



# Secondary Standards Today

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Classification: Public

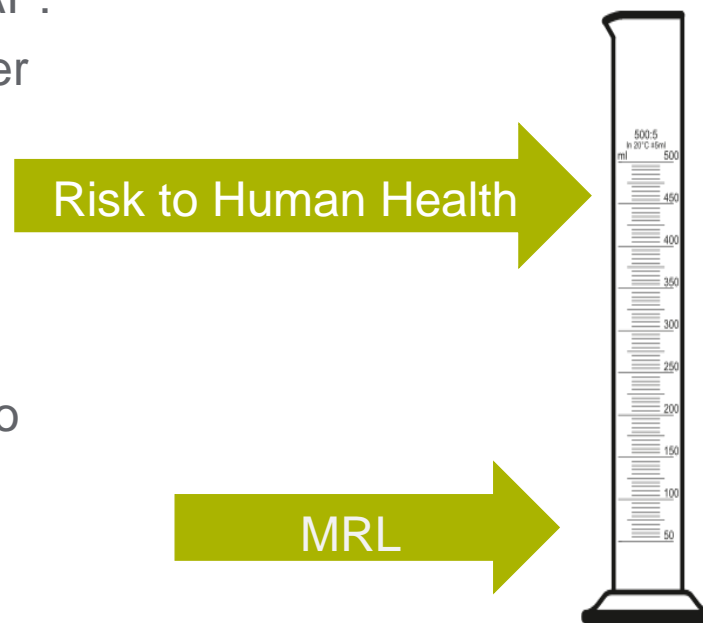
# Overview

- I. What are they?
  - MRLs & Benefits of MRLs
  - Secondary Standards
    - What they are not
    - Benefits
    - Who is Establishing
- II. Segment Engagement
- III. Future for Secondary Standards
- IV. Further Consideration
- V. Impact of Secondary Standards



## What is an MRL?

- ❑ Maximum residue level legally allowed for a defined chemical/crop combination. Based on residue trials conducted at the good agricultural practice (GAP) required to combat the insect, weed or disease effectively.
- ❑ Residue trials are conducted at the critical GAP:
  - maximum application rate and number
  - Specific timing of application
  - Minimum spray interval between application
  - Shortest pre-harvest interval (PHI)
- ❑ Set far below levels that could pose any risk to human health



**Residue data is the basis for MRL setting**

# Benefits of MRLs

- ❑ Promotes fair trade among countries regardless of their stage of development
- ❑ Science based
- ❑ Risk based
- ❑ Transparent
- ❑ Opportunities to harmonize with international standards; important to developing countries



## What is a Secondary Standard?

- ❑ Retailer private residue level, often set at 50 to 80% of legal requirement. They are used by retailers, predominately in Europe, to promote brand image and satisfy consumer perceived safety concerns
- ❑ Secondary Standards are:
  - Market place response to consumer expectations
  - Based on marketing not trade rules between countries
  - Inconsistent & capricious; vary among retailers
- ❑ Not based on principles and guidelines of trade between countries (WTO, Codex)
- ❑ Undercuts national standards based on science requirements and regulations
- ❑ Likely to increase resistance; reducing the GAP will have an impact on crop yield and pest control.



# What Secondary Standards Are Not

## They're not:

- Based on science
- Based on trade
- Established by a regulatory authority
- An indication of safety or health
- Enforceable by state or Federal regulatory authorities

## Perceived Benefits of Secondary Standard

- Protect brand image and liability
- Promote consumer confidence
- Increasing grower awareness of residues
- Starts a dialogue and stress the value of education
- Allow retailer to charge more for commodity



# Who is Establishing Secondary Standards?

- ❑ Retail - business marketing tool
  - Appeals to consumer perception of healthy food
  - Increase costs to consumer
  - Increases retailer profits



- ❑ Processor, shipper/packers - restrictions beyond the registered use
  - do not use lists
  - use pattern may be more restrictive than the label
  - maximum number of pesticides

