

BCI HHP Classification List

Update Process v.2.0

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1. Background and Context

BCI maintains a Highly Hazardous Pesticides (HHP) Classification List to support national teams, Implementing Partners, and farmers in identifying pesticides that pose significant risks to human health or the environment. The list is a critical tool for promoting safer crop protection practices and reducing reliance on dangerous chemicals in line with BCI Principles & Criteria.

This classification list draws on several internationally recognised sources and conventions to ensure alignment with global standards on chemical safety. Specifically, pesticides are flagged as HHPs in the BCI system if they meet one or more of the following criteria (criteria 3.3):

- **WHO recommended classification of pesticides by hazard:** Products classified as Class Ia (extremely hazardous) or Class Ib (highly hazardous) are prohibited
- **Stockholm Convention on Persistent Organic Pollutants (POPs):** Pesticides listed under this convention are banned due to their long-lasting persistence in the environment and bioaccumulative nature.
- **Rotterdam Convention on the Prior Informed Consent (PIC) Procedure:** This lists chemicals that are banned or severely restricted in at least two countries and require shared responsibility in international trade.
- **Montreal Protocol on Substances that Deplete the Ozone Layer:** Though not pesticide-specific, any pesticide listed under this convention (e.g. methyl bromide) is also flagged.
- **EU Classification under the Globally Harmonized System (EU GHS):** Used to flag substances with severe chronic health hazards classified as carcinogenic, mutagenic, or reproductive toxic (CMRs)
- **Pesticide Action Network (PAN) international list of HHPs:** BCI specifically references Group 3 of the PAN list to identify pesticides of high environmental concern, such as those with high persistence or toxicity to aquatic organisms and pollinators.

By referencing these frameworks, BCI ensures that the HHP Classification List reflects the most current and robust evidence on pesticide risk. This promotes consistency in how risks are evaluated across countries and helps drive alignment with global commitments to phase out the most harmful products in cotton production.

The List includes active ingredients reported by BCI farmers over the last season as well as nationally registered pesticides at country level.

This process aims at clarifying what are the different steps to update the BCI HHP list classification, roles and responsibilities and timing.

2. Process Objective:

The objective of this process is to define:

- How and when the BCI HHP Classification List table is reviewed, revised and updated, detailing roles and responsibilities and timeline.
- How and when the updated table is shared with Country teams
- Guidelines and clarification on when a new active ingredient is added to the updated list envisaging various scenario

3. Review process

No.	Responsible	Process Step	When
1.	BCI Standard Manager	• Send reminder to Capacity-Strengthening Coordinators that updated national pesticide registration lists should be submitted within 3 months.	Mid-July
2.	Implementation team – Designated Coordinator per country	• Collect updated lists of pesticides registered nationally for use on cotton. Highlight any new active ingredients not previously listed. Share with Standards Manager.	Mid-October
3.	MEL – Data analysis coordinator	• Collect Result Indicators on pesticide use and list all new active ingredients that have been reported by Better Cotton farmers • Communicate the updated RI master list to the Standard manager.	Early December Mid-December

4.	BCI Standard Manager	- Collect the updated versions of national lists from the country coordinators and extract any new active ingredient identified by country coordinators. - Share the new active ingredients extracted from the updated national list with the external pesticides expert so that he can check their status against BCI Hazard criteria - Share the RIR master list (new and existing active ingredients) with the external expert so that he assesses any relevant HHP classifications and toxic load indicator (TLI) scores.	End-October Early January
5.	Pesticide expert	- Confirm HHP classifications and calculate TLI scores for new and existing active Ingredients (AIs) on BCI RIR master list - Send back the updated master list to MEL data analysis staff - Review active ingredients extracted from updated national lists shared by the BCI Standard manager and check their status against hazard criteria - Assess if any new active ingredients is scheduled for consideration for inclusion under relevant convention annexes and classification lists - Consolidate the updated HHP Classification List by aggregating national list and RI master list - Develop country lists	Early January
6.	BCI Standard Manager	- Validate the lists before finalization through a joint review with MEL and Assurance teams - Complete the various lists: - Global master list - Country lists - Upload the final list to the internal platform (e.g. website/SharePoint) and inform Country Teams via a standard email about the changes, and creates a thread post.	

