MRL work shop – San Francisco 30th May 2018

Peeters Luc External relations



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- State of play Al's / PPP's in the EU
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- Conclusions



Facts & Figures





BelOrta in figures: 2017

400Affiliated buyers

439 M€ Turnover F&V **650 mio** items or kg sold

product groups, conventionel and organic

+ 170

1200 active producers

370 employes

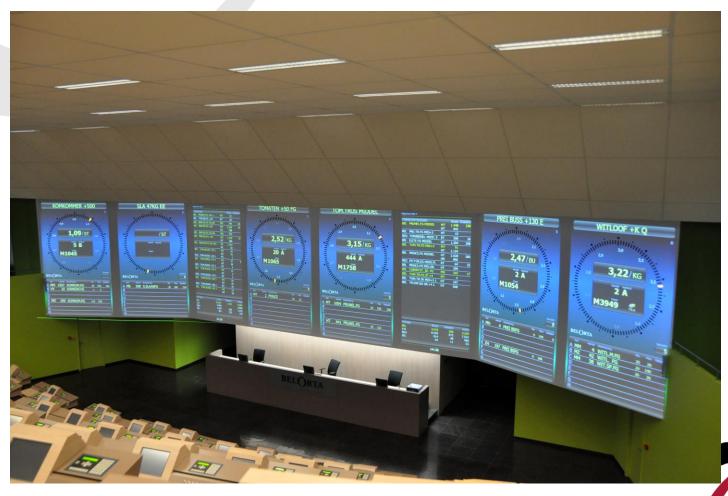
Export to 75
Countries



Auction room

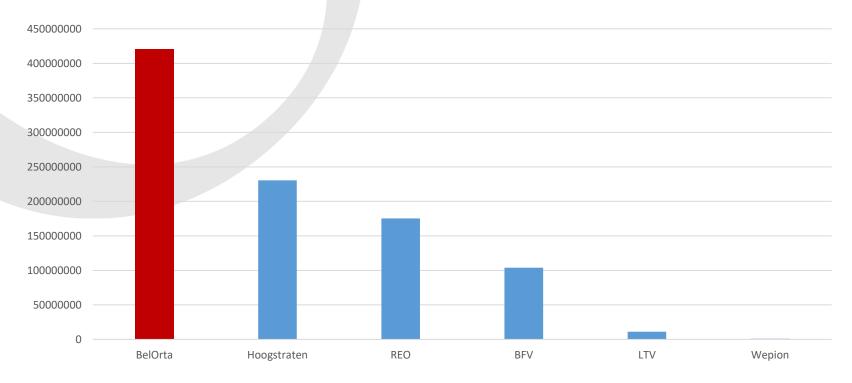
Third generation – hybrid – projection

E-commerce: connection world wide



BEL ORTA

Belgian F & V coops (2017)



- 90 % of market in vegetables
- 60 % of market in fruits



Production share BelOrta / VBT Belgium





Our markets



Export 55% volume

In collaboration with dedicated exporters and traders Export support in-house office of FASFC COP – COD compliance of MRL's

Belgium 45% volume

F1 + F2 80% Wholesale and private 20%





State of play Al's/PPP in the EU



European legislative framework (I)

└ Official regulatory framework

Regulation 1107/2009 concerning the placing of plant protection products on the market → Too restrictive

• New active substances (February 2017, ECPA)

• 49 new substances submitted since June 2011

• 19 active substances have an Approval vote

• 17 have also an MRL vote

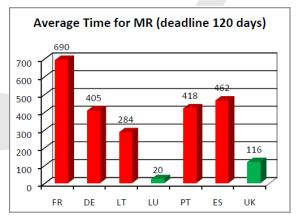
• 15 have MRL regulations

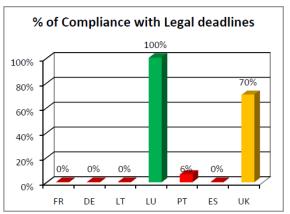
• 5 Product authorized



European legislative framework (II)

Zonal system and Mutual recognition





Outcome of re-evaluation by second MS during MR application:

- ✓ Authorisation with identical conditions 56%
- ✓ Authorisation with different risk mitigation 27%
- ✓ Authorisation not possible 6%

Conclusion: Re-evaluation does NOT add value

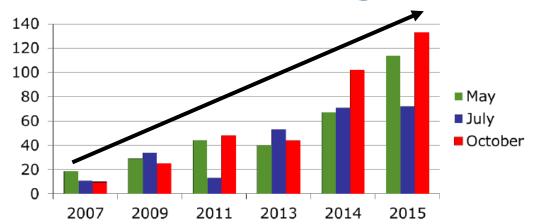


European legislative framework (III)

