, and immunocompromised individuals.

As a result, reliance on aggregated toxicity scoring may obscure heightened exposure risks and more severe health outcomes among these sub-populations, particularly in rural and subsistence farming contexts where exposure pathways may be multiple and cumulative.

Recommendation

Integrate explicit vulnerability-sensitive criteria into the human health risk assessment and prioritization framework to ensure protection of high-risk population groups and improve the precision of regulatory decision-making.

Proposed Edit: Section 3.3.7 (Human Health Risk Assessment)

“Assessment shall include consideration of potential differential impacts on vulnerable populations, including children, pregnant and breastfeeding women, the elderly, persons with disabilities, persons with chronic illnesses, immunocompromised individuals, and subsistence farming households where multiple and cumulative exposure pathways may occur.”

Proposed Edit: Annex 3 (Weighted Prioritization Criteria)

Add a new criterion:

- Vulnerability of exposed populations in affected zones – 10% weight

Rebalance weighting as follows:

- Human health risk – 25%
- Environmental risk – 20%
- Vulnerability factor – 10%

Observation 16 (Socio-economic impacts of regulatory action)

Although Section 3.3.7 and Annex 4 reference socio-economic considerations, these are not sufficiently operationalized. In particular, there is no explicit requirement to assess the potential impacts of pesticide restriction, suspension, or cancellation on household food security, smallholder livelihoods, local employment, or access to affordable alternatives.

This creates a gap in understanding the broader welfare implications of regulatory decisions, particularly for smallholder-dependent agricultural systems.

Recommendation

Introduce a mandatory simplified socio-economic impact assessment for high-priority regulatory actions to ensure balanced decision-making that considers both public health protection and livelihood implications.

Proposed Addition: Annex 4 (Parameter 8)

For pesticide products scoring 66 and above (Restrict use or higher regulatory action), the regulator shall commission a simplified socio-economic impact assessment, including:

- a. Availability, accessibility, and affordability of suitable alternative pest control options for smallholder farmers
- b. Potential implications for household and national food security;
- c. Transition and mitigation support requirements, including farmer training, phase-out periods, and adoption of safer alternatives.

3.3.8. Decision Making

Observation 17

Section 3.3.8 introduces two parallel decision-making structures, namely the Agricultural Chemicals Review Committee and the PRR Committee. This creates institutional ambiguity regarding mandate allocation, decision authority, and accountability within the post-registration review process. In addition, the paragraph contains grammatical and structural overlaps that may lead to misinterpretation of roles and weaken clarity in implementation.

Recommendation

Streamline the decision-making framework by assigning sole decision-making authority to the Agricultural Chemicals Review Committee. This will enhance institutional coherence, reduce duplication of functions, and strengthen accountability in post-registration regulatory decisions.

Proposed Edit: Section 3.3.8 Decision Making

“The Agricultural Chemicals Review Committee shall be the sole decision-making authority for post-registration review outcomes. The Committee shall make decisions based on the principles of transparency, accountability, equity, precaution, rule of law, and evidence-based assessment to ensure that all agricultural chemicals are safe, effective, and aligned with national, regional, and international priorities and obligations.”

Observation 18: Still under section 3.3.8 Decision Making

The guidelines do not include provisions for identifying, declaring, or managing conflicts of interest among assessors, decision-makers, or technical reviewers involved in post-registration review processes. This presents a potential risk to the integrity, independence, and credibility of regulatory decision-making.

Recommendation

Introduce a mandatory conflict of interest disclosure and management framework to ensure transparency, independence, and integrity in post-registration review processes, including restrictions on participation where conflicts are declared or identified.

Proposed edit: Conflict of Interest Management

“All assessors, technical experts, and decision-makers involved in post-registration review processes shall be required to declare any actual, potential, or perceived conflicts of interest prior to participation. Where a conflict is identified, the affected individual shall be excluded from the relevant assessment or decision-making process. The competent authority shall establish procedures for independent expert review and conflict of interest management to safeguard the integrity, transparency, and credibility of regulatory decisions.”

3.3.9. Communication

Observation 19

Section 3.3.9 limits communication of post-registration decisions primarily to official government channels and provides a general three-month timeline. This approach does not adequately ensure the timely or accessible dissemination of critical regulatory information, particularly to rural farmers and end-users who may lack access to formal communication platforms. In addition, the absence of plain-language formats and community-level dissemination mechanisms limits effective risk communication, especially in urgent safety situations such as confirmed poisoning incidents or environmental contamination events.

