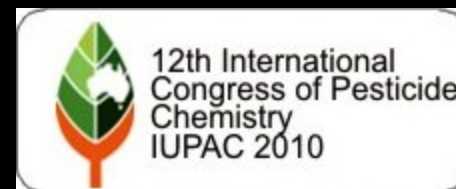


SECONDARY RESIDUE STANDARDS and the minor crop issue

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Contents

- Secondary standards
- Secondary residue standards – SRS
- SRS vs Official/Multilateral regulations and guidelines
- SRS and the minor crop issue
- Need for a dialog
- Alternatives to meet SRS



Secondary standards

- Is the way in which retailers try to respond to consumer's needs / expectations



Driving factors for the development of secondary standards

- To provide brand protection
 - Image and liability
- To promote business improvement and efficiency
- To assure product safety
 - Food safety is a must
- Eventually, to meet regulatory requirements
 - HACCP, GMP
- To promote consumer confidence
 - Consumer driven



Pesticides secondary standards are mostly

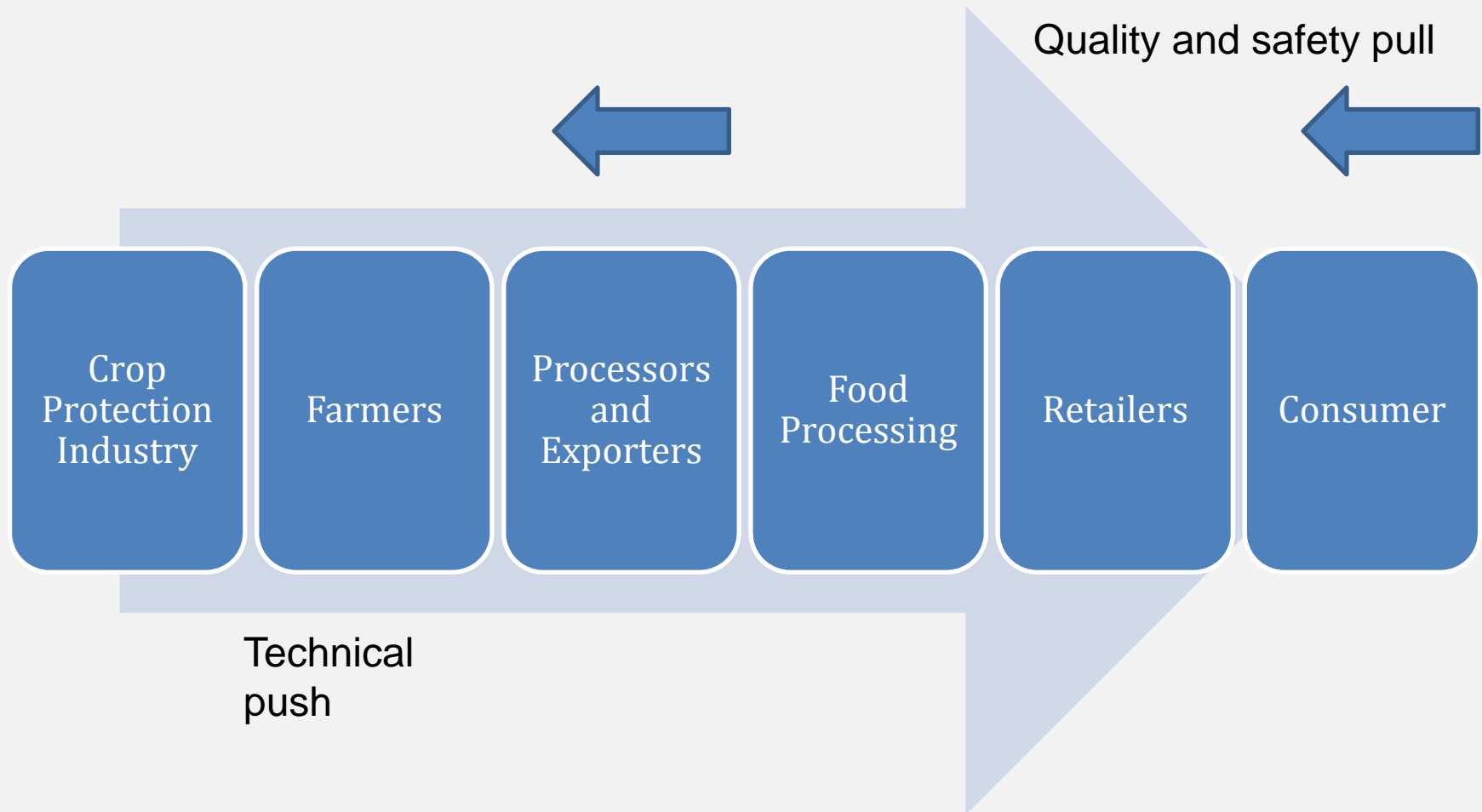
- Quality Assurance Systems – Eg. GLOBALGAP
- Residue requirements
 - Residue requirements at non detectable levels
 - Adoption of MRL values between 50% and 80% of legal ones
- Retailers Private Lists
 - Approved and not approved active ingredients