Emergency authorizations



Numbers of emergency authorisations notified at PAFF meetings

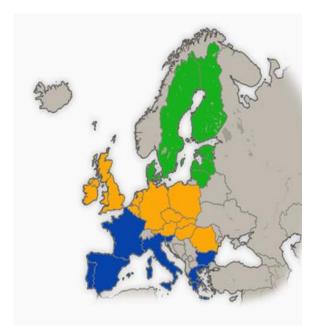




European legislative framework (IV)

Effects on minor uses and specialty crops depend on:

- how the zonal system works in practice
- how mutual recognition is applied





European legislative framework (V)

EU legislation: added value

- Harmonization (guidelines and interpretation, i.e. CfS, MUSC, ...)
- Risk assessment (EFSA)
- Single zone for MRL → Single market and trade
- Minor Uses Coordination Facility



MINOR USES TABLE OF NEEDS

WORK PROGRAMMES

NATIONAL CROPS ACREAGES TABLE

HOME

LOGIN

EUMUDA European Minor Uses Database

EU Minor Uses EUMUDA Database - Home page

WELCOME to the European Union Minor Uses Database EUMUDA!



State of play on MRL's



State of play on MRL's in the EU (I)

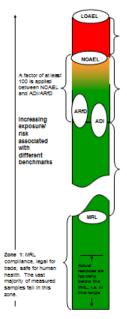
MRLs

- ALARA principle + GAP
- For different climatic conditions

EU added value

- Science based: risk assessment (EFSA)
- Single EU MRL → Single market and trade
- Harmonization (guidelines and interpretation)
- Minor Use Coordination Facility

Simplified Schematic Showing the Wide Safety Margins Used in the MRL Setting Process



Zone 4: NOAEL is exceeded, meaning there is a human health concern. Immediate steps to prevent the sale of the croo/commodity have to be taken

Zone 3: ADI and/or ARTO are significantly exceeded, meaning there may be a human health concern. Given the safety mergins incorporated into the ADI and ARTO, case-by-case assessment is appropriate, and if necessary steps to prevent the sale of the concilionmonthly should be taken.

Zone 2: MRL exceedance, not legal for trade but safe for human health. Case-by-case analysis and appropriate steps to ensure future compilance with MRLs should be undertaken.

Explanations

- MRL: Maximum Residue Level (Maximum contents of a pestidio residue to be legally permitted in or on food commodities)

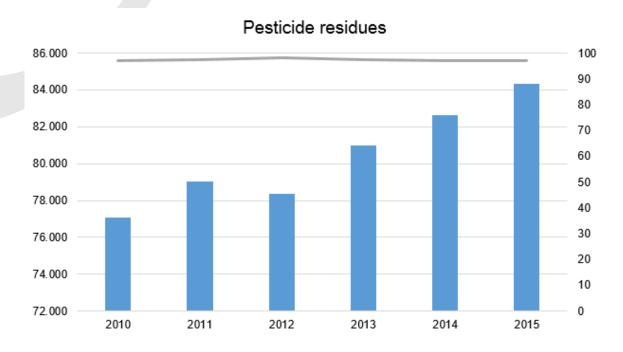
 ADI: Acceptable Dally Intake (Estimate of the amount of a substance in food, which can be incested dally over a lifetime by numaris
- Without apprediable health risk)
 ARID: Acute Reference Dose (Estimate of the amount of a substance in food, which can be ingested in a single meal by humans without
- appreciable health risk)

 NOAEL: No Observable Adverse Effect Level (The greatest concentration of anagent, that causes no detectable adverse attention of morphology, functional capacity, growth, development or lifespan of the target.
- LOAEL: Lowest Observable Adverse Effect Level (similar to NOAEL, but where an effect is seen)



State of play on MRL's in the EU (II)

EFSA reports on pesticide residues



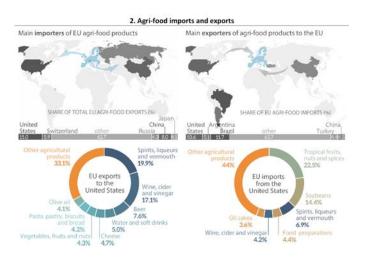
Level of compliance above 97%

Non compliances: EU: ±1,5% vs third countries: ±6,5% (on average)

State of play on MRL's in the EU (III)

Link to Plant Protection Products

- ✓ Minor Uses and Specialty Crops : = " orphan " crops
- ✓ High safety standards (both environment and health): less availability of active substances for EU farmers
- ✓ Uneven playing field in relation to third countries : Set import tolerances at LOD for banned active substances
- ✓ No official response towards secondary standards





State of play on MRL's in the EU (III)

MRL for non-pesticide products

" contamination" within the food chain:
biocides not longer considered as PPP:
e.g. chlorate from tap water on lettuce

✓ contaminants present in inputs:

perchlorate coming from imported fertilizer

✓ Heavy burden for farmers affected by these cross- contaminations: resulting in redraw from market closure of farm

RAPPEL DE PRODUIT

09/06/2017

Rappel de Delhaize

Rappel de la salade de blé courte (125g).

