



EUFRUIT NETWORK



Aarhus University -Department of Food Science

23 May 2018

Agenda

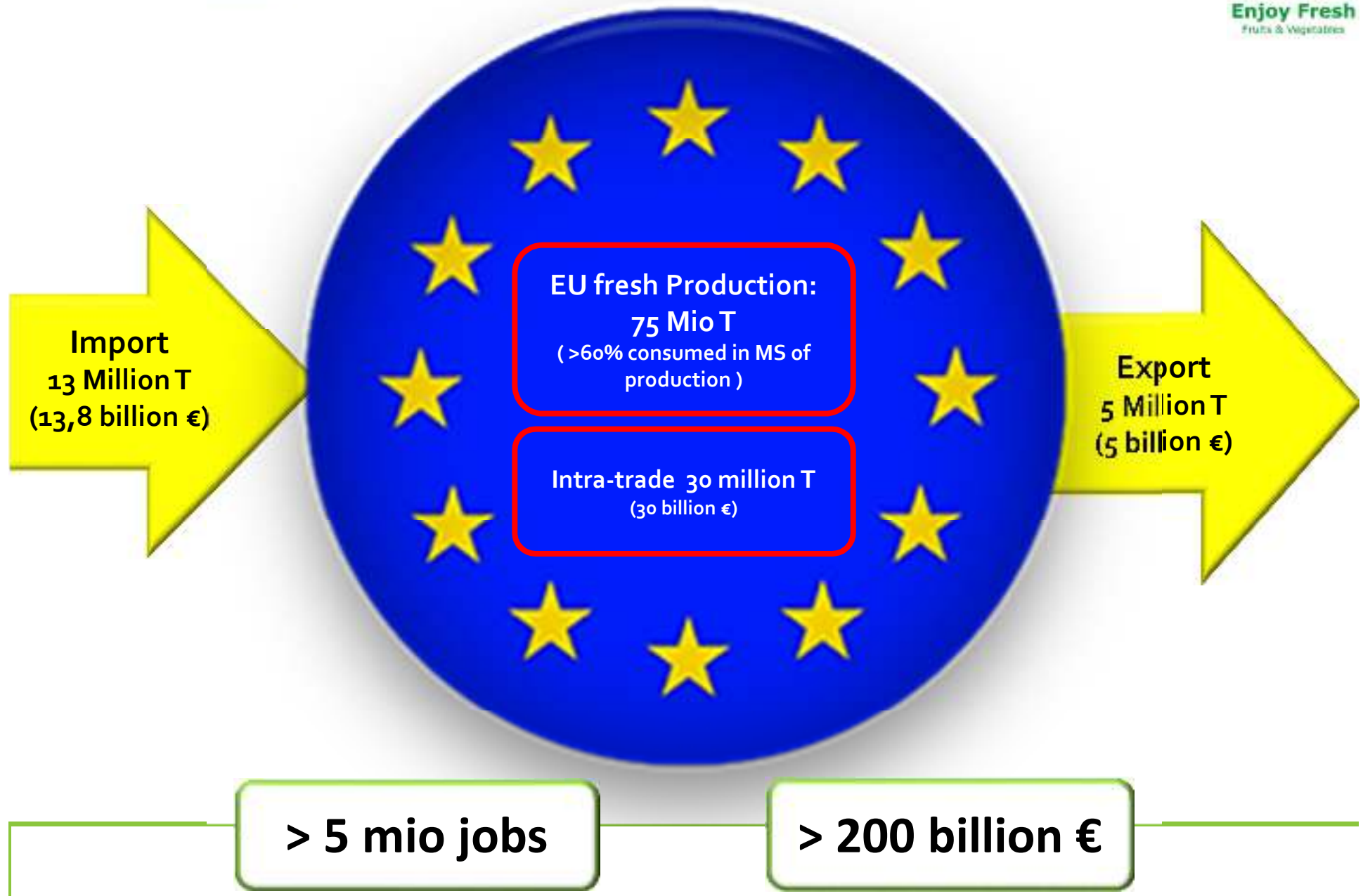
- Fresh produce data & perceptions
- Challenges in regards to PPPs and MRLs
- Opportunities and recommendations
- REFIT