Consumer

- As the final customer has a strong position
- Reactions are inconsistent and not understandable but he decides what he wants to have and the farmer has to produce
- Activates the retailers pull to quality and safety on the food chain

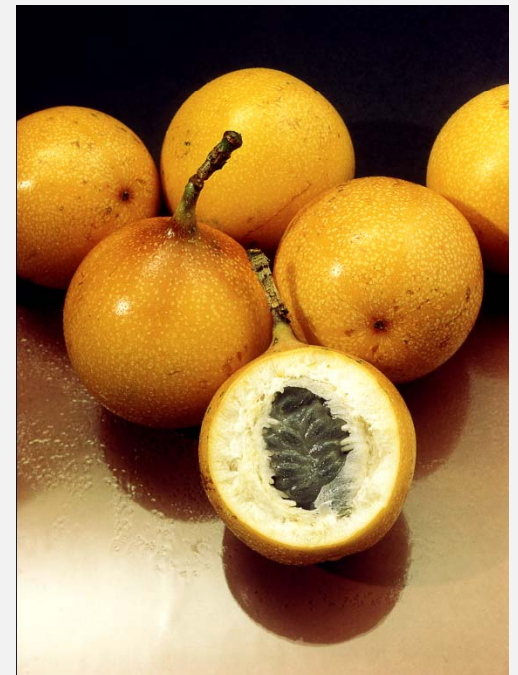


Food Value Chain power shift



Unfortunately, secondary standards

- Are not established following principles and guidelines that rule trade between countries
 - Doing away with huge efforts made in developing regulations



Key provisions contained in SPS & TBT Agreements

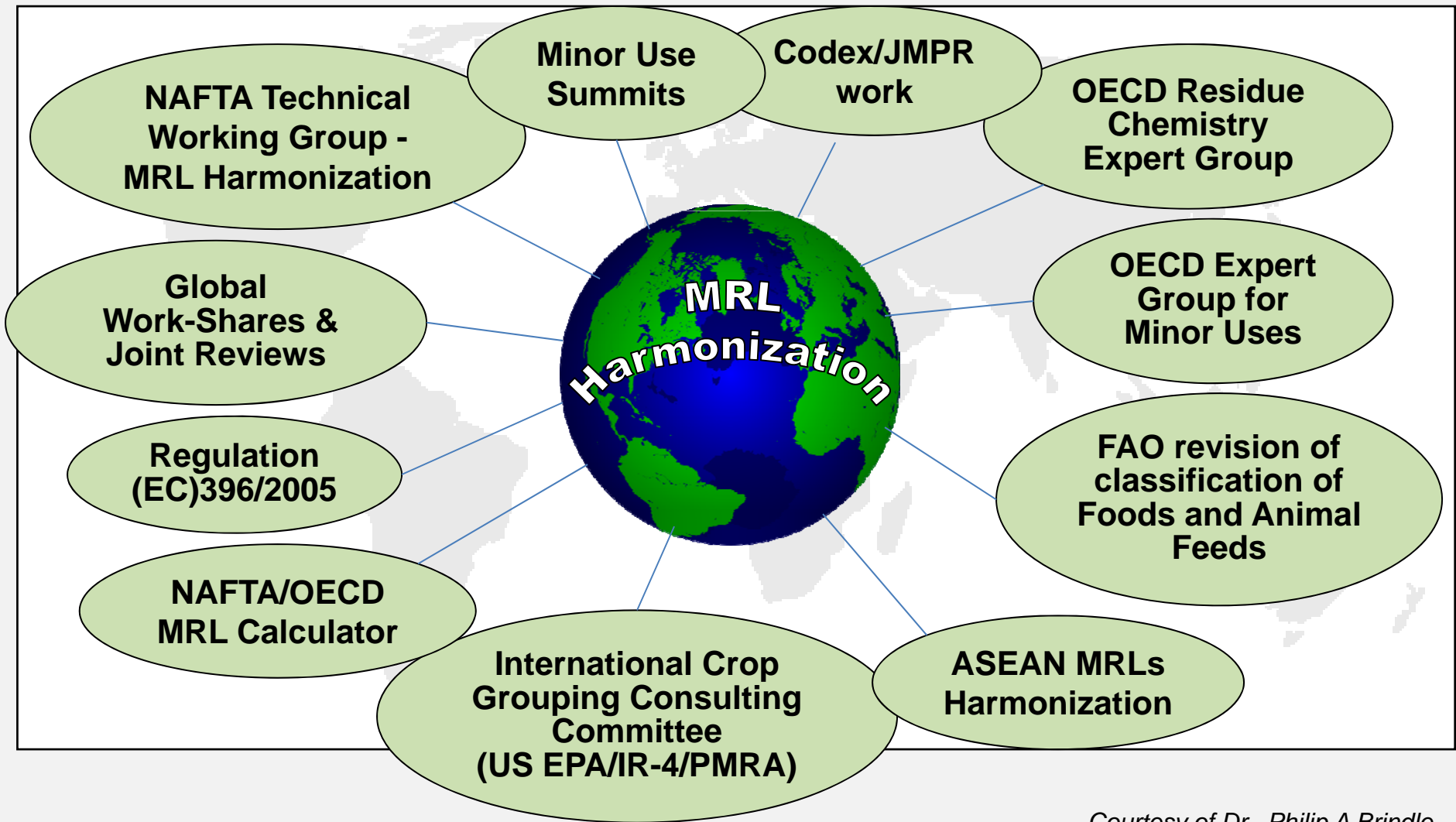
- Risk based
- Science based
- Transparency
- Harmonization – conform with international standards
- Not more stringent than necessary
- Non discriminatory
- Preventive of deceptive practices
- Take account of special needs of developing countries