7.	Country team – Designated Coordinator per country	Share the updated BCI HHP Classification List with Programs Partners along with a summary of all changes and updates made	Early February
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4. New Active Ingredients addition frequency

New active ingredients may be added, coming through various channels, such as national pesticide registration lists submitted by country teams, Result Indicator data reported by farmers, or updates to internationally recognised reference lists. BCI reviews these inputs (as per the process detailed above) and assesses new active ingredients based on the HHP Criteria 3.3.

To ensure consistency and predictability, updates to the BCI HHP Classification List, whether triggered by changes to the WHO Recommended Classification of Pesticides by Hazard, the EU GHS system, the Stockholm and Rotterdam Conventions, the Montreal Protocol, or the Pesticide Action Network lists, will take place at two defined points within each P&C cycle: once during the formal Principles & Criteria (P&C) review process, and once in the interim period between two P&C reviews, hence broadly every 2,5 years.

This approach helps maintain scientific accuracy while avoiding overly frequent changes that could disrupt farmer guidance. It ensures timely responses to updated hazard classifications, while integrating major regulatory developments in a controlled, predictable manner.

Besides, where an active ingredient is newly added to the BCI HHP list, Programme Partners or Large Farms will have a two-season grace period to phase out the HHP in question. The grace period becomes effective from the start of the subsequent growing season in the country concerned.

5. Frequently Asked Questions

I. How do I know when a new active ingredient is added to the HHP Classification List that are annually updated (EU GHS, WHO)?

Every 2,5 years, BCI reviews updates to the WHO hazard classifications and the EU GHS system. Any active ingredients newly meeting BCI HHP criteria based on these sources are added to the HHP Classification List during the update cycle (typically finalised by end of January). Once the updated list is published, Country Teams are notified via email and the new version is uploaded on BCI SharePoint, the Thread and the knowledge Hub. A summary of changes is also provided to help you identify which active ingredients have been newly classified as HHPs. Country Coordinators are responsible for sharing this information with Program Partners.

II. What is the role of the external expert exactly? What does he assess?

The external pesticide expert plays a critical role in ensuring the scientific robustness and consistency of the BCI HHP Classification List. His main responsibility is to assess whether active ingredients meet one or more of the BCI HHP Criteria, based on internationally recognised hazard classifications and conventions. Specifically, he:

- Reviews new active ingredients identified in Result Indicator (RI) data or Nationally Registered Pesticide (NRP) lists.
- checks each active ingredient against the WHO hazard classification, EU GHS system, PAN International Group 3 list, and the annexes of the Stockholm, Rotterdam, and Montreal Conventions.
- determines if the substance qualifies as a Highly Hazardous Pesticide under BCI Principles and Criteria.
- Calculates the Toxic Load Indicator (TLI) score, where relevant, to support broader analysis of pesticide risks.

His assessments directly inform which active ingredients are added to or flagged in the HHP Classification List.

III. If an active ingredient is added/reclassified as WHO acute toxic categories / GHS acute toxic category (prohibited as per criterion 3.1), does it mean the pesticide is already prohibited for the ongoing season?

If an active ingredient is reclassified as prohibited as per the P&C, BCI defines a grace period to allow partners and producers sufficient time to research and adopt alternatives. SSI considers that some tolerance should be provided and set a grace period of 2 seasons, taking into consideration prevalence of use and availability of alternative.

IV. What happens for active ingredients that are considered for inclusion on the Rotterdam PIC list, but not yet formally added?

There are active ingredients that are pending decision from conventions to be included in their lists (Acetochlor or Paraquat for Rotterdam PICs). Conference of Parties are regularly taking place to decide their effective inclusion in the convention annex 3. Nevertheless, it is decided to include these active ingredients in the HHP list so that producers can start anticipating any effective bans.

However, if these AIs are in fact listed as PICs, SSI will define an appropriate grace period on an ad hoc basis.

V. Why aren't updates made immediately whenever a new hazardous pesticide is identified?

Frequent updates could cause confusion for farmers and Partners and lead to inconsistent guidance. To ensure clarity and stability, changes are integrated either annually (for WHO and EU GHS) or during formal revisions (for convention-related changes). However,

affected country teams should be notified as soon as possible to get prepared for the following season.

6. Files Location

The Master List and Nationally Registered Pesticide (NRP) lists are available on the Better Cotton Initiative website and the Knowledge Hub. These documents serve as key global references, providing consolidated information on active ingredients classification across different countries.