North American Perspective
Facilitating Trade Through Cooperation
James R. Cranney
California Citrus Quality Council
Major Points for Discussion

- Role of CCQC
- The importance of trade for minor crops
- Problems
- Suggestions for facilitating trade
California Citrus Quality Council

- Solve regulatory problems domestically and internationally
- Core mission is to facilitate trade
  - Maximum Residue Levels (MRLs)
  - Phytosanitary issues regarding insects and plant diseases
- Provide crop protection tools for growers
Exports are Economically Important

Revenue Contribution by Market:

- Domestic: 60%
- Export: 40%

Percent of Production Exported:

- Domestic: 66%
- Export: 33%
Top Orange Export Markets

(Thousand U.S. Dollars)

South Korea, $177,193
Canada, $137,820
Hong Kong, $80,719
Japan, $80,052
China, $37,784
Mexico, $10,042
Taiwan, $17,363
Malaysia, $17,134
New Zealand, $7,652
Philippines, $6,615
UAE, $2,271
Vietnam, $3,159
All Other, $11,734

Singapore, $11,974
Malaysia, Australia, $19,448
Taiwan, $17,363
Mexico, $10,042
China, $37,784
Japan, $80,052
Hong Kong, $80,719
Canada, $137,820
Top Lemon Export Markets
(Thousand U.S. Dollars)

- Japan, $56,273
- Canada, $55,760
- South Korea, [VALUE]
- Hong Kong, $12,578
- Australia, $14,737
- Chile, $1,885
- New Zealand, $1,518
- Taiwan, $1,804
- Indonesia, $2,099
- Philippines, $2,151
- Mexico, $2,483
- China, $4,055
- All Other, $2,173
- Philippines, $2,151
Export markets demand perfect maturity, blemish-free fruit, large sizes & uniform color.
This is the “cream” of the crop.
It may take select production from several groves to fill export orders.
Difficult to designate specific groves for specific export markets.
Production can go anywhere.
Pesticide residues should be “legal” anywhere; including post harvest fungicides used in packing houses.
Production and Trade Interface Issues

- Need many pesticide options (resistance)
- Difficult to manage acreage for specific markets
- Delayed use until MRLs are established
- Emergence of secondary standards (restricted pesticides and lower residue levels)

- Are there MRLs?
- Can we avoid delays?
- Counterproductive
Harmonization Challenges

- Important trading partners are moving away from a single global standard, creating a proliferation of many different standards

- Japan
- Taiwan
- Korea
- Hong Kong
- China
- European Union (?)
How can we manage in this environment?

- Different MRLs
- Number of trials
- Crop groups
- Process
- Cost
Consistency in process and data requirements
Saves resources
Predictable
More harmonized MRLs

IMPORT MRL GUIDELINE FOR PESTICIDES
A guideline on possible approaches to achieve alignment of International MRLs

APEC Food Safety Cooperation Forum
Sub-Committee on Standards and Conformance
July 2016
Communication and Flexibility

- Provide avenues and opportunity to discuss problems
- Maintain flexible process to address problems
- Korea Ministry of Food and Drug Safety
  - Flexibility in implementation
  - Added crop groups
  - Allow Codex data for generic pesticides
  - Open communication and dialogue
Can countries incorporate Codex in new MRL setting systems?

Use Codex standards as temporary standards to fill gaps
Many countries are adopting proprietary MRL setting systems

Increasing cost and complexity in establishing MRLs

Many different MRL standards and delays for growers

Use APEC guidelines

Provide flexibility in adopting proprietary systems

Incorporate Codex standards
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MCFA Secretary
Chairman, MCFA International Subcommittee
Minor use pesticides  
– a view from the Canadian horticulture sector

Rebecca Lee, PhD  
Executive Director  
Canadian Horticultural Council  
October, 2017
Contents

• Overview of CHC
• Benefits and the use of dedicated minor use/assistance programs
• Managing emerging pest issues
• Export/trade and chemical review issues
• Degree of engagement with dedicated minor use programs and legislators to support outcomes for minor use
• Factors that could facilitate grower outcomes and support into the future
Overview of CHC
Who we are

• National non-profit advocacy group
• Based in Ottawa
• Governed by a Board of Directors
• 10 staff
• We are the voice of Canadian fruit and vegetable growers
Who we represent

• Over 22,000 growers
• Over 130 member organizations
• Over 120 different commodities
• Members are in Canada and beyond
What we do

• Advocate for members on key issues
• Facilitate government consultations
• Coordinate research projects and funding
How we are organised...