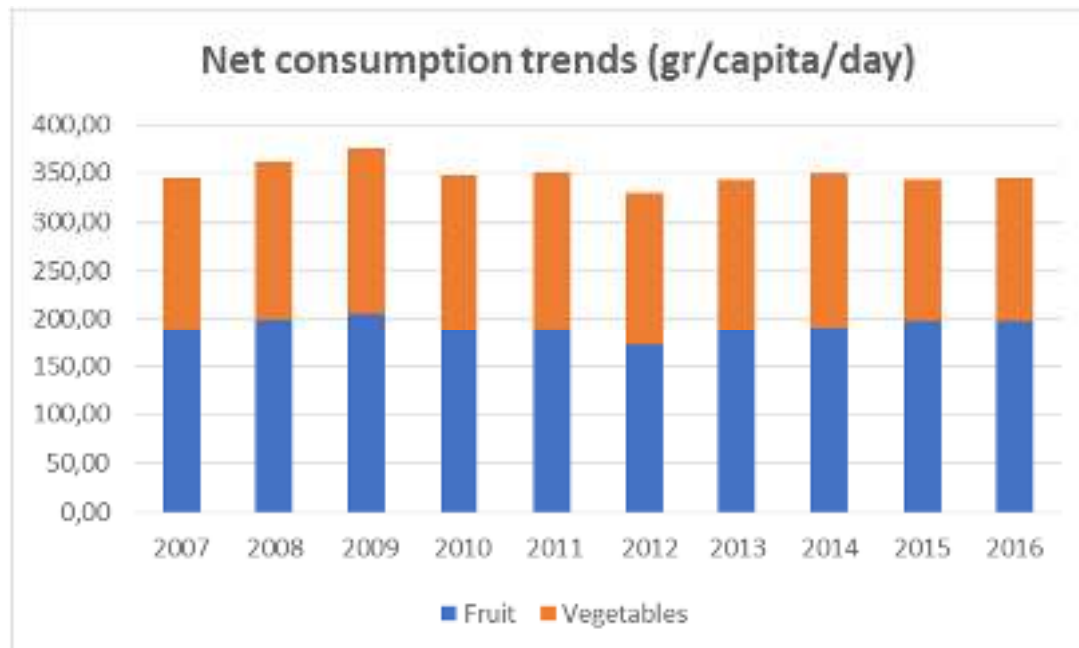
Fresh produce: key data

Key data (1)

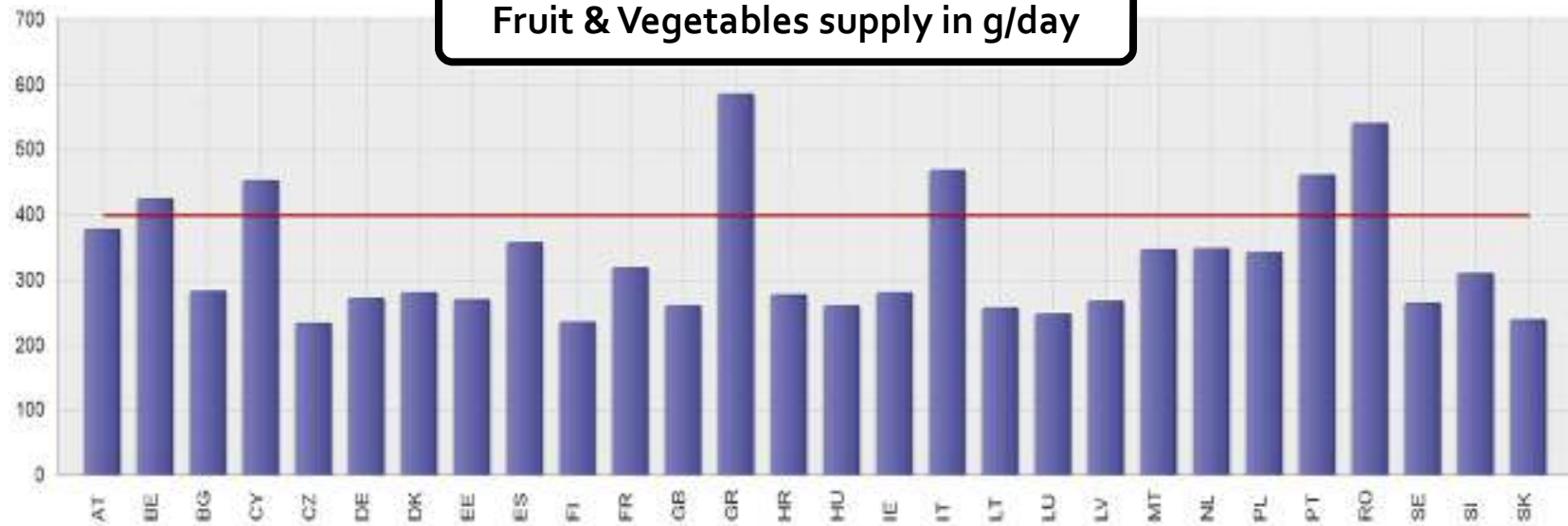


**Status last decade:
After decline, towards a recovery?**

Net EU consumption (gr/capita/day)



Key data (3)



