



# RESIDUES WORKSHOP

## THE CURRENT AND FUTURE CHALLENGES

**16-17 OCTOBER 2017**

Sheraton Brussels Airport Hotel  
1930 Brussels; Belgium

Workshop organised by:



*With support of:*



# THE AIM OF THE WORKSHOP

In cooperation between ECPA and FoodDrinkEurope, we would like to invite you to our European Residues Workshop.

With important challenges in the European regulatory framework for the setting of Maximum Residue Levels, this Workshop brings together the key players with a stake in the application of the legislation – from the evaluation process to regulatory decision making – and from ‘field to fork’

The Workshop will look at how to promote a better understanding of the main challenges and to consider how these challenges can be efficiently managed. The presenters and participants in the workshop will include regulators (from the European Commission, EFSA and Member State authorities) and stakeholders from throughout the foodchain.

The workshop will also consider the current and future challenges linked to Regulation 396/2005 – reviewing the progress that has been made and the issues that still need to be resolved. Technical and scientific challenges will also be discussed – as will the global developments linked to the setting of residue levels in food.

2017 will see a start of a process to review the functioning of Regulation 396/2005 – and how it fits with the EU’s framework for the authorisation of pesticides, under Regulation 1107/2009. The workshop will therefore provide an opportunity to consider the options for the future – is there an opportunity for Better Regulation to provide a streamlined regulatory framework that ensures food safety and provides clear trading standards for food and feed?

# Objectives of the Residues Workshop

Jean-Philippe  
AZOULAY



Mella  
FREWEN



*Mella Frewen of FoodDrinkEurope and Jean-Phillipe Azoulay of ECPA tell us about their aims and objectives for the workshop. With the food industry and the pesticide industry dealing with the issue of residues in an unpredictable environment; they also tell us what ECPA and Food Drink Europe are doing to promote a workable regulatory framework.*

*ECPA and Food Drink Europe are cooperating in the organisation of the Residues Workshop. Tell us why you are working together?*

*Jean-Philippe:* The food industry is a key partner for ECPA and the crop protection industry and this workshop is one important element of our co-operation in promoting a workable and predictable regulatory framework. We face some common challenges in dealing with residue issues; what better way to address those common challenges?

*Mella:* The food industry uses agricultural raw material for the production of compound food. We therefore care greatly about the availability of raw material, which is in compliance with regulatory requirement. This is why we work together with ECPA.

*What is the main challenge in the EU MRL process that needs to be addressed in this workshop?*

*Jean-Philippe:* There are two main regulatory challenges that are to be addressed in the workshop: harmonisation and transparency. Given that the setting of MRLs provides an important framework for global trade, we need for a high level of **global harmonisation**. While some progress in harmonisation have been achieved in the last decades, we see many recent measures that are very unhelpful to the harmonisation goal. For example, the EU cut-off criteria and the development of separate EU guidance such as for Cumulative Risk Assessment could have a negative impact—we need to find ways of ensuring that harmonisation is a key consideration in these procedures. With the complexity of the regulatory system, there is

a need for a high level of **transparency** to ensure that stakeholders understand the process and are able to react when there are legislative changes, in particular changes in MRLs. The crop protection industry has a role in helping our partners to understand this process but we need the support of the regulators. This was the main conclusion from our discussions at last year's workshop and we have seen progress. I hope we can make further progress in the near future and the workshop provides an opportunity to look at the way forward.

*Mella:* Indeed the complexity of the regulatory system is challenging in particular when legislative changes follow plant protection products risk assessments. In such circumstances the food industry needs to know at the earliest possible stage what the impact on the production of compound food could be. Maximum transparency of risk managers is therefore necessary to anticipate the impact and to prevent unnecessary burden for the food industry. The latter is particularly important in case plant protection products are not reapproved and alternative substances might not be available to overcome the gap from one harvest to the next harvest, which may eventually lead to raw material shortages, particularly where EU & third country farmers have limited available alternative plant protection. Other challenges relate to situations where raw material is already treated at time of MRL change and products exceeding revised MRL are in store/on shelves or where traded raw materials have different crop cycles & lengthy transport times.