**Core areas**
- Labour
- Trade and marketing
- Industry standards and food safety
- Finance and business management
- Crop, plant protection and the environment

**Commodity groups**
- Apple & tree fruit
- Potato
- Greenhouse vegetables
- Berries
- Field vegetables
Benefits and the use of dedicated minor use/assistance programs

AAFC’s Pest Management Centre (PMC) and Pesticide Reduced Risk Program (PRRP) impact on minor use (MU) crops in Canada has been very positive.

• From: few pesticides registered + many emergency registrations / year

• To: growers now have registered pesticides for most of our priority pests and diseases + the need for emergency registrations is greatly reduced.
Benefits and the use of dedicated minor use/assistance programs (cont.)

• Almost universal dependence on PMC to generate residue and efficacy data for MU food crops and Dislodgeable Foliar Residue (DFR) data for MU non-food crops.

• Benefits of the PMC:
  • Dedicated, reliable funding and staff for on-going MU registrations.
  • Transparency - Growers pick projects through provincial MU coordinators grower meetings and/or by attending the Ottawa meeting.

• Concerns:
  • PMC was never intended or budgeted to do DFR work.
Managing emerging pest issues

- AAFC’s PMC, provincial ministries of agriculture and grower groups, e.g. CHC, are engaged in research and finding solutions for emerging pest issues such as Spotted Wing Drosophila (SWD) and Brown Marmorated Stink Bug (BMSB).

- PRRP is engaged in work to address priority pests and diseases e.g. Downy Mildew GH Cucumber working group

- Grower associations engaged in finding solutions to new and emerging economic pests, e.g. OGVG and pepper weevil on GH peppers
Managing emerging pest issues: Challenges

• Time between emergence of new pest and registration of control products
  • Government agencies can be slow to respond and growers pay the price
  • Can the regulatory system respond fast enough when a quarantine pest is found? What mechanisms are in place for CFIA and the PMRA to coordinate to address quarantine pest issues?

• Resistance management
  • Registration of products in different FRAC, HRAC and IRAC

• Discontinuing pesticide registrations with no viable or efficacious alternatives in place
  • e.g. imidacloprid can leave large gaps in growers IPM toolboxes

• Discontinuing broad spectrum pesticides resulting in secondary pest becoming serious problem
  • e.g. imidacloprid used to control aphids and whiteflies also controlled *Lygus* and stink bugs.
Export/trade and chemical review: Challenges

• Harmonization with our major trading partner
  • The many joint Canada-US (PMC-IR4) minor use projects are helping to address this issue.
  • Next step: Global MU projects. Same time registrations and same MRLs in OECD countries will help
    Canadian farmers who are seeking new export markets.

• Resources needed by CFIA to address phytosanitary barriers to trade
  • Bilateral agreements needed for Canadian farmers to gain access to new markets & to resolve barriers
    in existing markets

• Harmonization with the EPA
  • PMRA working on DFR database for greenhouse food and non-food crops, when DFR data could be
    used interchangeably. Burgeoning problem with re-evaluations, too.
  • Lack of harmonization = different registration decisions between CAN/US

• Risk based assessments vs. hazard based assessments
  • Will Canada move to hazard based assessments like Europe?
  • Could lose many important pesticides – what will replace them?
  • Will we go back to a situation where many EUR will be needed every year?
Degree of engagement with dedicated minor use programs and legislators to support outcomes for minor use

- Growers and grower associations are fully engaged with the PMUCs, PMC’s MU workshops.
- CHC CPAC meets at least once yearly with top PMC and PMRA staff to discuss issues of concern to the growers around pesticide registrations.
- CHC and individual grower groups respond to PMRA proposed registration/re-evaluation decision consultations.
- CHC –educating politicians about issues of importance to agriculture - Fall Harvest
Factors that could facilitate grower outcomes and support into the future

• Biopesticides
  • Research and extension support for growers

• New invasive pests and diseases
  • Resources to minimize such events from happening
  • Improvement of government agency response times
  • Movement from a risk-based to a hazard-based model
  • Government supports if many pesticide registrations are discontinued/phased out?
  • Transition period to allow alternatives to be put in place or will we go back to a situation where many EURs are submitted every year?
Barriers to accessing crop protection products

• Canadian registrations without export MRLs
  ➢ Rovral, Dynomite and Vendex

• Investment too great for registrants
  ➢ Cyflufenamif, triflumizole

• PMRA is not the EPA
  ➢ Occupation exposure data (DFR)
  ➢ Value and efficacy data
To contact us:

