



Requirements to Sell, Manufacture or Commercialize Transgenics, Insecticides, Pesticides, Herbicides and Rodenticides

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1. **Is permission required from the government in order to plant, commercialize, import or export products that have been genetically modified or engineered ("GMOs")?**

According to rule 11 of the Pakistan Biosafety Rules, 2005 ("PBR") a license is required from the Pakistan Environmental Protection Agency ("EPA") for importing, exporting, selling, purchasing or trading living microorganisms, substances or cells or any product thereof, for any purpose. Rule 21 of the PBR states that genetically engineered microorganisms, cells or products thereof cannot be imported, sold or used except with the prior approval of the National Biosafety Committee.

2. **Is local presence required in order to be considered a duly registered distributor where the GMO is going to be imported and sold?**

None.

3. **Which governmental authorities are involved in the determination of the regulations involving GMOs (for example, food and agriculture, environmental, health, safety)?**

None. The Environmental Protection Agency (section 6 of the Pakistan Environmental Protection Act of 1997), the Institutional Biosafety Committee (rule 9 of the PBR), the National Biosafety Committee (rule 5 of the PBR) and the Technical Advisory Committee (rule 7 of the PBR).

4. **Are local performance and/or environmental safety studies required to obtain the permit to plant, commercialize, import or export GMOs, or are studies carried out in the country of origin of the GMO where it has already been certified, valid or accepted?**

The is no requirement that laboratory tests and field trials for the GMO sought to be planted, commercialized, imported or exported be conducted locally.

5. **Does the permission granted by the Government authorize the consumption of GMOs by human beings? Are there specific rules for the consumption of GMOs?**

There is no restriction on the commercialization of genetically modified products for human consumption once license under rule 11 of the PBR with respect to the same has been secured. Further, there are no specific rules governing the consumption of GMO's by human beings.

6. **Is governmental permission required for foreign companies to commercialize, import or export pesticides, insecticides, rodenticides and/or their consumables?**

Any person intending to import, manufacture, formulate, sell, offer for sale, hold in stock for sale or in any manner advertise any brand of pesticide is required by section 4 of the Agricultural Pesticides Ordinance of 1971 ("APO") to register the same with the Government. According to the Import Policy Order 2008 raw materials for the production of pesticides are importable by industrial users only.

There are no restrictions on the export of pesticides or their consumables.

7. **Is local presence required in order to be a registered or authorized distributor where the pesticides, insecticides, rodenticides and/or their consumables are going to be imported and sold?**

Yes, according to sub-section 5 (3) of the APO a local agent or representative is required where a person not domiciled in Pakistan seeks to effectuate the registration of a pesticide, as defined in the APO.

8. **Which governmental authorities are involved in the determination of the environmental health and safety of pesticides, insecticides, rodenticides?**

Environmental Protection Agency (rule 4 (3) of the Agricultural Pesticides Rules 1971), Food, Agriculture and Livestock Division (section 5 of the APO, Rule 3 (3) of the Rules of Business 1973 and para 12 (15) of Schedule II there under), Department of Plant Protection (Rule 4 (4) of the Rules of Business of 1973 and para 39 of Schedule III there under) and Agricultural Pesticides Technical Advisory Committee (section 12 of the APO).

- 9. Are local performance and/or environmental safety studies required to obtain the authorization to market pesticides, plaguicides, rodenticides, insecticides, or are studies carried out in the country of origin of the products, valid or accepted?**

Local performance of environmental safety tests is not required to be conducted by the persons registering a pesticide, and results of tests conducted outside Pakistan may be submitted. However, the Federal Government will conduct tests locally on the sample of the pesticide provided with the application for its registration when processing such application for registration.

- 10. Is a prescription by a qualified professional required in the herbicides commercialization? If the answer is "YES", what is the professional that grants such prescription?**

None.