*What are your expectations from the workshop?*

*Jean-Philippe:* I have a strong expectation that we make some real progress in this workshop; that we identify key issues with solutions that can be put in place to improve the process. We have seen some progress on transparency issues since last year's workshop, I am sure that other issues will come up this year. With the review of the legislation, there is an opportunity to look for new solutions to improve the EU's legislative process – the workshop is therefore a perfect opportunity to discuss the improvement options! I also would like to hear about how we can address the communication challenge that we are all facing. We have made progress in this area but I believe that further progress can be made by working together.

*Mella:* Clearly this workshop will contribute to an exchange of views with concerned partners of the supply chain but also consumers and most importantly risk assessors and risk managers. The aim is clearly to minimise the burden on supply chain partners and therefore on the food industry, but always with the greatest care: we would of course never put consumers' health at risk, even in case MRL changes have to take place.

# PROGRAMME

## *Day 1 - Monday 16th October*

- 13:00 • Workshop registration
- 13:45 • Chairman's welcome (**Chairman: Rob Mason, Exponent**)
- 13:50 • Introduction by ECPA - **Jean-Philippe Azoulay**

### **SESSION 1: THE EU MRL EVALUATION PROCESS AND THE IMPLEMENTATION OF THE CURRENT LEGISLATION**

- 14:00 • Regulation 396/2005 – Latest developments, key implementation challenges and improvement opportunities in the legislative review - **Almut Bitterhof, DG SANTE**
- 14:25 • EFSA: MRL evaluations: Current developments and future challenges - **Hermine Reich, EFSA**
- 14:50 • National experience in implementation of Regulation 396/2005 **César Casado de Santiago, AECOSAN, Spain**
- 15:10 • MRL setting: Current practices, challenges and opportunities in the EU evaluation of MRLs - **Vassilia Sgouri, Bayer**
- 15:30 • Panel discussion
- 16:00 • Break

## SESSION 2: IMPLEMENTATION OF THE MRL LEGISLATION THE KEY CHALLENGES AND IMPROVEMENT OPTIONS

**Chairman: Euros Jones, ECPA**

- 16:30** • Agri-food chain view point: Current challenges and future improvements - **Raquel Izquierdo de Santiago, Chair of Agri-food chain roundtable**
- 16:40** • Introduction to the specific challenges faced by various food chain actors - **Beate Kettlitz, FoodDrinkEurope**
- 17:00** • Panel discussion  
To discuss the case studies and challenges faced by food chain actors.  
With participation of FoodDrinkEurope and other food chain representative.
- 17:50** • Farmer expectations – **Luc Peeters, COPA COGECA**
- 18:00** • Key challenges in food commerce - **Els Bedert, Eurocommerce (tbc)**
- 18:10** • **Panel discussion**
- 18:30** • Closing remarks on World Food Day - **Mella Frewen, Food Drink Europe**
- 18:40** • Cocktail followed by Workshop Dinner

## Day 2 - Tuesday 17th October

### PARALLEL WORKING SESSIONS

#### Training on the EU residue evaluation system

(Lead: FoodDrink Europe)

Chair: **Yves Le Bail-Collet, Cargill**

#### Update on scientific and regulatory issues

(Lead: ECPA)

Chair: **Rob Mason, Exponent**

#### 08:50 Chairman's welcome

#### Chairman's welcome

#### 09:00 Four speaker options (three speakers to be confirmed):

- Key challenges in understanding the EU residue evaluation process
- **Romans Vorss, FRUCOM**
- Explaining the science and the process for MRL setting - **Claire Stephenson, Exponent**
- Member State role in the evaluation and decision making process for MRLs - **Julian Cudmore, UK CRD**