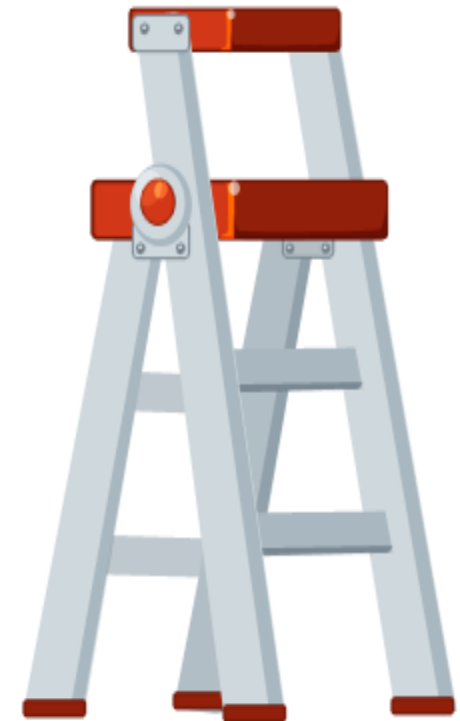


# Segment Engagement

Segment	Issues
6. Customer	Impact by scares (benzene/Perrier, melamine/milk, E.coli/spinach), media field day promoting fear, NGO encouragement, fascination with agriculture
5. Retailer	External pressure to satisfy perception: hyper-local sourcing <sup>1</sup> , transparency in safety
4. Processor, shipper/handler	<ul style="list-style-type: none"> <li>consumable product must be perceived as healthy, natural, local, desirable</li> <li>meeting domestic demand and requirements in export markets</li> </ul>
3. Regulators	Doing complex assessments/reviews meeting laws and ensuring proper protection of environment
2. Crop Protection Industry	tools to help grower, conduct numerous complex studies must meet regulatory requirements
1. Grower	nature, pest pressure, compliance with Federal & state regulations



Satisfy customer



# The Future of Secondary Standards

- UK
  - Best practices, residue reduction, meeting legal requirements
- Rest of Europe –
  - escalation of demands, more attention on levels below 0.01mg/kg? Fewer number of actives allowed. Residues in other commodities, flowers/clothes?
- Processors -
  - Global companies, consistency across supply chain. Residue reduction. Attention on multiple residues?



Whether what is happening in Europe will happen to the same extent in the USA, is hard to say

- Supermarkets establish “gatekeeper” role, requiring assurance of claims
- Customers are demanding “healthier” “natural”, local foods

## Further considerations

- Growers produce food to most demanding conditions (flexibility of market) – if able
- More grower monitoring – sufficient number of good analytical labs available?
- Post harvest treatments difficult
- Residue concerns relative to water or carbon footprint?



## Impacts of secondary standards



May help growers meet international standards allowing access to a wider market

Can promote best practices

Protect brand image

Can result in a price premium for growers

Promote consumer confidence; increase demand for the commodity or product

Costs often carried by grower

The number and complexity of standards is confusing

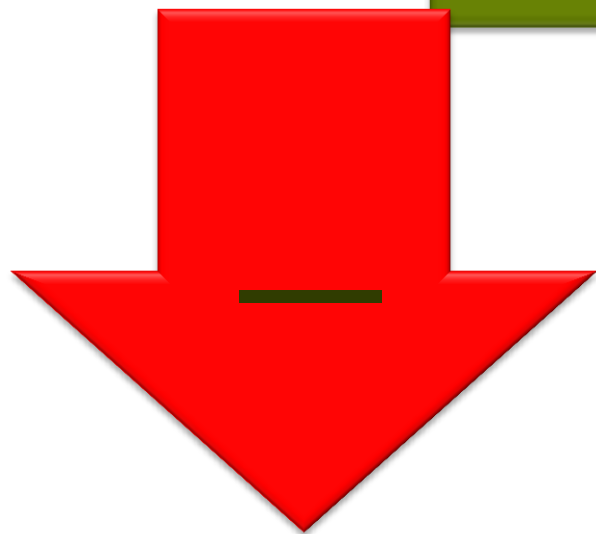
Not science based and reduces public confidence in regulation

Could reduce crop yield and quality

Increases risk of pest and disease resistance

Lack external transparency

Try to make apparent food safety a competitiveness factor



*Courtesy of Caroline Willetts*



**THANK  
YOU**

## sources

1. <http://www.newswise.com/articles/view/601840>

# Comparison

Factors	MRLs	Secondary Standards
Data requirements	Labeled use, residue trials	none
Enforcement	Established methodology, widely available	May be advanced methodology
Costs to establish	Residue studies range from \$50 to 250K	None
Benefits	Transparent, science & risk based, consistent with international standards	Increase profits for retailer
Meeting numbers/levels	Achievable	Off labeled use/unknown