Problématique : Taux trop important de perchlorate

Delhaize demande à ses clients de ramener à leur magasin la salade de blé courte (125g). Le rappel concerne 1 lot portant le numéro B321Y0000A et dont la date d'emballage est le 29/05/2017.

Suite à des analyses de qualité menée sur ce produit, un taux trop important de perchlorate a été détecté
Le produit est préemballé dans un ravier en plastique. La toxicité aigüe et orale du perchlorate est très
faible. Seul une exposition chronique au perchlorate peut présenter un risque pour la santé.

Ce produit de ce lot spécifique a été rappelé en concertation avec l'AFSCA.

Les autres produits de la gamme ne sont pas impactés.

Delhaize a entretemps retiré tous ces produits de ses rayons. Il est demandé aux clients qui ont acheté ces produits de ne pas les consommer et de les ramener dans un magasin Delhaize.

Info produit:

Nom : salade de blé courte (125 gr)

Marque : Delhaize

EAN code : 5400112301807 Numéro de lot: B321Y0000A Date d'emballage : 29/05/2017

Conseils et informations destinés aux consommateurs :

Que faire si vous avez déjà acheté le produit ?

Ne pas consommer le produit et le ramener dans un magasin Delhaize où il sera remboursé.

Pour de plus amples informations, les clients peuvent s'adresser à notre service Clients au numéro





Secondary / private standards in the EU



Secondary/private standards in the EU (I)

Ingredients of secondary standards cocktail

- ✓ Black listing by retailers of approved PPP's
- ✓ MRL levels lower then legal MRL: e.g. 75 %; 66 %, 33 %
- ✓ Sum of MRL's lower then threshold: e.g. 80%
- ✓ Limited number of Al's: maximum of 2, 3, 5 Al's
- ✓ AFfD lower then agreed calculator



Secondary/private standards in the EU (II)

Some examples (without responsibility nor garanty of editor)

Retailer	Logo	Country	Max % MRL	Max Sum % MRL	Max.% ARfD	Max.sum % ARfD	Max. nr of Al's/ sample	Black list
ALDI	Labor Labor	AU, BE, DE, FR, NL	70	80	80	80	3-5	Y
LIDL	I ÷ D L	BE, DE, FR, NL	33,3	80	100	Not specified	5	
REWE	REWE	DE	70 % (50% own brands)	100% own brands	70 %	Not specified	5	Y
METRO	METRO	DE	70%	Not specified	Not specified	Not specified	5	
	METRO	ES	100%	100%	100%	100%	Not specified	
Albert Heyn	ch	BE, NL	50% of EU MRL	Not specified	50% of NL ARfD	Not specified	Not specified	
Carrefour	Carrefour	BE, FR	100%	Not specified	Not specified	Not specified	Not specified	

Secondary/private standards in the EU (III)

Comments coming from MS and EU competent authorities

- ✓ Commercial contract between parties
- ✓ Protection of consumers not lower then legal limit

Comments coming from retail

- ✓ Improved protection of consumers (not a marketing tool yet)
- ✓ Avoid public exposure with food safety issues

(rationale: ISO 17025 for labs with Z = 2)

- ✓ Protection of environment : less pesticides
- ✓ Economic argument : less input for growers



Secondary/private standards in the EU(IV)

Comments coming from growers

- ✓ Demonstrating lack of confidence in the legal system
- ✓ Narrowing growers toolbox even more
- ✓ Problems in resistance management : lower dosages
- ✓ Supply lines very confusing : which consignment to who
- ✓ Leading to more food waste



Conclusions



Conclusions (I)

- ✓ EU consumers are widely protected to dietary exposure to PPP's
- ✓ EU regulatory is very conservative in placing AI/PPP on the market
- ✓ EU farmers and agri-cooperatives have a very high level of compliance including COP COD
- ✓ EU farmers need a reliable and stable system for MRL setting
- ✓ Coherence among different pieces of legislation (fertilizers, PPP's,) not yet in place
- ✓ Establish even playing field: avoid trade disruptions (EU and non-EU)
- ✓ Build trust in the legal system : do not leave it to the market with secondary standards



Enjoy the fruits & vegs from European horticulture!







Thank you very much for your kind attention!



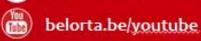


Bedankt voor uw aandacht. Volg ons op:





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