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www.hortcouncil.ca

@CHC_CCH

CHC AGM
March 13-15, 2018
Ottawa
The Journey of Dragonfruit and Difenoconazole
Introduction – Dragonberry Produce
Dragonfruit with quality issues without Difenoconazole
Reaching Out to All Parties
January 2014

Governments

- United States Environmental Protection Agency (EPA)
- United States Department of Agriculture (USDA)
- Vietnam Embassy, WA-DC

Researcher & Private Sectors

- IR-4 Project, Rutgers University
- Syngenta –USA Office
- Importers from USA
- Exporters from Vietnam
Working Together = Result

- February 4, 2015
- Federal Register
- Vol. 80, No. 23
- Import Tolerance for Dragon fruit into USA
- Difenoconazole 1.5 PPM
- EPA
- Syngenta
- Dragonberry Produce
Market Conditions

**IMPROVEMENTS**

- Dragonfruit qualities has less defects arrival issues
- Less reported cases of dragonfruit citations by law enforcement to order for destruction of fruits.
- Increased volume of dragonfruit importation into the USA

**PROBLEMS**

- Not all imported dragonfruits meet USA MRL tolerance
- Unfair trading prices of dragonfruits imported into USA and sold at price less than dragonfruits that do meet USA MRL tolerance
KEVIAR 325SC
by Brightonmax International
in the Approved Vietnam List of Chemical Notice 34/2015/TT-BNNPTNT

THÀNH PHẦN
Azoxystrobin ........................ 200 g/lít
Difenoconazole ........................ 125 g/lít
AMISTAR TOP
by Syngenta - Vietnam
Not approved for use on dragonfruit since Oct. 12, 2015

Azoxystrobin  200 GL
Difenoconazole  125 GL
Grower’s Continued Difficulties

**Vietnam Regulations**
- MRL laws from different countries are not shared with growers
- No supports or educations programs to teach about MRL
- Unclear process of how trade name or chemical compound are registered for use.

**Global Regulations**
- Risk assessments used by countries do not share the same methods of evaluating the data
- Multiple different MRL requirements for dragonfruit, in different countries that doesn’t grow the fruit
Finding Continued Success with help from Global Leader Countries

Global MRL

• All countries sharing their methods of evaluating risk and finding common ground standards
• Harmonization of MRL laws will help prevent lost for growers in all regions

Helping Developing Countries

• Streamlining the MRL registration process will help growers in developing countries with no resources the support
• Providing education of MRL during trade agreements
Thank You!

Cảm ơn
Regional look at growers challenges and engagement enabling current and future opportunities

Luc Peeters | 04.10.2017
Chair of the Copa and Cogeca Working Party on Phytosanitary issues
Regional look at growers challenges and engagement enabling current and future opportunities
Index

- Introduction
- Current situation of minor uses and specialty crops in the EU
- European legislative framework
- Shortcomings and actions
- Proposals and recommendations
- Conclusion
Introduction
Introduction (I)

Two organisations....

Copa
Created in 1958, Copa represents 23 million European farmers and family members

Cogeca
Created in 1959, Cogeca represents 22,000 European agricultural cooperatives

Copa and Cogeca
In 1962, a joint Secretariat was created, making it one of the biggest and most active lobby organisations in Brussels

« The united voice of farmers and their cooperatives in the European Union »
Mission
To ensure a viable, innovative and competitive EU agriculture and agri-food sector

Organisation
66 Member organisations and 34 Partner Organisations
25 agricultural sectors covered (many Minor Uses):

- Cotton
- Flax and Hemp
- Flower and plants
- Fruits and vegetables
- Hops

- Rice
- Seeds
- Tobacco
- ...
- And Major crops with Minor Uses
Current situation of minor uses and specialty crops in the EU
Current situation of minor uses and specialty crops in the EU (I)

**Importance of Minor Uses**
- Around 85-90% of total crops
- Around 5% of total European Utilised Agricultural Area (UAA)
- Mostly vegetables, fruits, nurseries and flowers: €70 billion EU production value
- 20% of total EU agri-production value
- Specialty crops provide diversity in diet: wide range of variety
- High speciality crops mostly on high specialised farms