Official regulations

- Generally observe those principles
- Are discussed in international scenarios before release
 - Codex Alimentarius
 - IPPC
 - WTO
- Registration process provides the basis for produce safety
 - Safety is finally determined by the farmer

International efforts underway



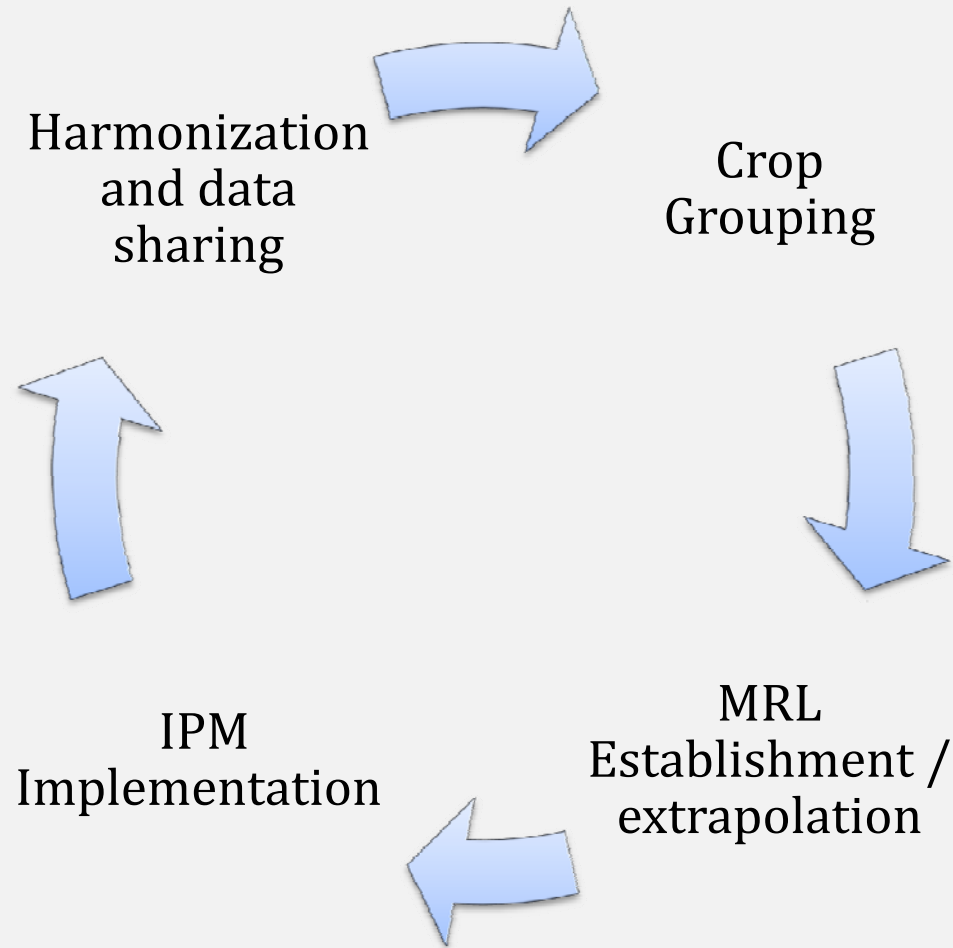
Courtesy of Dr.. Philip A Brindle

The minor crop issue

- Entails additional efforts regarding harmonization and risk/scientific base



Minor Use Strategy



Secondary residue standards – SRS

- Seem to follow/Promote the idea...
 - Agrochemicals must phase out of primary production
 - Eurepgap origins
 - Which is not necessarily the best option
 - There is still a lot to know about biopesticides to use them safely
- Try to make food safety a competitiveness factor
 - Pushing the MRLs (not FS stds) to extremely low values and even prohibiting agrochemicals following not clear/international accepted methodologies
 - New methodologies are not required now

Example Private Policies

- Marks and Spencer
 - Is committed to phase out pesticides identified as hazardous by the Pesticide Action Network
 - Plans to eliminate the use of 10 pesticides by 2012
 - Currently requires this growers to notify if they use any of 38 other substances
 - Has a goal of making 75% of all fruits and vegetables residue-free by 2015 and 100% residue free by 2020