**Current status:
22 out of 28 MS below
400 gr/day**



WHO Practical advice on maintaining a healthy diet

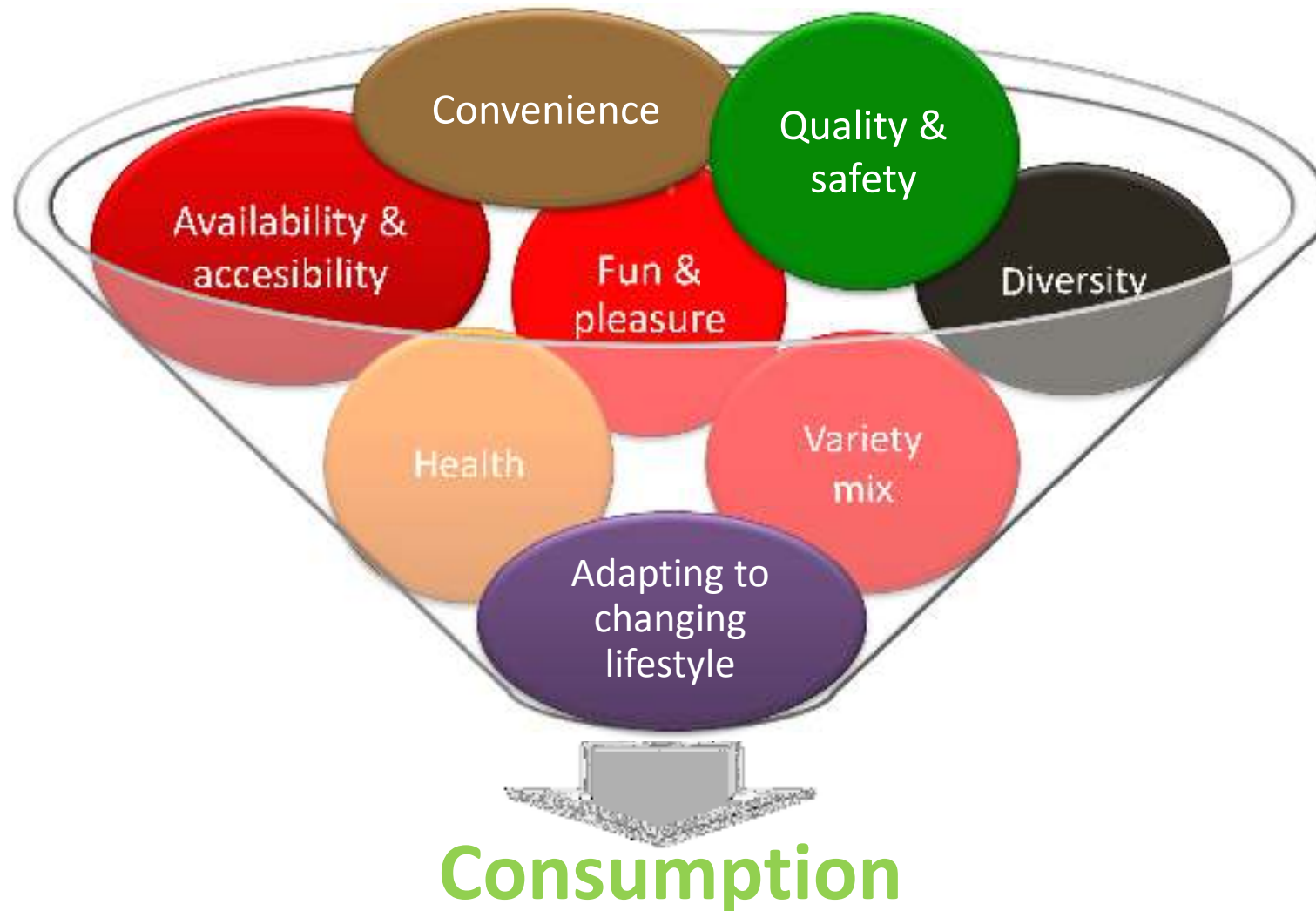
- Fruits and vegetables
- Eating at least 400 g, or 5 portions, of fruits and vegetables per day reduces the risk of NCDs (2), and helps ensure an adequate daily intake of dietary fibre.
- In order to improve fruit and vegetable consumption you can:
- always include vegetables in your meals
- eat fresh fruits and raw vegetables as snacks
- eat fresh fruits and vegetables in season
- eat a variety of choices of fruits and vegetables.

EC Commission

- Communication on the future of food and farming
- Thematic Network of Fruit and Veg of DG SANTE
- EU budget line of f&v healthy diet
- School scheme
- Eurobarometers : clear awareness of consumers but concerns of pesticides



Consumption drivers (2)



Consumption drivers (3)

Image and perceptions

- | |
|---|
| <p>PERCEPTION</p> <ul style="list-style-type: none">✓ Prices✓ Nutrition values✓ Food safety concerns✓ (Mis) use image <hr/> <p>✓ EMOTION</p> |
|---|