**Definition of MUSC:** crops and pests for which industry does not provide solutions
Main challenges

- Magnitude of impact of pest problems similar to major crops
- Economical impact on farm level is very high
- Crop protection solutions not available mainly due to high costs of development
- Resistance build up if no rotation in active substances
- Emergency authorizations are not long term solutions
- Develop new solutions for these quality crops
- Lack of involvement and participation from all EU Member States
- Distortion of competition at EU level
Current situation of minor uses and specialty crops in the EU
European legislative framework
European legislative framework (I)

Official regulatory framework

- Regulation 1107/2009 concerning the placing of plant protection products on the market
  - New active substances (February 2016)
    - 39 new substances submitted since June 2011
    - 11 active substances have an Approval vote
    - 9 have also an MRL vote
    - 2 have MRL regulations
    - 1 Product authorised
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 authorisations

**Numbers of emergency authorisations notified at PAFF meetings**

- May
- July
- October
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*
EU added value

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

Welcome to the European Union Minor Uses Database EUMUDA!
Shortcomings and actions
Shortcomings and actions (I)

**Shortcomings**

- Loss of active substances (EDs)
- Obstacles to mutual recognition within same zones
- Not unique list of minor uses and specialty crops / no definition
- National assessment for alternatives to Candidates for Substitution
- Lack of commitment and not enough funds for Minor Uses (CF)
Shortcomings and actions (II)

- Agri-Food Chain Roundtable (AFCRT)
- Update of Collaboration roadmap with International Biocontrol Manufacturers’ Association
- Other collaborations
  - Low Yield report, workshops (neonicotinoids...)
- Participation in the EU Minor Uses Coordination Facility
- Participation in the Sustainable Plant Protection Initiative
Proposals and recommendations
Proposals and recommendations (I)

**Regulatory aspects**

- Propose a positive definition to Minor Uses and Specialty Crops
- Facilitate registration (including pan-European autorisation for MUSC)
- Provide more incentives for companies to invest:

<table>
<thead>
<tr>
<th>Possible risk classes</th>
<th>Approval periods</th>
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</thead>
<tbody>
<tr>
<td>Cut-off</td>
<td>No approval</td>
</tr>
<tr>
<td>CfS</td>
<td>7 → 10 years</td>
</tr>
<tr>
<td>Specific risk</td>
<td>10 → 15 years</td>
</tr>
<tr>
<td>Standard</td>
<td>10-15 → 20 years</td>
</tr>
<tr>
<td>Low risk</td>
<td>Unlimited approval period</td>
</tr>
</tbody>
</table>

- Application of Commission Implementing Regulation amending the criteria of low risk substances
Proposals and recommendations (II)

Other initiatives

- More integration/coordination of EU programmes with GMUS
- More European vs national initiatives (MRL, MR, CF, zonal and European authorisations...)
- Long-term funding of the Minor Uses Coordination Facility
- Allocate EU research funds for MUSC
- To develop chemical and non-chemical solutions for MUSC, according to IPM principles
- **Bottom-up approach: ensuring Farmers and Agri-Cooperatives’ involvement**
- Stakeholders participation in the Sustainable Plant Protection Initiative
Many of the recommendations are shared through the AGF Chain:

**MUSC is a MUST** => Need to build a solution

There is a momentum:

- Persistent call of AFCRT and its members on the need for a robust and long lasting solution
- MUSC was recognised through the setting up of the Minor Uses Coordination Facility Secretariat
- Pan-European cooperation based on trust is key to address the issue of MUSC
- Minor Uses Coordination Facility Secretariat = appropriate forum of debate and action
  - Commodity Experts Groups
  - Horizontal Experts Groups
- Role of European Commission, Member States Competent Authorities
- REFIT process of Regulation (EC) N° 1107/2009 = opportunity to review options for either taking benefit of existing provisions or identify new requirements to better address MUSC
Conclusion
Conclusions (I)

- EU competent authorities are very reluctant in dealing with MUSC
- PPPs industry is very active in “greening programmes”, less in MUSC
- Both are hoping that farmers are doing the work and paying the bill (twice)
- Nice work is done in the technical groups where some MS and stakeholders are taking the lead, having big positive results
- More of this cooperation/collaboration is needed
- Implementation of Mutual recognition in MS should be imposed by EC
- Big pressure on all kind of AI will influence MUSC in the first place
- Growers and PO are doing their part, please join/help us

because
Conclusion (II)

<table>
<thead>
<tr>
<th>Crop</th>
<th>Penismon (Diospyros kaki)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pest threat</td>
<td>Spring thrips (Scirtothrips inermis)</td>
</tr>
<tr>
<td>Region at risk</td>
<td>Spain</td>
</tr>
<tr>
<td>Crop area at risk</td>
<td>10,000 ha</td>
</tr>
<tr>
<td>Potential pest impact</td>
<td>The spring thrips attack the persimmon trees mostly during their flowering, altering the fruit production.</td>
</tr>
</tbody>
</table>

If the EU fails to provide plant protection solutions for minor use and speciality crops, is Europe ready to lose a market worth €70 billion/year, representing 22% of the total value of annual EU agricultural output?