#### Presentations:

- Looking at harmonisation opportunities – the Euromix project and JMPR considerations - **Professor Angelo Moretto, Uni. Milan**
- Cumulative risk assessment in the EU and the review of the IESTI methodology in Codex: challenges and advantages. - **Bernadette Ossendorp, RIVM**
- Risk Management view on residue definition and Cumulative Risk Assessment - **Karsten Hohgardt, BVL Germany**

#### 10:00 Panel discussion with panel members and:

- **Michael Kaethner, Bayer**
- **Hermine Reich, EFSA**

#### Panel discussion with panel speakers and:

- **Monika Bross, ECPA**
- **Julie Chao, USDA**

#### 10:45 Coffee

#### Coffee



### SESSION 3: CHALLENGES FOR IMPORTS FROM THIRD COUNTRIES (TIME: 2H20)

- 11:10 • Facilitating Trade Using Scientific Risk-Based Approaches  
**Doug Forsyth, Executive Director of the Strategic Trade Policy Division, Agriculture and Agri-Food Canada (AAFC)**
- 11:30 • Presentation from third country farmer exporting crops to EU  
**Gabriele Ludwig, Almond Board of California.**
- 11:50 • Import tolerances and hazard criteria: What impact on global harmonisation and trade in agricultural products:  
**Euros Jones, ECPA**
- 12:10 • Panel discussion  
To discuss the issues faced by importers and exporters.  
Panellists including:  
**Kevin Bosc, COCERAL**  
**Gaston Funes, Argentinian Mission to the EU**  
**Julie Chao, USDA**
- 12:40 • Pre-lunch break  
  
**Lunch panel discussion: Review of Regulation 396/2005**
- 13:00 • Panellists:  
**Ian Wheals, Syngenta**  
**Karsten Hohgardt, BVL, Germany**  
**Jeroen Meeussen, EU Minor Uses Coordination Facility**
- 14:15 • Concluding remarks
- 14:30 • CLOSE

# With or without pesticides?



Up to

# 40%

of global crop yields  
are lost to pests and  
diseases every year.

These losses could  
double without  
pesticides.

Consider the facts.

**[ecpa.eu/with-or-without](http://ecpa.eu/with-or-without)**

Source: European Union, European Parliament. (2015), Draft Report on Technological solutions to sustainable agriculture in the EU (2015/2225(INI)).

Source: OECD/FAO (2012), OECD-FAO Agricultural Outlook 2012 – 2021, OECD Publishing and FAO.



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THAT EVERY  
CRUMB COUNTS**



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ON THE JOURNEY  
TO SUSTAINABILITY**

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# BIOGRAPHIES

## JEAN-PHILLIPE AZOULAY

Born in France, Jean-Philippe Azoulay is Director General of the European Crop Protection Association, representing the crop protection industry in Europe. A Mechanical Engineer by training, with an MBA obtained in 1988, he spent 26 years working for DuPont in various senior roles, latterly as the Global Director of DuPont's Nutrition business. Having lived in numerous countries around the world, Jean-Philippe has a global view of the challenges facing the future of food and agriculture, and is passionate about the role that the private industry can play in providing innovative solutions to answer society's biggest challenges.

## ELS BEDERT

Els Bedert works as advisor on Food and Non-Food policy at EuroCommerce, the European voice for retail and wholesale. Els dedicated a large part of her career to development cooperation to improve food safety and food security for livestock keepers in Africa. In 2008 she moved to the European Commission's Directorate for Enlargement, as team leader responsible for TAIEX assistance on EU law related to agriculture, veterinary, phytosanitary and food safety to public administrations in (potential) candidate countries. In 2012 she joined EuroCommerce to focus on advocacy related to European product policy. Her academic background is veterinary medicine.

## ALMUT BITTERHOF

Almut is a food chemist. She graduated in 1994 from the University of Münster, Germany. She started her career in the Commission in 1999 in the area of food safety audits and inspections. From 2004 onwards Almut dealt with different policy files including legislative work on contaminants and pesticides. Since March 2015 she is deputy Head of the Unit of Pesticides and Biocides dealing in particular with all matters related to pesticide residues.