Recommendation

Strengthen the communication framework by introducing multiple dissemination channels, simplified communication formats, and differentiated timelines for urgent versus routine regulatory decisions. This will enhance accessibility, timeliness, and public responsiveness, particularly for rural and smallholder farming communities.

Proposed Edits: Section 3.3.9 Communication

- Decisions shall be communicated within 30 days for urgent safety concerns (including but not limited to confirmed poisoning incidents, environmental contamination, or significant health risks) and within 60 days for routine regulatory decisions.
- Communication of decisions shall include multiple accessible formats and channels, including:
 - a. Plain language summaries in English and relevant local languages to ensure comprehension by end-users;
 - b. Radio announcements through community and local language radio stations;
 - c. Public notice boards at District and Sub-County Agricultural Offices;
 - d. SMS alerts and mobile messaging systems for registered farmers and agro-input stakeholders, where feasible.

This revision strengthens risk communication by ensuring that regulatory decisions are timely, inclusive, and accessible to all stakeholders, particularly vulnerable rural farming communities.

3.3.10. Monitoring and Follow-Up

Observation 20

Section 3.3.10 outlines the objectives of monitoring and follow-up but does not clearly specify the actors responsible for conducting monitoring activities or the mechanisms through which stakeholders, particularly farmers, can participate in the process. Farmers and local communities are often the first to observe pesticide failure, pest resistance, poisoning incidents, environmental contamination, or other unintended effects arising from pesticide use.

The absence of participatory monitoring mechanisms may limit the timely detection, reporting, and management of pesticide-related risks, thereby reducing the effectiveness of post-registration surveillance.

Recommendation

Strengthen the monitoring and follow-up framework by incorporating participatory and multi-stakeholder monitoring mechanisms that facilitate community-based reporting, stakeholder engagement, and collaborative oversight of pesticide performance and safety.

Proposed Edit: Section 3.3.10 Monitoring and Follow-Up

Create paragraph 2 just below 3.3.10(c) to read as follows;

Monitoring and follow-up shall include:

- a. Community-based pesticide incident reporting mechanisms, including accessible toll-free reporting platforms and other appropriate channels for reporting pesticide-related concerns, adverse effects, product failure, pest resistance, or environmental impacts.
- b. Annual multi-stakeholder review meetings convened by the regulator and involving farmer representatives, civil society organizations, local government authorities, research institutions, registrants, and other relevant stakeholders to review monitoring findings and recommend appropriate actions.
- c. Joint monitoring and inspection exercises involving the regulator, local government authorities, and accredited civil society observers, where appropriate, to strengthen transparency, accountability, and stakeholder confidence in the post-registration review process.

3.3.11 Appeal

Observation 21

Section 3.3.11 does not provide a clear, accessible, and inclusive administrative appeal mechanism for farmers, farmer organizations, consumers, civil society organizations, or other stakeholders affected by post-registration review decisions. The current provision appears largely oriented towards registrants and adopts a highly legalistic approach, which may interrupt the technical flow of the guidelines and limit accessibility for non-legal stakeholders.

In addition, the section refers to a “*regulatory authority*,” yet this term is neither defined elsewhere in the guidelines nor expressly established under the current legal framework. This may create uncertainty regarding the institution mandated to receive and determine appeals.

Recommendation

Revise Section 3.3.11 to establish a clear, transparent, and accessible appeal mechanism for all stakeholders while aligning it with the institutional structures provided under the law. The section should clearly define appeal eligibility, grounds, timelines, procedures, and review processes. Detailed legal procedures may be referenced in an annex or applicable legislation.

Proposed Edits: Section 3.3.11 Appeal

3.3.11 Appeal

(a) Right of Appeal

Any registrant, authorized agent, farmer, farmer organization, consumer, community, civil society organization, or any other stakeholder materially affected by a post-registration review decision may appeal in writing to the Agrochemicals Tribunal within thirty (30) days of publication or receipt of the decision.