---

* An awareness raising campaign promoted by the EU Agri-Food Chain Partners (ANIEELA, CELCA, CCERCA, COPA-Cogeca, ECPA, EFA, FEDIMA, IRFA, POGRE, and Union Fleurs)

** European Commission, Council of the European Union, European Parliament, and Member States

*** Minor uses concern crops grown on relatively small acreage like fruits, herbs, and vegetables, ornamentals, including rice, seed crops and small crop seed treatments, hops, flowers and all those plants that need a tailor-made plant protection product, whether it is for growing them, storage or transportation
A Regional Look at Grower Challenges and Engagement: Enabling Current and Future Opportunities

Tanzania Horticultural Growers Perspective

Kelvin Remen Swai
Policy and Advocacy Manager

Tanzania Horticultural Association (TAHA)

www.tahe.or.tz
About TAHA

- Established in 2004 and became operational in 2005
- Established to promote and develop horticulture and address the general and specific needs of its members.

**VISION:** “An economically vibrant and sustainably prosperous horticulture industry”

**MISSION:** “Driving inclusive, transformative, competitive and sustainable horticultural growth in Tanzania”

Coverage: 15 regions including Unguja and Pemba

TAHA’s four main Strategic Objectives:

1. Lobbying and Advocacy - Govt and donors,
2. Technical Support – projects, trainings, seminars, shows, etc
3. Information dissemination – media, researchers, govt, consultants, etc
4. Promotion – in and outside Tanzania

www.taha.or.tz
TAHA Approach and Coordination

Value Chain Actors

- **Access to Inputs Subsidy Program**
- **Access to Finance**
- **Logistics**
- **Enabling Environments (Advocacy)**

**Infrastructure:**
- Markets
- Irrigation
  - Drips
  - Solar

**Extension Services (GAPs):**

- Govt, DPs, Research Inst
- Off-takers, Govt, ICTs
- Dev org, LGAs, etc.
- Govt, DPs, off-takers etc.

**Market Linkages:**

- TAHAFresh, Airlines etc.
- Financial and grants institutions: TADB, VFT etc.
- Dev organizations such as Milele

**TAHA Information System (TIS):**

**ICTs, DPs**
Logistics

Horticulture logistics solution

- Air and Sea freighting
- Trucking
- Clearing & forwarding
- Perishable ground handling

www.taha.or.tz
Enhanced productivity
CONTRIBUTION OF HORTICULTURE IN TANZANIA

• Main contributor to foreign income earned from agriculture (38%)

• Rapid growth: US$ 545.5 million in 2015 from UD$ 64 million in 2005

• Employs about 2.5 million people: 44 Million ha of arable land, only 6% utilized

• Food and Nutrition security

• Youth and women employment
# Horti Production Trend in Tanzania

Aggregate production data (MT) 2013/14 – 16/17

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</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Fruits</td>
<td>4,416,690</td>
<td>4,574,240</td>
<td>4,711,000</td>
<td>4,946,550</td>
</tr>
<tr>
<td>2.</td>
<td>Vegetables</td>
<td>1,005,305</td>
<td>1,041,375</td>
<td>1,189,000</td>
<td>1,236,560</td>
</tr>
<tr>
<td>3.</td>
<td>Flowers</td>
<td>10,790</td>
<td>11,140</td>
<td>11,500</td>
<td>11,615</td>
</tr>
<tr>
<td>4</td>
<td>Spices</td>
<td>8,377</td>
<td>8,609</td>
<td>20,400</td>
<td>21,420</td>
</tr>
</tbody>
</table>

- *Three quarters of horticultural products is fruits (in terms of volume)*

- Increasing number of customers of the products
- Increasing population and
- Awareness: horti as a key component to food and nutrition security

www.taha.or.tz
Ensure access to quality agricultural inputs (availability, accessibility, affordability and proper utilization)

- In 2008, TAHA managed to secure a blanket registration for 300 pesticides for veggies and fruits in Tanzania
- Fertilizer (Amended) Regulations 2017
  - Reduction of field trial period from three cropping seasons to one.
  - Reduction of field trial costs from USD 30,000 to USD 10,000
- Registration of Biological Control Agents for veggies and fruits (Currently working on the regulations for registration of microbials).
Our Advocacy work......