## CÉSAR CASADO DE SANTIAGO

César got his degree in Veterinary Science from the Complutense University of Madrid in 2001. Shortly after that, he became Official Veterinarian and started working for the Spanish Ministry of Health. He has developed his career in the Administration as officer of the Directorate for Public Health, dealing with import controls and then joined AECOSAN as head of Service of pesticide residues and veterinary drugs residues in food. Currently he is charge of the Unit for chemical risks in food (residues, contaminants, additives, food contact materials...)

## DR. JULIAN CUDMORE

Julian Cudmore has worked for the Chemicals Regulation Division (CRD), formally PSD, of the Health and Safety Executive (HSE) since 2006. Julian is a pesticide residue and dietary exposure specialist. Within CRD he has primary responsibility for MRLs and is the UK's technical representative on the standing committee of Plants, Animals, Food and Feed (SCoPAFF – Pesticide Residues). While working at CRD Julian has delivered training to international audiences on consumer exposure assessments for pesticides and has been involved in codex working groups, the JMPR and EFSA peer review meetings. Prior to joining CRD, Julian worked in the food industry. He has a degree and Ph.D in analytical chemistry.

## MELLA FREWEN

Director General of FoodDrinkEurope, representing Europe's largest manufacturing industry, since July 2007. Mella Frewen's previous positions include Director for Government Affairs EMEA at Monsanto, dealing with agricultural biotechnology, conventional agriculture, seeds and agri-chemistry. Prior to that, she was Director, International Relations for Cerestar, then Europe's biggest starch producer. Ms Frewen has represented the Food Industry in the several EU Commission Advisory Committees and Standing Committees. She is currently member of the EU Commission's High Level Steering Board for the European Innovation Partnership for Agricultural Productivity and Sustainability, of its Scientific Jury for EUCYS (Competition for Young Scientists) and of the EU Commission's TTIP Advisory group. She is also Co-chair of the European food "Supply Chain Initiative" (SCI) for fair business practices across the food chain. She has worked in the Agri-food sector in Europe for 27 years. She has a Master of Science degree from the National University

of Ireland, and completed a post-graduate course at the University of Brussels (ULB). She also holds a Harvard certificate on Agribusiness and an INSEAD certificate on International Operations Management.

### **DR. KARSTEN HOHGARDT**

Karsten works at the Federal Office of Consumer Protection and Food Safety in Braunschweig, Germany. He studied chemistry in Bochum, Germany. Since 1988 he worked in the field of authorisation of plant protection products and then worked for four years in the field of evaluation of residue behaviour of herbicides and plant growth regulators. Karsten then for ten years dealt with general questions regarding evaluation of the residue behaviour of plant protection products, working in MRL setting nationally, in EU and in CCPR. Since November 2002 he is head of unit 207 "Health" and is responsible for risk management concerning toxicology and residue behaviour in general. Karsten has worked on several projects in the past and the latest projects are magnitude of residues in fish and in honey and in OECD Research Chemistry Expert Group. The Federal Office of Consumer Protection and Food Safety was founded in 2002 and belongs to the Federal Ministry of Food and Agriculture. The main responsibility of the office is risk management, inter alia authorisation of plant protection products, authorisation of veterinary medicine, leading federal authority in the field of genetic engineering, risk management around food, feed and commodities, national and European Reference laboratories and cross-border protection of collective consumer interests (economic consumer protection).

### **RAQUEL IZQUIERDO DE SANTIAGO**

Raquel is the Secretary General of Europatat, the European Potato Trade Association. Europatat gathers national associations and companies involved in the trade of seed potatoes and ware potatoes from all over Europe. In this capacity, Raquel represents the interest of the sector at the European level in Brussels and other international settings. Raquel also collaborates with the fruit and vegetable sector via Freshfel (the European fresh fruit and vegetable association) and WAPA (the world apple and pear association). She is the current Chair of the Agri-Food Chain Roundtable for Plant Protection. Raquel holds a Law Degree from the University of Salamanca in Spain, where she is originally from, and a Master's Degree in European Legal Studies from the University of Leeds in the UK.