 - Launching a pesticide residue reduction network with Marks & Spencer suppliers
- MRL values LIDL Germany
 - Maximum allowable amount is 80% of legal MRL

Secondary residue standards

- Crowd out smallholders
- Could be adding unnecessary costs
- Might affect efficacy of pest control and crop yield by reducing GAP
- Not necessarily mean a better price



SRS

- Undercut national standards
- EU Regulation 2009 – Harmonization effort
 - Recognizes minor uses
 - Harmonization of MRLs between countries
 - Retailer's secondary standards ignore this effort



SRS and the minor crop issue

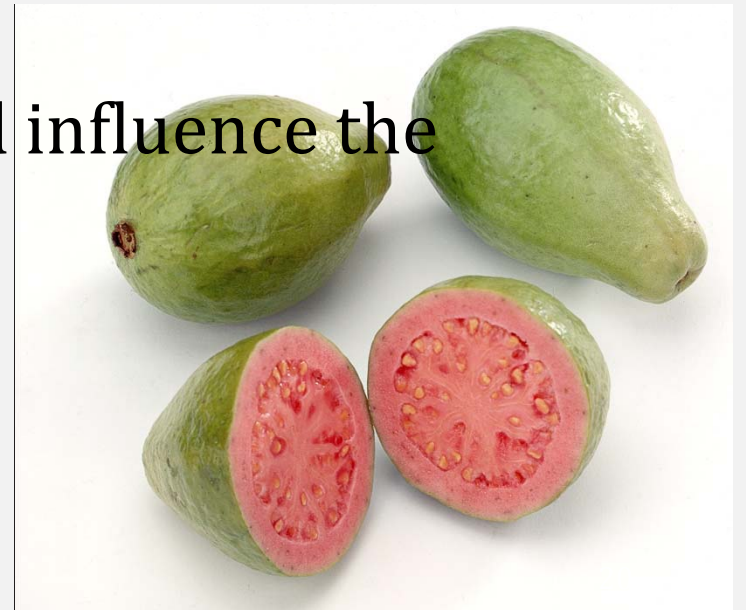
- Secondary Standards cannot distract from solution to Minor Crop issue
 - Minor Crops need to be recognized and included in global standards lists
 - Crop grouping needs harmonization through standards
 - Crop groups need representative crops – Codex designated in 2010 for 8 groups
 - Regulatory processes must contemplate extrapolation from major to minor crops
 - Continue global data generation initiatives

There is a need for dialogue



There is a need for dialogue

- Will to communicate
 - Advantages of privileged position
- Educate retailer's, decision makers and procurement officers in joint efforts on basic MRL concepts
- Try to educate, understand and influence the consumer