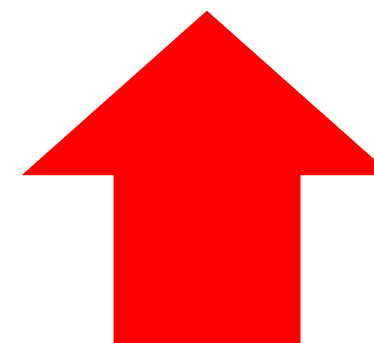


Science



Emotion

Local, seasonality, nature, organic, vegan, social media, price



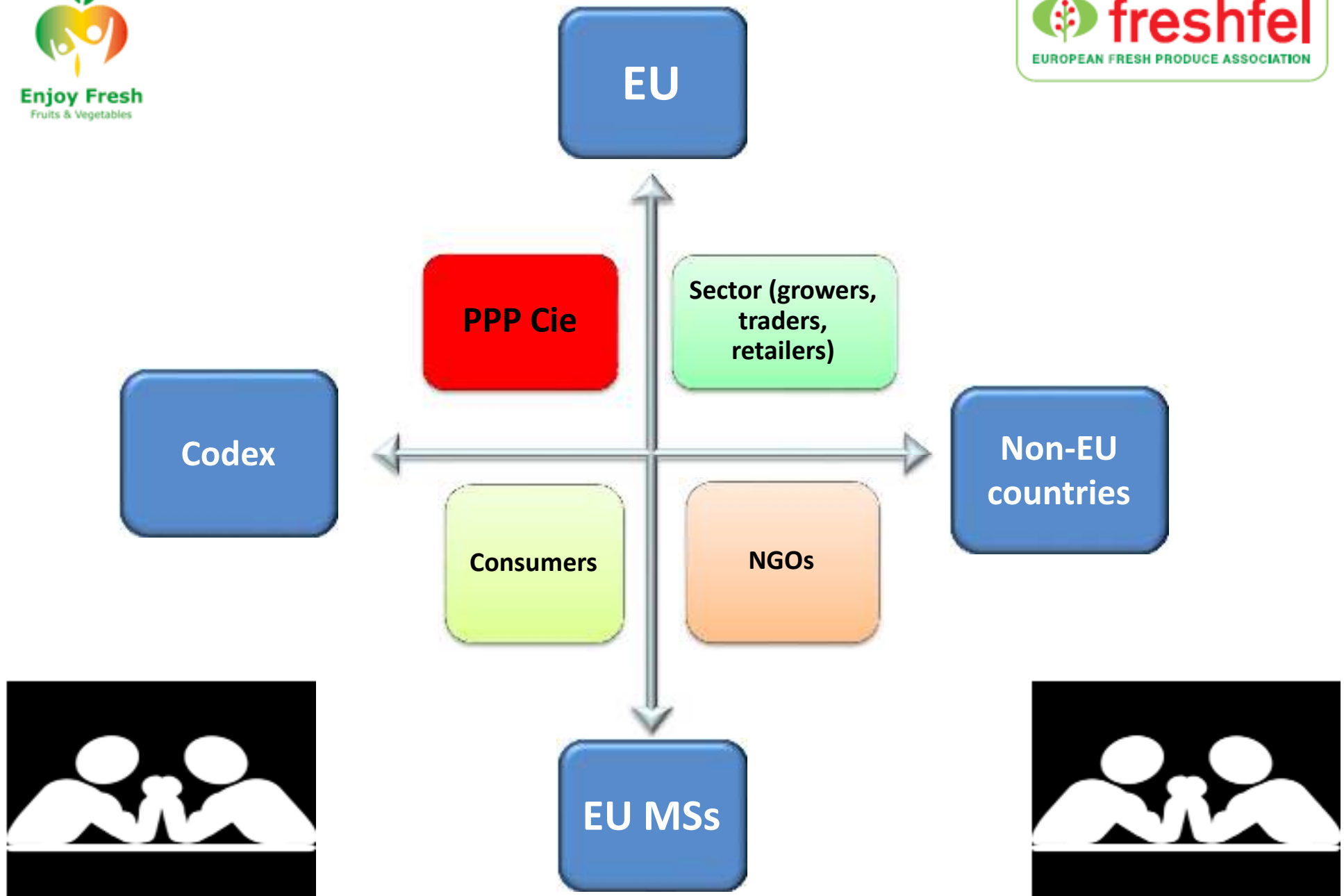
F&V: probably the food category more exposed to consumers emotions

Challenges in fresh produce sector with regard to PPPs



Multiple games are on!