## **EUROS JONES**

Euros has worked for the European Crop Protection Association (ECPA) since May 2001, and has held the post of Director, Regulatory Affairs since January 2006. Euros holds a bachelor's degree in Agricultural Economics from the University College of Wales, Aberystwyth. He has worked in Brussels since 1994, having previously worked as Deputy Director of the Brussels office of the UK National Farmers' Unions, and as Secretary General of the European Council of Young farmers (CEJA). In his current post, Euros' responsibilities include supporting ECPA's advocacy on regulatory issues, with a particular focus on the implementation of Regulation 1107/2009 on the Placing of Plant Protection Products on the Market.

## **BEATE KETTLITZ**

Beate completed her studies of food chemistry at Humboldt University in Berlin in 1975. After this she took on the role at the Hygiene Inspection Services in Potsdam and was in charge of foodstuffs. After the successful achievement of a special professional certificate in the field of hygiene practice in 1978, she continued her professional engagement in the Regional Hygiene Institute of Potsdam. Beate became responsible for the control and professional advice for various foodstuffs. After her arrival in Brussels in 1991 she worked as an adviser on technical regulatory aspects for the food industry. As of May 1999, Beate started her professional career as a food policy adviser at BEUC, which lasted until April 2005. In April 2005 Beate joined FoodDrinkEurope (former CIAA) as a Director for Food Safety, Science and R&D.

## **YVES LE BAIL-COLLET**

Yves has worked for Cargill since 2002 and currently holds the position of Director, Regulatory & Scientific Affairs EMEA. He studies Veterinary medicine at the Ecole nationale vétérinaire d'Alfort and completed his studies in 1997 with a Master's Degree in Business Law from the University of Paris I: Panthéon-Sorbonne.

## **GABRIELE LUDWIG**

Gabriele has been working for the Almond Board of California for some 12 years. The Almond Board of California is a federal marketing order under the supervision of the U.S. Department of Agriculture. The Almond Board focuses on research and generic marketing of almonds and is

funded by a grower assessment. In her role Gabriele gets to combine her passion for agriculture and the environment with research and policy. As Director for Sustainability and Environmental Affairs, she was instrumental in the development of the California Almond Sustainability Program, and continues to encourage a diverse range of research on almonds and environmental issues. Gabriele has spent over 20 years working on state, federal, and international pesticide issues. She is a recent past member of EPA's Pesticide Program Dialogue Committee, the Minor Crop Farmers' Alliance, is Board Chair of the non-profit Coalition for Urban Rural Environmental Stewardship (CURES), and serves on several government agencies' advisory committees. Prior to joining the Almond Board, she worked for the consulting firm Schramm, Williams & Associates in Washington, DC. She received her Ph.D. in plant physiology from the University of California, Davis and her B.A. in Biology from Wellesley College.

## ROB MASON

Rob Mason joined Exponent International in 2014 after over 25 years with the UK pesticides regulator (now Chemicals Regulation Directorate (CRD) of the Health and Safety Executive). During that time he had a variety of roles including management of product and active substance applications and heading the enforcement team. His last job prior to leaving was Head of Regulatory Policy. For a number of years he was part of the UK delegation to the Standing Committee in Brussels and was part of the UK delegation to the Council for the negotiation of Regulation 1107/2009. He also spent 6 months working for the European Commission. At Exponent Rob works with a range of clients on regulatory strategy and dossier preparation and submission for active substances and products.