(b) Grounds for Appeal

An appeal may be based on one or more of the following grounds:

- i. Scientific or technical error in the assessment or decision-making process;
- ii. Procedural irregularity or failure to follow prescribed procedures;
- iii. Failure to consider relevant evidence, including locally generated data and stakeholder submissions;
- iv. Emergence of new scientific evidence;
- v. Violation of applicable legal or constitutional provisions.

(c) Appeal Process

The appeal shall clearly state the grounds for objection and be accompanied by any supporting evidence. The receiving authority shall acknowledge receipt of the appeal within fourteen (14) days.

Where the appellant faces literacy, language, disability, or other accessibility barriers, reasonable assistance shall be provided by a competent authority to facilitate submission of the appeal.

(d) Administrative Review

The Minister responsible for Agriculture shall appoint an Agrochemical Tribunal in accordance with the law to review appeals arising from post-registration review decisions. The Tribunal shall consider the appeal and issue a determination within sixty (60) days of receipt.

The Tribunal may:

- Confirm the original decision;
- Amend or vary the decision; or
- Reverse the decision.

(e) Judicial Appeal

Any party aggrieved by the decision of the Agrochemical Tribunal may appeal to the High Court of Uganda in accordance with applicable laws.

(f) Hearing and Determination

The Agrochemical Tribunal or the High Court, as applicable, shall hear and determine the appeal within sixty (60) days from the date of filing and may, where necessary, suspend implementation of the contested decision pending determination of the appeal.

Additional Recommendation

Delete references to the undefined ***“regulatory authority”*** throughout Section 3.3.11 and replace them with the appropriate legally recognized institution, namely the Agricultural Chemicals Review Committee, Agrochemical Tribunal, Minister responsible for Agriculture, or the High Court, as applicable. This will improve legal certainty, institutional clarity, and accessibility of the appeals process.

Observation 22 (Implementation Capacity, Coordination and Enforcement)

The guidelines assume that the Department responsible for Crop Inspection and Certification has adequate human resources, laboratory infrastructure, technical expertise, and financial resources to effectively undertake both scheduled and unscheduled post-registration reviews. Given existing institutional and resource constraints, this assumption may affect the timely and effective implementation of the guidelines.

In addition, the guidelines do not clearly define the lead coordinating authority responsible for implementation, inter-agency information-sharing arrangements, decision escalation pathways, and funding responsibilities. This may result in duplication of roles, weak coordination, and implementation gaps.

Further, while the guidelines provide for regulatory actions such as suspension, restriction, and deregistration of pesticides, they provide limited guidance on post-decision enforcement measures, including market withdrawal procedures, safe disposal and destruction of banned products, compliance monitoring, and measures to address illegal imports, counterfeit pesticides, and continued use of prohibited products.

Recommendation

Strengthen the implementation framework by:

1. Establishing a clear institutional coordination mechanism and identifying the lead department responsible for the implementation of the guidelines.
2. Introducing an implementation support and capacity-strengthening framework to address human resource, technical, laboratory, and financial gaps.
3. Providing for resource mobilization and partnerships with development partners and technical agencies.
4. Strengthening enforcement provisions to guide implementation of suspension, restriction, and deregistration decisions.
5. Clearly assigning implementation responsibilities under Annex 2.

Proposed Addition: New Section 3.3.12: Implementation Support and Coordination

The Department responsible for Agrochemicals Registration and Certification within the Ministry responsible for Agriculture shall serve as the lead coordinating authority for the implementation of these Guidelines and shall work closely with relevant government institutions, local governments, research institutions, development partners, civil society organizations, and the private sector.

Within twelve (12) months of the coming into force of these Guidelines, the Commissioner responsible for Crop Inspection and Certification shall:

- a. Conduct a comprehensive capacity needs assessment for post-registration review implementation, including human resources, laboratory infrastructure, surveillance systems, and financial requirements;
- b. Develop and operationalize a phased implementation plan prioritizing Highly Hazardous Pesticides, High-risk active ingredients, and pesticides of significant public health, environmental, or agricultural concern;
- c. Mobilize technical and financial support from development partners and relevant international organizations, including but not limited to the Food and Agriculture Organization (FAO), the World Health Organization (WHO), Centre for Agriculture and Bioscience International, research institutions, civil society organizations, regional bodies, and bilateral development partners;

- d. Build the capacity of District and Sub-County Agricultural Officers and other relevant stakeholders in pesticide monitoring, incident reporting, risk communication, and post-registration surveillance;
- e. Establish inter-institutional information-sharing and coordination mechanisms to facilitate implementation, regulatory decision-making, and enforcement actions;
- f. (f) Develop procedures for market withdrawal, recall, disposal, and environmentally sound destruction of suspended, restricted, or deregistered pesticide products;
- g. (g) Strengthen surveillance and enforcement measures to prevent illegal imports, counterfeit pesticides, and non-compliance with post-registration review decisions.