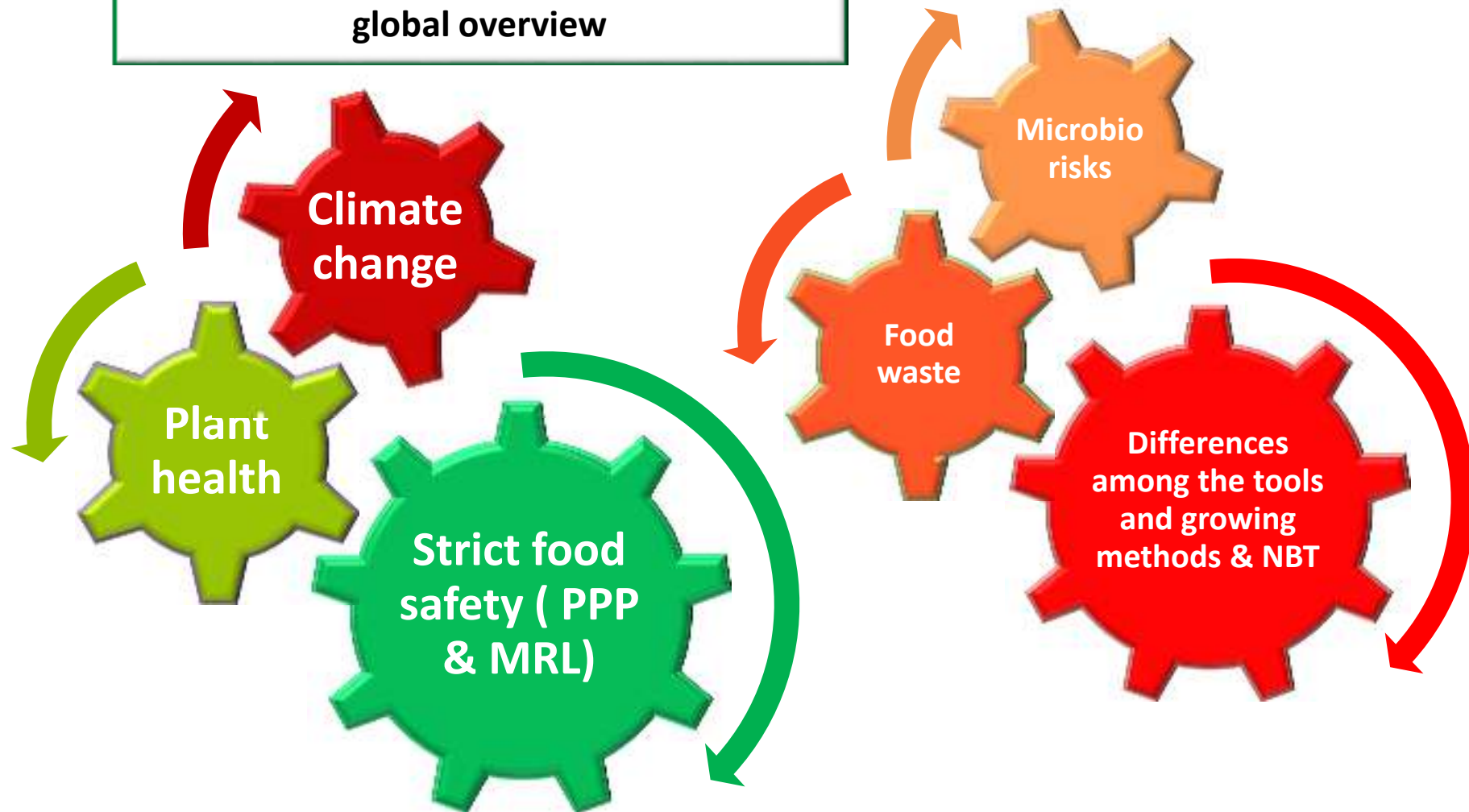
New international commitments



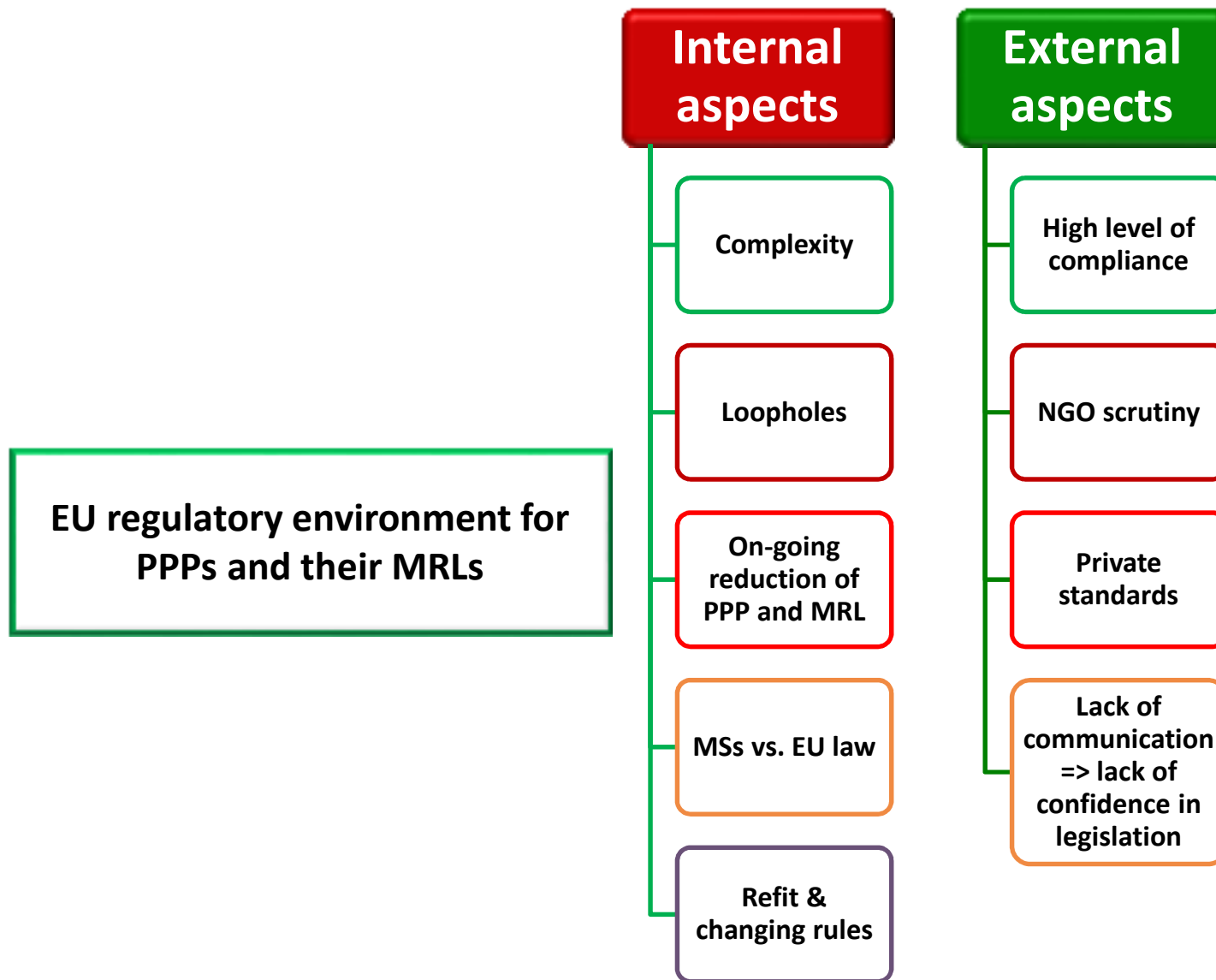
PARIS2015
UN CLIMATE CHANGE CONFERENCE
COP21·CMP11

Challenges (2)

Policy (in)coherence: PPPs within a more global overview



Challenges (3)



EU regulatory environment: business implications

Manufacturers of PPPs

- Leadership
- Education
- Transparency
- Knowledge of markets
- National registrations (incl. minor uses)

Growers

- Less and less tools (bees, EDs, etc.)
- Minor use & orphan crops
- Distortions due to (lack of) registration
- Competitiveness and lack of understanding of use by others
- Liability