## PROFESSOR ANGELO MORETTO

Angelo Moretto is Associate Professor of Occupational Medicine, Department of Biomedical and Clinical Sciences at the University of Milan, Italy, and Director of International Center for Pesticides and Health Risks Prevention at Luigi Sacco Hospital, Milan. Angelo's interests and activities include Risk assessment of chemical exposures, including specific experimental studies, with specific interest in pesticides, pesticide metabolites and mixtures. Angelo is a member of many international committees for the risk assessment of exposure to chemicals, in particular pesticides, and for the improvement, harmonization and innovation of



risk assessment methods. He is referee of research projects for several governments and institutions, and has been an invited speaker to several meetings relating to toxicology and chemical risk assessment. Angelo is the recipient of several research grants from National and International bodies, related to toxicology, risk assessment and toxicology training.

### **DR. BERNADETTE OSSENDORP**

Bernadette received her PhD in Biochemistry at Utrecht University in the Netherlands in 1992. She continued her research activities for another 5 years as a post-doc researcher. Since 1998, she worked at the Dutch National Institute for Public Health and the Environment (RIVM). At first she was involved in the dossier evaluation of pesticide residue data and the derivation of MRLs including consumer risk assessment. She used the experience gained as scientific advisor on pesticide risks, both on the national level for Dutch policy makers and on the international level as Panel Member of the FAO Panel of the Joint FAO/WHO Meeting on Pesticide Residues (JMPR, between 2000 – 2010) and as Panel Member of the European Food Safety Authority (EFSA) Panel on Plant Protection products and their Residues (PPR panel, between 2006 - 2015). In 2009 and 2010, she has chaired the FAO Panel and from 2012 – 2015 she was the chair of the EFSA PPR panel. Bernadette initiated the WHO Collaborating Centre on Chemical Food Safety at RIVM which became operational in May 2013. She attends the Codex Committee on Pesticide Residues (CCPR) in an advisory role to the Dutch Ministry of Health. Since 2007 she headed several departments within RIVM, currently she is head of the department for Food Safety. She is therefore broadly oriented on the risks of chemicals in food, not only on the risks of pesticide residues but also those of a.o. (environmental) contaminants, additives, and veterinary drugs.

### **LUC PEETERS**

Luc Peeters is working in the fruit and vegetables sector since 1984 after holding several positions in animal farming industry. Previously, for 15 years Luc held the position of general manager of research and development centre for vegetable crops, including responsibility for implementation of national food safety monitoring system for fruit and vegetables. From 2004 – 2012, Luc was a member of the management team of Mechelen Auctions, holding responsibility for external relations, food safety legislation, environmental topics and sustainability. Since the merger with several other auctions to BelOrta in 2012, Luc became

member of staff responsible for external relations. From 2006 onwards, Luc has been the Chairman of the COPA-COGECA Phytosanitary Working Group and active member of several industry working groups and consultation platforms. Luc is also a member of the EFSA Stakeholder Consultative Group on Emerging Risks.

### HERMINE REICH

Hermine Reich is working for the European Food Safety Authority (EFSA) which is located in Parma (Italy) as senior scientific officer in the Pesticides Unit. She has a background in food chemistry and food technology. In her current position she is responsible for the implementation of Regulation 396/2005, in particular the risk assessment of pesticide residues in the framework of setting legal limits for residues in food, a review programme for maximum residue levels (MRLs), the drafting of the pesticide monitoring report and risk communication issues.

### DOUG FORSYTH

Doug Forsyth has been with Agriculture and Agri-Food Canada (AAFC) since 2009 and joined the Trade and Negotiations Directorate as the Executive Director of the Strategic Trade Policy Division in April 2011; prior to this he was the Director of the Animal Sector Policy Division in the Strategic Policy Branch. Before joining AAFC, Doug worked at the Privy Council Office from 2001-2008, mainly working on economic issues in Intergovernmental Affairs. He spent the early part of his career at the Department of Foreign Affairs and International Trade in the tariffs and market access division working on trade agreements such as the North American Free Trade Agreement, the Canada-Israel FTA, the Canada-Chile FTA as well as various accessions and trade disputes at the World Trade Organization. He has also worked at the Department of Indian and Northern Affairs, Industry Canada and the Canada Border Services Agency. Doug holds a Bachelor of Commerce degree from Carleton University and an MBA degree from McGill University.