Proposed Edit on Annex 2 (Key Actors and Responsibilities)

Competent authority(DCIC); Add the following responsibility:

“Serve as the lead coordinating authority for the implementation of the Post-Registration Review Guidelines, including coordination of stakeholder engagement, information management, surveillance, enforcement, capacity development, resource mobilization, monitoring and evaluation, and reporting on implementation progress.”

Observation 23 (Transparency and Accountability in Scoring and Decision-Making)

The weighted scoring frameworks provided under Annex 3 and Annex 4 serve as critical decision-support tools that influence the prioritization of pesticides for review and the regulatory actions that follow. However, the guidelines do not provide clear procedures on how scores are assigned, documented, verified, or reviewed.

The absence of transparency requirements may create uncertainty regarding the evidence used, the rationale for assigned scores, and the process for resolving differences among assessors. This may undermine stakeholder confidence in the objectivity, consistency, and accountability of the post-registration review process.

Recommendation

Strengthen transparency and accountability within the scoring and prioritization framework by establishing mandatory documentation, evidence-tracking, review, and audit mechanisms for all scoring decisions.

Proposed Addition: Annex 3 (Weighted prioritization criteria)

Scoring Transparency and Accountability Requirements

To promote transparency, consistency, and evidence-based decision-making, all scoring and prioritization assessments shall comply with the following requirements:

- a. Each score assigned under the prioritization framework shall be supported by documented evidence, including references to scientific studies, incident reports, monitoring data, laboratory results, regulatory decisions, stakeholder submissions, or other relevant sources of information.
- b. Where multiple assessors assign differing scores for the same criterion, the final score shall be accompanied by a documented justification outlining the basis for the final determination and summarizing any differing technical opinions.
- c. All scoring worksheets, assessment summaries, and supporting documentation shall be maintained by the Ministry responsible for Agriculture and made available in accordance with applicable access to information laws and procedures within thirty (30) days of a final regulatory decision.
- d. The Ministry responsible for Agriculture shall conduct periodic independent reviews of scoring consistency and application of the prioritization framework. Such reviews may involve representatives from research institutions, academia, civil society organizations, and other relevant technical experts to promote transparency, accountability, and continuous improvement of the review process.

Observation 24 (Omission of Key Trade and Standards Institutions in Annex 2)

Annex 2 does not include the Uganda National Bureau of Standards (UNBS) and the Ministry of Trade, Industry and Cooperatives (MTIC) among the key actors responsible for implementation of the Post-Registration Review (PRR) Guidelines.

This omission creates a gap in the institutional framework given the critical roles these institutions play in standards development,

quality assurance, market surveillance, trade regulation, import and export controls, industrial compliance, consumer protection, and dissemination of trade-related information. Their participation is essential in ensuring that post-registration decisions are effectively implemented across the pesticide value chain and aligned with national, regional, and international trade and standards obligations.

Recommendation

Include the Ministry of Trade, Industry, and Cooperatives and the Uganda National Bureau of Standards as core stakeholders under Annex 2 and clearly define their roles and responsibilities in the implementation of the Post-Registration Review Guidelines.

Proposed Edit: Annex 2 (Key Actors and Obligations)

Add: Ministry of Trade, Industry and Cooperatives (MTIC)

Roles and Responsibilities

- Coordinate trade-related aspects of post-registration review decisions, including restrictions, suspensions, withdrawals, and deregistration of agricultural pesticides.
- Provide information and guidance on national, regional, and international trade obligations that may affect pesticide regulation, importation, exportation, manufacture, and distribution.
- Support market surveillance and enforcement efforts to prevent trade in restricted, suspended, counterfeit, or deregistered pesticide products.
- Facilitate stakeholder awareness, capacity building, and dissemination of trade intelligence, market opportunities, and emerging trends relevant to agricultural pesticides and agrochemical markets.
- Collaborate with relevant institutions in monitoring the impact of regulatory decisions on agricultural trade, competitiveness, and market access.