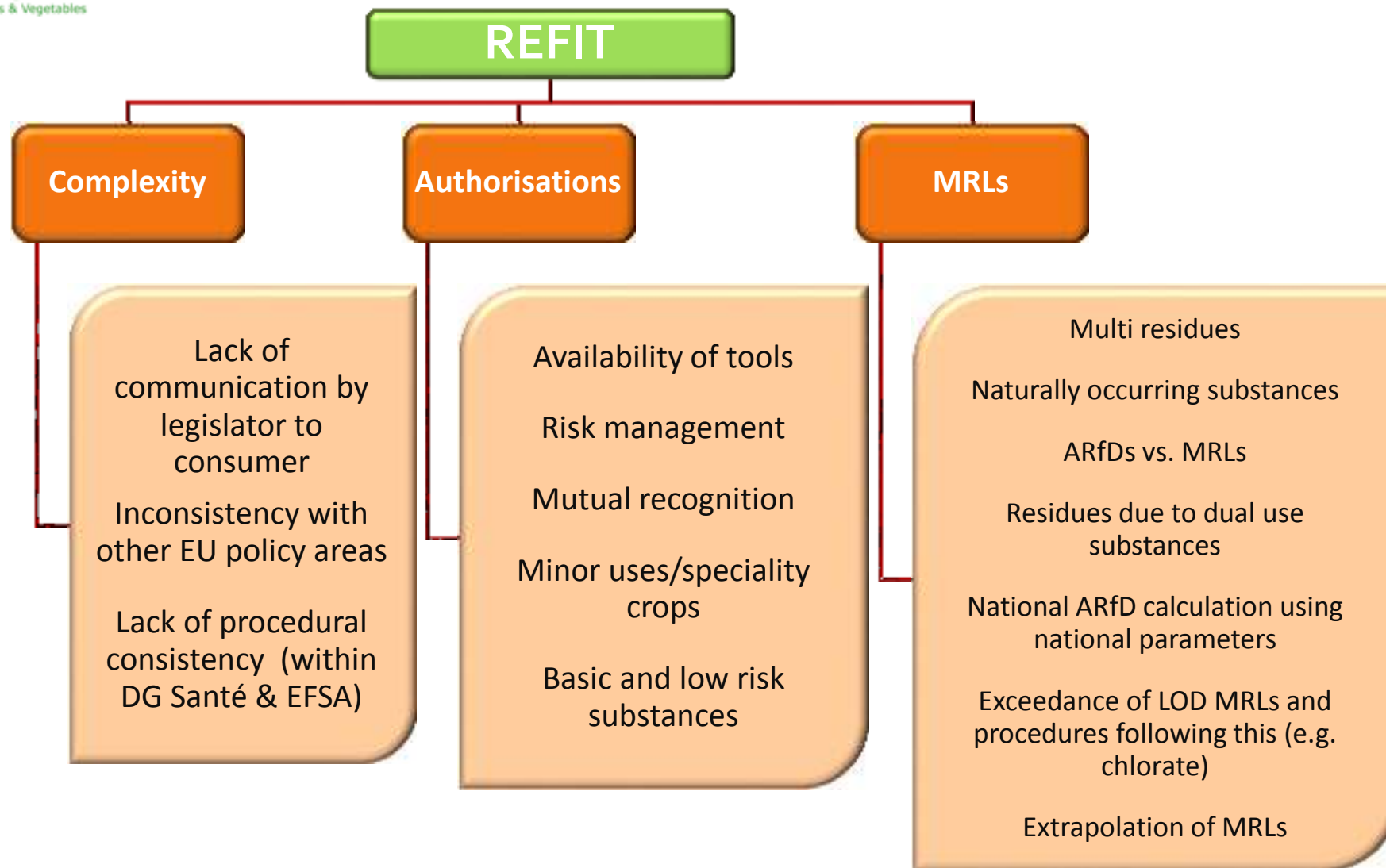
Operators

- Different rules according to market and customers
- Changing rules
- ARfDs, import tolerances
- Compliance plant health considering private standards
- Liability for compliance - RASFF and Hot spots

In case of F&V, the impact of EU policy is primarily a production issue NOT a trade issue

Challenges (5)

EU regulatory environment for PPPs and its MRLs



Challenges (6)

Hazard	vs.	Risk
<p>A Hazard is something that has the potential to harm you</p>		<p>Risk is the likelihood of a hazard causing harm</p>
SHARK		
		
<p>A shark in the sea is a hazard</p>		<p>Swimming with a shark is a risk</p>
LIGHTNING		
		
<p>Lightning is a hazard</p>		<p>Standing under a tree during a thunderstorm is a risk</p>



EFSA is the keystone of EU risk assessment regarding food and feed safety. In close collaboration with national authorities and in open consultation with its stakeholders, EFSA provides independent scientific advice and clear communication on existing and emerging risks.

www.efsa.europa.eu

Reg. 1107/2009 on PPPs => hazard based
 Reg. 396/2005 on MRLs => risk based



REFIT exercise could lead to the harmonisation of Regulations => both hazard based



Lower MRLs or LOD levels?

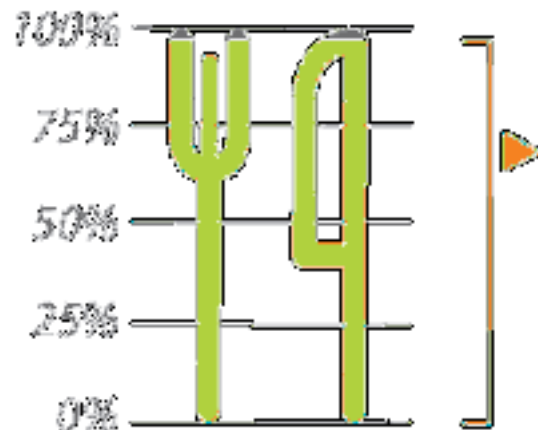


Opportunities and recommendations

Compliance:

Strong commitments of the sector towards GAP, IMP, GHP, monitoring, certification, etc.