### VASSILIA SGOURI

Vassilia has been working in the plant protection area and in particular the area of the Development and Registration of PPPs for more than 30 years. Vassilia worked for 15 years in the Regulatory Affairs and the development of new compounds in Rhône Poulenc Agrochimie SA in Greece. From 1997, Vassilia moved to Lyon in the European Zone - Regulatory Affairs headquarters, to assure different positions in the Residues

and MRLs Management in Europe, GLP Organisation, Minor Uses, Food Chain and Stewardship for Rhône Poulenc, Aventis and Bayer. Vassilia is a Dietary Safety Expert in Human Safety/Regulatory Science, where she supports and steers the implementation of regulations and guidance, particularly applying in the areas of Residues and Food Safety (Study planning, data preparation for MRLs and Import Tolerance, Consumers' safety evaluation, authorisation dossiers). Vassilia is a member of the ECPA residue Experts group and leading the MRL sub-group, especially involved in the European processes concerning MRL legislation and guidance in the field of safe food production, MRL setting and consumer safety.

### CLAIRE STEPHENSON

Claire joined Exponent International in 2014 as a residues and dietary exposure specialist. Prior to this, she worked for the UK pesticides regulatory authority, having primary responsibility for MRLs. She was the UK's technical representative on the standing committee on Plants, Animals, Food and Feed (SCoPAFF – Pesticide Residues) and at EFSA peer review meetings. Claire has a significant interest in dietary exposure assessment having contributed to developments in UK and EU risk assessment methodologies.

### ROMANS VORSS

Romans holds a Bachelor degree in Food Technology and a Masters in Food Chemistry. He also completed an Erasmus course at Ghent University. He has more than ten years of professional experience working for the food industry. Shortly after his graduation, he worked for several years in the Latvian Food and Veterinary Office. Since 2012, Romans has worked as a Senior Food Policy Adviser at FRUCOM, the European Federation of the trade in dried fruit, nuts, processed fruit and vegetables and processed fishery products.



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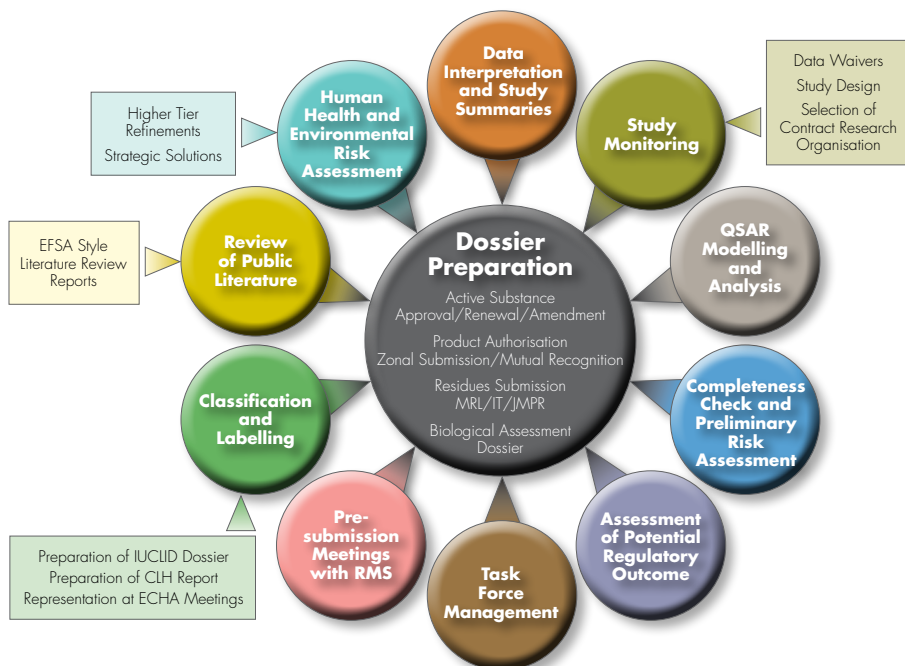
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Residue studies (crop, rotational, processing, post-harvest) / Soil accumulation and dissipation / Dust drift / DFR / Pollen and nectar / Field and semi-field studies on honeybee, bumblebee, osmia / Efficacy testing against varroa / Brood tests / Laboratory studies (acute and chronic toxicity) / Tailor made studies