Add: Uganda National Bureau of Standards (UNBS)

Roles and Responsibilities

- Develop, review, and enforce relevant standards for agricultural pesticides, pesticide residues, packaging, labeling, storage, transportation, and disposal in accordance with national and international standards.

- Support post-registration review processes through quality assurance, conformity assessment, product testing, and standards verification activities.
- Conduct market surveillance and collaborate with enforcement agencies to identify and remove substandard, counterfeit, adulterated, or non-compliant pesticide products from the market.
- Provide technical guidance on standards compliance and support implementation of regulatory decisions arising from post-registration reviews.
- Collaborate with the Ministry responsible for Agriculture and other stakeholders in generating evidence on product quality and compliance to inform post-registration review decisions.

Observation 25

The guidelines place significant emphasis on chemical-based risk management approaches, with limited reference to preventive and sustainable pest management alternatives. In particular, there is insufficient integration of Integrated Pest Management (IPM), agroecological approaches, and structured pathways for the progressive substitution and phase-out of Highly Hazardous Pesticides (HHPs). This limits alignment with global best practices and Uganda's broader commitments under sustainable agriculture, the Sustainable Development Goals (SDGs), and relevant Food and Agriculture Organization (FAO) pesticide management frameworks.

Recommendations

Integrate explicit provisions promoting Integrated Pest Management (IPM), agroecological pest control methods, and a structured, risk-based pathway for the progressive substitution and phase-out of Highly Hazardous Pesticides (HHPs). This should be aligned with FAO guidelines, SDG targets on health, environment, and sustainable agriculture, and national agricultural transformation priorities.

Proposed Edits: Integration of Sustainable Pest Management Approaches

"The post-registration review system shall promote Integrated Pest Management (IPM), agroecological approaches, and other sustainable pest management strategies, and shall support the progressive identification, risk assessment, restriction, substitution, and phase-out of Highly Hazardous Pesticides (HHPs) in line with national priorities and international best practice frameworks, including those of the Food and Agriculture Organization (FAO)."

CSOs' ASKS AND PRAYERS TO THE MINISTRY OF AGRICULTURE, ANIMAL INDUSTRY AND FISHERIES

In the spirit of constructive engagement, partnership, and shared commitment to strengthening Uganda's pesticide regulatory framework, the participating Civil Society Organizations respectfully submit the following requests for consideration by the Ministry of Agriculture, Animal Industry, and Fisheries during the finalization of the Post-Registration Review Guidelines for Agricultural Pesticides:

1. Consideration and Incorporation of the Submitted Technical Proposals

We respectfully request the drafting team and the Ministry to critically review and, where appropriate, incorporate the technical observations, recommendations, and proposed edits contained in this submission. The proposals have been developed through a participatory, evidence-based, and multi-stakeholder process involving experts in food safety, public health, agriculture, environmental management, consumer protection, trade, human rights, and sustainable food systems. We believe that their incorporation will significantly strengthen the effectiveness, inclusiveness, transparency, and implementability of the final Guidelines.

2. Provision of Formal Feedback on Recommendations Not Incorporated

Recognizing that not all recommendations may be adopted in their entirety, we respectfully request the Ministry to provide us written feedback on any proposals that may not be incorporated into the final Guidelines. Such feedback would enhance transparency, promote mutual learning, clarify technical and policy considerations, and contribute to the continuous improvement of future regulatory processes.

3. Convening of a Stakeholder Validation and Feedback Meeting

We request the Ministry to organize a validation and feedback meeting involving the drafting team, relevant government institutions, civil society organizations, farmer representatives, academia, development partners, and other stakeholders. Such a forum would provide an opportunity to clarify issues arising from the review process, discuss areas requiring further technical consideration, build consensus on outstanding matters, and strengthen stakeholder ownership of the final Guidelines.

4. Institutionalization of Meaningful Multi-Stakeholder Participation

We respectfully urge the Ministry to institutionalize structured and continuous stakeholder engagement throughout the implementation of the Post-Registration Review framework, including participation in monitoring, surveillance, periodic reviews, public consultations, and evaluation processes. Sustained engagement will enhance transparency, accountability, evidence generation, and public confidence in pesticide regulatory decision-making.