High level of compliance in the Annual EFSA MRL 2014 report => collective responsibilities to prevent and address non compliance and RASFF hotspot



97%

of samples in 2014 were free of residues or contained residues that were within legal limits



Communication & confidence:

- Role of public authorities in securing consumers confidence
- ECPA campaign: #WithOrWithout
- NGO campaigns



Supply chain approach:



Leadership and stewardship role of PP Cie with the sector for use and compliance



Supply chain approach for compliance of market/customers



Growers and research center to implement technics to reduce pesticide dependency



Role of the Agrifood chain RT in Brussels for monitoring, networking and lobbying as appropriate



Sector Monitoring

Cooperation at different layers

Opportunities & recommendations(4)



R&I



Partnership

Building a future on quality, assets and innovation



**Quality,
freshness &
taste**



Sustainability

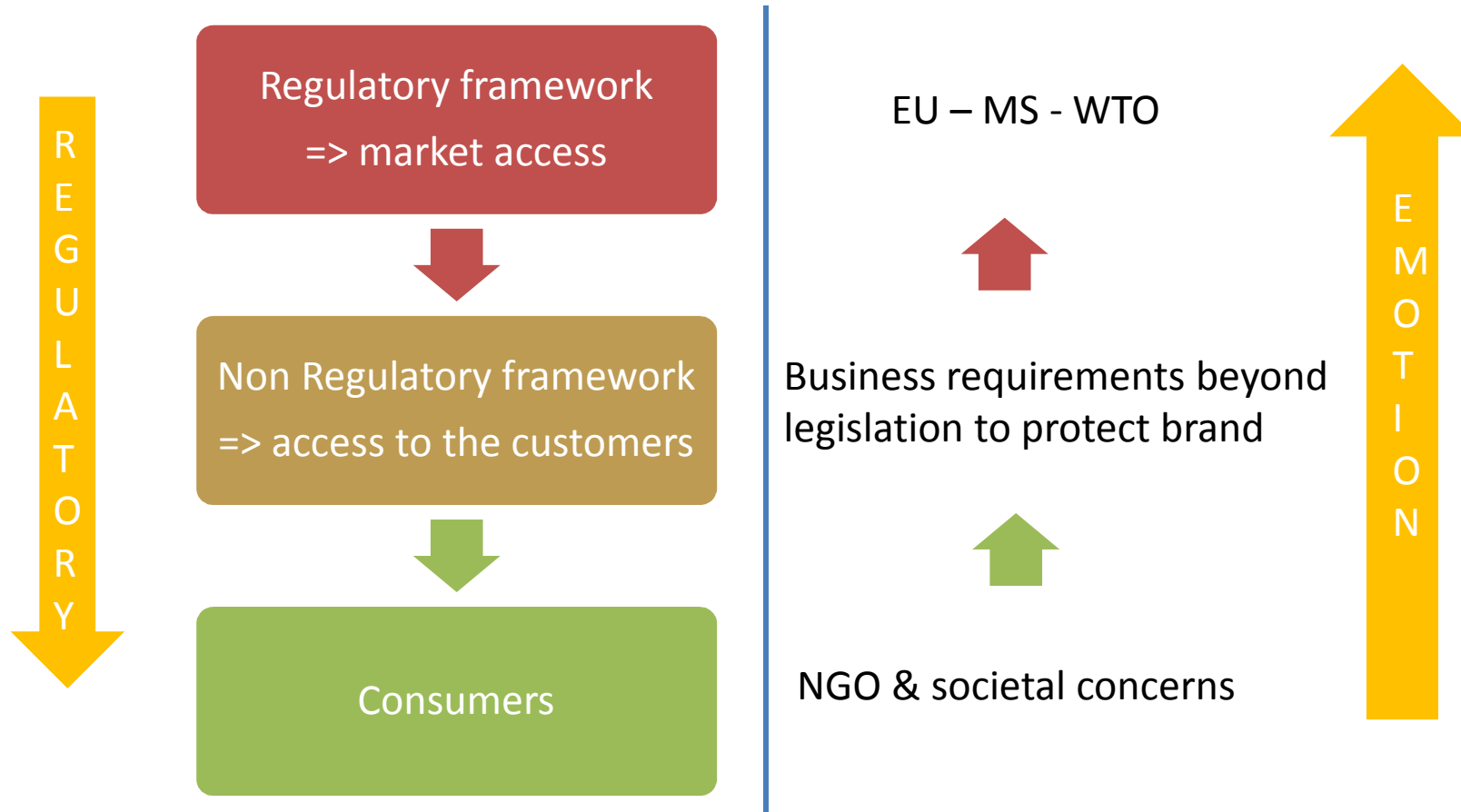


Enjoy Fresh
Fruits & Vegetables

Opportunities & recommendations (5)



Coping with business and societal reality



The sector is selling to “consumers” => pressure to reduce pesticides dependency

The private standards debate=> origin: lack of MRL harmonization



Brand protection & NGOs
scrutiny



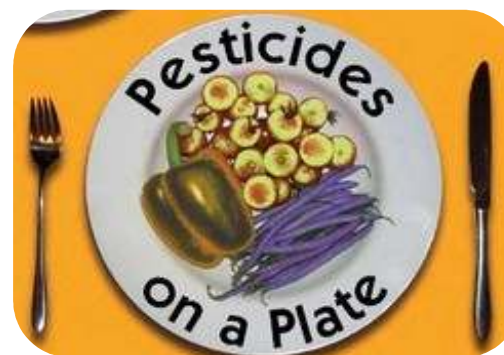
Lab testing uncertainty



Lack of confidence in legislation
(limited communication)



Loopholes in legislation
(e.g. ARfD vs. MRL)



Multi-residue effect – lack of
scientific knowledge

**External communication on pesticide usage (NGO- ECPA) are encouraging private standards !
Only official communication by authorities should be therefore to provide confidence**