- Close working relationship with Government Registration Authorities/Agencies (TPRI, TFRA, TOSCI, NBCP)
- Strong relationship with Agro dealers (Allied members) i.e. Syngenta, Yara, Real IPM, Triachem, By trade
  - Technology Testing, dissemination and promotion to farmers
Our Involvement in IR4 Project

• We are part of the research
• Local coordinators on the ground
  - Funding Management
  - Trial Farms identification
  - Agronomic support to the project
• Participating in residue and efficacy trials
  Supervised Residue Field Trials of Sulfoxafur (Closure 240SC) on mangoes
Achievements from IR4 Project

• **Anticipated Increase in export/trade potentials** as veggies and fruits produced are in line with market requirements (MRLs levels)

• **Capacity building**
  ✓ of local research institutions and government regulators in conducting high quality residue field studies, conducting innovate research related to reducing pesticide residues on food crops

✓ Residue analysis

• **Food and Environmental Safety** as a result of proper application of less hazardous pest control products
Harmonization of Pesticide Registration in East Africa

• Three technical groups were constituted to work on three envisaged guidelines
  - harmonization of efficacy trials
  - harmonization of residue trials for pesticide registration
  - harmonization of pesticide registration data requirements

• **Harmonization of registration procedures** will facilitate movement of high quality products and increase farmers’ access to quality pesticides

• **Abolition of red tape bureaucracies** in registration will increase farmers’ access to newer and less hazardous pest control products
Tanzania Horticultural Association

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TAHA PHOTOS: https://www.flickr.com/photos/tahacommunications

www.taha.or.tz
A Regional Look at Grower Challenges and Engagement: Enabling Current and Future Opportunities

Chilean fresh fruit industry perspective

Eduardo Aylwin
Agronomist, Chilean Food Safety and Quality Agency
Third Global Minor Use Summit (GMUS-3) Montreal, Quebec, Canada October 1-4, 2017
Chile in the global economy

Chile has 26 free trade agreements with 64 markets, representing 64.1% of the world population and 86.3% of global GDP.
Chilean fresh fruits exports 2015 (2015: 2,4 millions tons)

- Total: US$ 15,6 billions
- Fresh fruit: US$ 4,6 billions (30%)

Source: Central Bank of Chile
Facts

1. Every day 82 million consumers in the world eat fruit from Chile.*  
   Shipments to more than 180 countries on 5 continents

2. Chile is currently the main exporter of fresh fruit in the southern hemisphere **and 4th fresh fruit exporting country in the world (2014)***.

3. Chile is the leading exporter of grapes and blueberries in the world. **

4. Chile is the second largest exporter of cherries in the world. **

5. Chile is perceived as a reliable and "world-class" supplier in terms that meet the demands and regulations of the international market. ****

The Chilean fruit industry has been successful in meeting phytosanitary requirements and food safety standards around the world.

Phytosanitary requirements (quarantine pests)

Food Safety standards (MRLs)

- 0.01 ppm
- 3.5 ppm
- 0.6 ppm
- 1.0 ppm
Pesticide Authorization & MRLs settings

The authorization (register) of pesticides in Chile is faculty of SAG, National Agricultural and Livestock Service (Regulation 3670/1999). The process follow guidelines of:


The Ministry of Health through the dictation of the appropriate technical standard shall determine the **tolerances for residues of pesticides** in food allowed (Regulation No. 33/2010 and No. 762/2011)

In Chile it is not carried out a risk analysis process for the establishment of MRLs and are adopted from CODEX, EU or USA
MRLs settings

Supreme Decree No. 977/96 art 162: “The Ministry of Health through the dictation of the appropriate technical standard shall determine the tolerances for residues of pesticides in food allowed”

Regulation No. 33/2010 and No. 762/2011 (Current regulation)

In Chile it is not carried out a risk analysis process for the establishment of MRLs

Criteria:

1. CODEX
2. EU or USA MRLs (depending on specific criteria)
Pesticides Registered in Chile (Fruit trees)
Approximate number of active ingredients registered by type of pesticide and crop