5. Prioritization of Capacity Strengthening and Resource Mobilization

We request the Ministry to develop and operationalize a clear implementation roadmap accompanied by adequate investments in institutional capacity, laboratory infrastructure, surveillance systems, risk communication mechanisms, and enforcement capabilities. Strengthening implementation capacity will be critical to translating the objectives of the Guidelines into measurable public health, environmental, and agricultural outcomes.

6. Commitment to Transparency, Accountability, and Public Access to Information

We respectfully request the Ministry to establish mechanisms for regular publication of post-registration review decisions, supporting evidence, monitoring reports, stakeholder consultation outcomes, and implementation progress reports. Public access to information is essential for fostering trust, accountability, and informed stakeholder participation in pesticide governance.

7. Promotion of Safer and More Sustainable Pest Management Systems

We encourage the Ministry to utilize the Post-Registration Review process as a strategic opportunity to accelerate the promotion of Integrated Pest Management (IPM), agroecological approaches, safer alternatives to highly hazardous pesticides, and other sustainable pest management solutions that contribute to improved food safety, environmental protection, climate resilience, and agricultural sustainability.

OUR COMMITMENT AS CIVIL SOCIETY ORGANIZATIONS

The participating Civil Society Organizations reaffirm our unwavering commitment to supporting the Government of Uganda, particularly the Ministry of Agriculture, Animal Industry and Fisheries, in strengthening pesticide governance and promoting sustainable agricultural transformation.

Our commitment extends beyond the development of the Post-Registration Review Guidelines and encompasses the broader continuum of responsible agrochemical management, food safety, environmental protection, public health promotion, consumer protection, and the realization of the right to adequate food and nutrition for all Ugandans.

We commit to:

1. Continue providing evidence-based technical expertise and policy support to strengthen pesticide governance, food safety systems, and sustainable agricultural policies.
2. Support awareness creation, risk communication, and public education initiatives aimed at promoting the safe handling, use, storage, transportation, and disposal of agricultural pesticides.
3. Collaborate with government institutions, farmers, academia, development partners, the private sector, and other stakeholders in generating evidence, monitoring pesticide-related risks, and advancing informed regulatory decision-making.
4. Promote farmer-centered, consumer-responsive, and environmentally sustainable agricultural systems through advocacy for Integrated Pest Management (IPM), agroecological approaches, and safer alternatives to highly hazardous pesticides.
5. Contribute to strengthening transparency, accountability, stakeholder participation, and public oversight within pesticide regulatory processes and food system governance.
6. Support capacity-building efforts at national and local levels to enhance pesticide surveillance, incident reporting, food safety monitoring, and community participation in regulatory processes.
7. Remain a constructive and trusted partner in advancing policies, regulatory frameworks, and practical interventions that protect human health, safeguard the environment, strengthen food systems, and improve the livelihoods of farmers and consumers.

As Civil Society Organizations, we believe that achieving safe food, healthy communities, resilient ecosystems, and sustainable agricultural development requires collective responsibility and sustained collaboration among government, farmers, consumers, researchers, development partners, civil society, and the private sector. We therefore reaffirm our readiness to continue working alongside all stakeholders to advance a transparent, science-based, rights-responsive, and sustainable agrochemical governance system for Uganda.

CONCLUSION

The development of the Draft Post-Registration Review Guidelines for Agricultural Pesticides by MAAIF is a progressive and commendable step toward strengthening Uganda's pesticide regulatory system. The shift towards a structured, risk-based, and evidence-informed regulatory approach reflects an important advancement in national pesticide governance.

Civil society organizations acknowledge and appreciate the Government's commitment to improving pesticide safety, regulatory efficiency, and stakeholder participation. At the same time, this review identifies key areas requiring further strengthening to ensure that the final guidelines are fully responsive to public health concerns, environmental sustainability, gender equity, and the realities of smallholder agricultural systems.

The consolidated observations, recommendations, and proposed technical edits presented in this paper are intended to support MAAIF in finalizing a robust, transparent, and inclusive regulatory framework that effectively safeguards human health, protects the environment, and contributes to sustainable agricultural transformation in Uganda.



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