Opportunities & recommendations (7)

Evaluating private standards



- Access to market v. access to customers:
 - safety is a non-negotiable prerequisite granted by legislation
 - and sector needs to cope with customers' requirements=> they will not disappear!
- Private standards are:
 - internal for brand protection and not “marketed” to consumers as leading to safer products
 - all suppliers subject to the same rules => flexibility possible as appropriate
 - only for selected customers, some market outlets are only subject to regulatory market
 - not only EU specific: also proliferate outside the EU
 - not retail specific: also private standards from food manufactures or even public (dimethoate in France)
- Complexity of private standards:
 - different standards are challenging => lead to lower denominator within long term relationship
 - complexity of coping with other principles/objectives of the legislation (e.g. plant health, food waste, microbial requirements, etc.) and technical GAP issues to be addressed
- Other aspects
 - private standards: market positioning => move towards sustainability & GAP + role of R&I
 - growers capacity to adjust to stricter rules => limited debate in the supply chain
 - more distortions resulting from minor uses or lack of international standardisation on PPP and MRL
 - public communication on confidence in the regulatory scheme is a must
 - Societal influence = driving force



REFIT



REFIT



REFIT: evaluating is legislation is still fit for purpose. In this case, three main objective of REFIT:

- Effectiveness and efficiency of Regulation 1107/2009
- Effectiveness and efficiency of Regulation 396/2005
- Relevance, coherence and EU added value of EU legislation on PPP and MRL



REFIT



Scope of ECORYS study- consultation methodology:

- Open public consultation: 9847 responses (46% from Germany => including 4334 from citizens and 5513 from those directly affected by legislation)
- Online survey to stakeholders : 244 responses
- MS consultation plus Iceland and Norway
- SME survey: 296 replies
- 60 interviews with Associations
- 4 focus group : Commission, EFSA, MS and other Competent authorities

Scope of ECORYS study- 28 questions to stakeholders:

- evaluate if legislation meet objectives such as :
 - high level of protection for both human & animal health a
 - protecting the environment
 - facilitate the functioning of the single market
 - safeguard competitiveness of EU agriculture
- evaluate if legislation
 - delivered expected benefits
 - achieved at proportionate cost
 - has problems of compliance and factors hindering compliance



Effectiveness and efficiency of Regulation 1107/2009



- Number of active substances: similar in absolute nb => but reduced scope, 505 reviewed, 19 new. Situation & toolbox to be looked by products and MS :> emergency authorisation is indicator of the lack of solutions/toolbox
- Often banned substances not replaced by equally effective
- One of the strictest legislation in the world with negative impact on competitiveness but contribute to protection of human and animal health and environment
- Costs : Health costs relating to pesticides usage = 150 billion€ = > ban of 16 AS for health will avoid genotoxic and long term toxicity risks . Environmental : 11 AS banned (risk of ground water, soil , wildlife contamination) => cost of water decontamination by 165 Mio €
- Obstacles: zonal system & mutual recognition , legal timeline, emergency authorisations, approval of low risk substances, minor uses, efficiency of alternative methods,.. For minor use & low risk substances: solution to be looked at pan-european level . Status of naturally occurring substance (chlorate)
- Costs : for MS approval : 44 Mio € annually (industry 250 Mio €, applicants costs 26 Mio €)
- Other issue: lack of understanding of precautionary principles; too prescriptive EFSA conclusion, impact on trade, timeline for renewal problematic
- No data on usage



Effectiveness and efficiency of Regulation 396/2005



- Achieve objectives to protect consumers and facilitate single market (harmonization of 150,000 substance-commodity combinations & high rate of compliance
- Revision procedure under Art 12 and efficiency of review procedure is low
- Industry cost 45 Mio € , 5 Mio € for MS + 8 Mio € EFSA
- Still no cumulative risk assessment in place
- Naturally-occurring substances and multi use
- Procedure for import tolerance

Suggestions: Rapporteur MS AS and MRL the same, develop on-line application clearer timelines, accept data from outside the EU when GAP are comparable



Relevance, coherence and EU added value



- Growing societal and consumer demand : out of the 4334 citizens repoding 91% consider that PPP and MRL do not sufficiently minimize impact on enviroment but is relevant for human and animal health,
- Challenges for EU farmers to address societal demands and remain compettitive (80% believe they are at a competitive disadvantage globally)
- Challenge to find alterntive subsitution of hazardous substances with insufficient innovative methods & availability of low risks substances
- Getting the right balance between transparency and confidentiality for stakeholdders but civil society consider their is a lack of opportunities of involving civil society in decision process
- Overall coherence PPP & MRL policy , except:
 - in regard to hazard based approach for cut-off criteria.
 - lack of internal coherence on some proactical aspects (dealys, emergency uses ..)
 - internationally : EU PPP hazard based approach compared to CODEX, SPS agreement, OECD,..)
 - Moderately coherent with other policies which are usually driven by the need while PPP is driven by hazard



Way forward



- Capacity issues: Competent authorities not able to comply with timeline
- Need of better coordination of workload
- Improve clarity (definition guidelines, risk based v.hazard)
- Simplification and modernization: decrease complexity
- Address tension between societal and consumers demands and ability of farmers to protect crops and maintain competitiveness
- 1107/2009 and 396/2005 are adding value at EU level compared to situation if rules would be national, and when national measures are taken they always interfere with the Regulations
- Need to better take into account opinions of the directly involved stakeholders as it seems too many relevance is given to outsiders



Thanks for the attention



EUROPEAN FRESH PRODUCE ASSOCIATION A.I.S.B.L