Adapted from the “Authorized Pesticide List” (SAG, 2017)
Pesticides registered in Chile (Other crops)
(Average number of active ingredients registered by pesticide type and crop)

Adapted from the “Authorized Pesticide List” (SAG, 2017)
**Adressing Minor crops issues in Chile**

## Stakeholders

<table>
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<tr>
<th>Regulator</th>
<th>Pesticides industry</th>
<th>Growers and exporters</th>
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</thead>
<tbody>
<tr>
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<td>AFIPA (Croplife)  IMPPA (Generic)</td>
<td>ASOEX / FEDEFRUTA</td>
</tr>
<tr>
<td>Authorization</td>
<td>Request authorizations</td>
<td>Use authorized pesticides</td>
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</tbody>
</table>
## Market need

### Pomegranate case
(A fast-growing crop in recent years with few pesticides authorized to control pests)

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<tr>
<td>ask for new uses</td>
<td>Support new uses</td>
<td>Authorize new uses</td>
</tr>
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</table>
Quarantine pest control need

Phytosanitary authority order obligatory controls in host crops. Some crops were not authorized for the recommended pesticides.)

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<td></td>
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### No market need, no quarantine need?

Is the case of some minor crops in Chile (herbs, spices, specialty vegetables)

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- Need pesticides for minor crops
- Low interest in support new uses for minor crops
- No Authorization
Fruit growers and exporters in Chile have shown great adaptability in pest management considering both availability of pesticides, phytosanitary requirements and different official and private MRL standards around the world.

Minor crops issues in Chile have been solved mostly under quarantine requirement situations and when the market demand is enough. In this cases, there has been engagement of stakeholders to support positive outcomes for minor uses.

Stakeholders in Chile have not participated in assistance programs to seek solutions.

There were some initiatives that proposed to jointly finance the effectiveness trials but did not prosper.

There is a huge challenge for the country and its stakeholders to offer collaborative solutions to the problem of minor uses and to participate actively in regional or international assistance programs.
Acknowledgments
Alimentos seguros y saludables, tarea de todos y todas
A Regional Look at Grower Challenges and Engagement

Australia
Jodie Pedrana
Hort Innovation R&D Manager - Minor Use

Tuesday, October 3rd, 2017
Through innovation, Hort Innovation strives to increase the productivity, farm gate profitability and global competitiveness of Australia’s horticulture industries.

- Not-for-profit, grower-owned RDC for Australia’s $9.5b horticulture industry
- Invest > $100m in research, development and marketing programs annually
Hort Innovation Minor-Use Program

• Facilitates Strategic Agrichemical Review Process (SARP)
• Data generation projects to support minor-use
• APVMA Permit applications
• Contact for permits/label extensions with the APVMA & Registrants
• Maintains database of industry permits/applications/data
• Provides updates to industry.
Some of the Challenges Industry Face

- Market Failure - Limited access to new or existing pesticides
- Timelines to gain access - permits / label registrations / new chemistry
- High cost of new pesticides
- Increased environmental and OH&S regulations
- Restrictions and / or loss of pesticides
- Maximum Residue Limit (MRL) / residue issues / violations
- Market requirements - Export
- New and emerging pests & diseases
- Pesticide resistance
- Consumer expectations
Pesticide Registration Challenges – Market Failure

• The Australian market represents only 1-2% of the global pesticide market
• Market often fails to provide access to suitable registered pesticides for many use patterns (small market & low return on investment)
• Problematic cost/benefit to register minor use when full data packages are required
• Prolonged timeframes can be involved to secure a minor use registration
APVMA National Permit System

• The APVMA’s National Permit System adds some flexibility to the approval process and provides a legal framework that can allow access to products for minor-use purposes.

• To issue an off-label permit, the APVMA must be satisfied the proposed use will be effective and will not have any adverse effects on humans, the crops, the environment and where relevant trade.
Permit Applications

To satisfy the APVMA an application has to have addressed the statutory criteria (safety, efficacy & trade), by using one, or a combination, of the following methods:

• Providing relevant data (efficacy & safety, residues & trade, OH&S & environment)
• Providing a valid scientific argument (extrapolation)
• Using overseas data assessments and decisions
Minor-Use Permits

APVMA Registration Statistics

• Approx. 2/3 of the total volume of pesticides used in Australia is in grain crops

• APVMA receives about 250 permit applications per year,
  • 40% are for renewals

• 900-1000 permits are currently in force
  • 80-90% are for generic products

• 60% of applications are for horticulture; 10-15% are for broad acre crops

• 85% of applications have no trial data submitted and are assessed without provision of new data