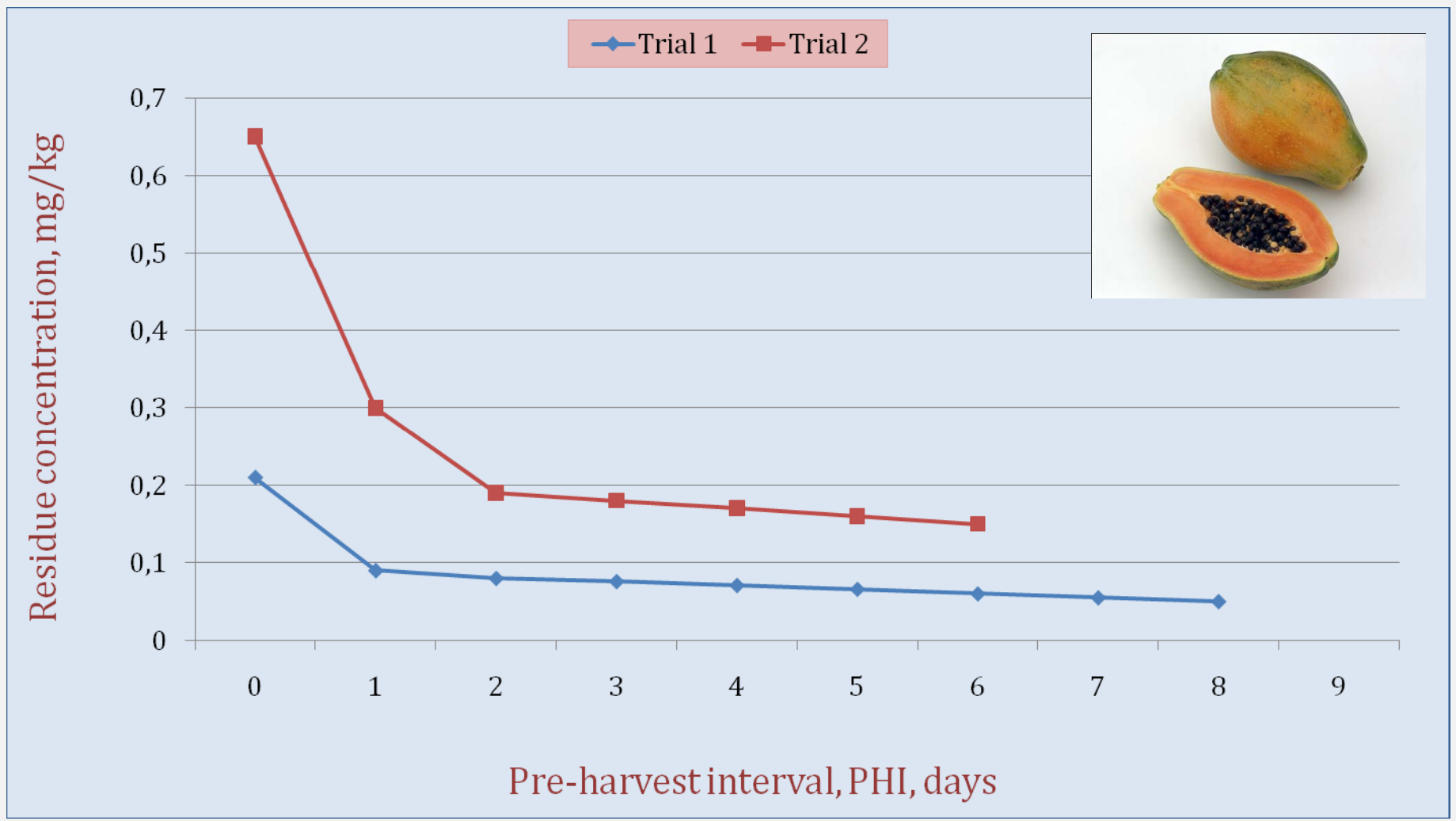


There are alternatives to meet SRS

- Elimination of SS (in general) is a hard nut to crack
 - They are here to stay or, at least, they will last long enough



Residue decline curves



Closing remarks

- Minor crop issue is complicated enough
- SRS are an additional trade barrier
- Global efforts and resources for MRL harmonization are being wasted if SRS prevail
- These issues must be addressed seriously
- Are SRS maintained during supply shortage?



Many thanks to

- Jerry Baron
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