• 85% of minor use applications require residue trial data to be provided for renewal

• 2/3 of new plant commodity MRLs come from minor use permits
APVMA Decision

• Issue of a permit – Notification plus any requirements for permit renewal
• How long is a permit issued for?
  - Minor-Use (3 years) with data requirements for renewal
  - Minor-Use (4 -10 years) no outstanding data requirements
  - Emergency Use-Permit (period necessary)
  - Research Permits (1 to 2 years)
Export / Trade and Chemical Review
Challenges

Disparate approaches to MRL setting domestically and for import tolerances between countries;

• Varied processes for gaining import tolerances
• Data assessments
• Fees and data requirements
• Who can apply
• Timelines for assessments
• Differing default MRL’s
• Differing commodity classifications
Export Compliance

Negative

• Lack of or different use patterns leading to different MRL’s
• Can preclude use in export crops

Positive

• Where Codex MRLs recognised/adopted
Import Tolerances

Negative

• Gaining an import tolerance can be complex, expensive and difficult to achieve (data requirements, fees etc)

Positive

• Where Codex MRLs recognised/adopted
Regulatory Methodologies

Negative

• Differing risk philosophies can impact chemical review & new chemistry assessment outcomes causing a disconnect
• Differing toxicological end points (ADI & ARfD)
• Differing residue definitions – residue trial data and MRLs don’t match between countries

Positive

• Where JMPR recommendations accepted/adopted
• Accepting Codex MRLs
By working together we hope to ensure a sustainable and productive industry for future generations.

Thank you
How Growers Face the MRL Challenge

GLOBAL MINOR USE SUMMIT 3
OCTOBER 3, 2017, MONTREAL, QUEBEC, CANADA

MATT LANTZ
VICE PRESIDENT, GLOBAL ACCESS
BRYANT CHRISTIE INC.

DR. CAROLINE HARRIS
Corporate Vice President, Center
Director & Principal Scientist
Exponent International Ltd.
What We Hope You’ll Come Away With

- How Commodity Groups Approach MRLs
- Areas of Challenge for MRLs
- Positive Developments and Areas of Cooperation on MRLs
What We All Want to Avoid…
I. How U.S. Commodity Groups Approach MRLs

• Major Transitions
• Day-to-Day Issues
A. MAJOR MRL TRANSITIONS

Taiwan MRL regulation small list; no deferrals; no default

Canada new MRL protocols; future elimination of 0.1 default MRL

EU community-wide MRL standards established

Hong Kong national regulation

GCC major new MRL regulation (Bahrain; Kuwait; Oman; Qatar; Saudi Arabia; UAE)


MRL focus is low

Japan new MRL regulation; no deferrals (default = 0.01 ppm)

China begins efforts to set 10,000 new MRLs by 2020

Customs Union new MRL regulation (Russia; Belarus; Kazakhstan)

South Korea new MRL regulations (full implementation 2019)

Other markets with new MRL regulations pending: Mexico; Morocco; Peru, Dominican Republic
A. Major Transitions: U.S. Industry Actions

• Assess MRLs Used and Missing in Foreign Market
• Relevant List of Needs: Even if MRL Missing - Possibly Not Issue
• Seek MRLs: Various Systems Employed
• Cooperate with U.S. Government During Transitions
• Engage Early
B. Day-to-Day MRL Issues

- Pro-active Daily Work
- MRL Monitoring: WTO Notices; Providing Comments
- Work with Registrants on new Compounds
- Work with IR-4 on new MRLs
- Assist with Residue Violations
II. Areas of Challenges Growers Face with MRLs

- Timing of MRL Approvals
- Differing Data Requirements
- Generic Products
- Challenging and Out-of-Proportion Sanctions Policies for Violations
- Insufficient Time to Comment or Ignoring Comments
- Codex Resources (improving)
III. Positive MRL Developments and Areas of Cooperation From Our Perspective

- Elevation of MRL Issue
- Unintentional Trade Barrier
- Success in Major Transitions
- Improvement in WTO Notifications
- Availability of Data
- International Commodity Group Cooperation
- Codex Resources
MRL Resource

- GlobalMRL.com
- All International MRLs
- Updated Daily
- 100+ Markets
- 900+ Active Ingredients
- 700+ Commodities
For More Information on MRLs and International Trade:

- *Declining International Cooperation on Pesticide Regulation; Frittering Away Food Security*
Thank You!

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