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## Challenges for the food processing sector

Nigel  
THORGRIMSSON



Eva  
DE KEYSER

*Ardo's Nigel Thorgrimsson and Eva De Keyser explained to us about the importance of plant protection products for the production of high quality crops for the processed fruit and vegetable sector – and tell us about some of the key residues related challenges that they face.*

*What are the main activities of the Ardo Group and can you provide some figures to demonstrate the scale of the business?*

The family-owned Ardo Group is a leading European producer of fresh-frozen vegetables, herbs and fruit for Retail, Food Service and Food Industry markets, with production of 780 000 tonnes of frozen fruit, vegetables and fruit, produced and sold worldwide and a turnover of € 868 million in 2016.

With 20 production and packing sites located in fertile growing regions in eight European countries (BE, FR, NL, PT, ES, AT, UK, & DK), 87 different crops, grown by over 3500 farmers, on more than 50 000 hectares. Ardo has 3800 employees in Europe, including 55 Agronomists providing specialist technical support to the farmers growing the crops for Ardo.

*Ardo has been operating its MIMOSA Sustainable Agriculture programme, since 2012. Can you explain what the MIMOSA programme involves?*

Working with thousands of farmers, we grow many crops, in different Member States, where each country has its own unique list of authorised pesticides for each crop. The crops are sown, grown and harvested to a schedule, designed to supply the production lines of our factories with high quality field-fresh vegetables and herbs, picked at the peak of ripeness. Organising all of this is quite an achievement on its own, however we decided to challenge ourselves further, setting ourselves the goal of

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growing all of our crops with the maximum respect for nature and the environment, whilst remaining commercially competitive.

MIMOSA stands for Minimum Impact & Maximum Output Sustainable Agriculture and the programme captures our ambitions and establishes the principles on how we grow our crops. Our dedicated MIMOSA manager uses our custom-made framework to guide and support our agronomists and farmers across Europe, to achieve MIMOSA's main objectives:

1. Minimise the impact of our growing and harvesting activities on the environment.
2. Achieve optimal yields of excellent quality vegetables.
3. Provide attractive, economically viable returns for our farmers.
4. Support the personal safety and quality of life of our farmers and their employees.
5. Exceed our customers' expectations in terms of product quality and food safety.

To ensure Minimum Impact, we assess the potential impact on the environment and on people before undertaking any action - and we search for ways to ensure that any impact is as low as reasonably possible.

At the same time, we are looking at Maximum Output as sustainable Agriculture must be both productive and profitable, in order to meet the challenges of feeding an increasing global population and providing an acceptable income to farmers. Maximising the yield of top quality, safe and nutritious food produced from every hectare of land, is a key driver behind Ardo's MIMOSA programme, along with our support and guidance to farmers, to follow safe working practices in the field.

Year after year Ardo has been defining the optimal conditions for our crops. Our studies and field trials using a range of crop production variables, for a number of vegetables in different countries and climatic regions, is starting to deliver valuable information. The knowledge gained, is helping us to create the ideal growing conditions for healthy crops, and has led to a reduction in inputs of seed, fertiliser and plant protection products (PPPs). One of the key ambitions within MIMOSA is to reduce, and ultimately eliminate PPP residues from our frozen products. We plan to achieve this by using a combination of preventive and corrective measures (Integrated Pest Management) and creating the optimal

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conditions for a healthy crop. We also carry out specific field trials and comparing residue levels following the use of different PPPs at varied application rates, varied times of applications, in different sequences, and with different adjuvants.

*With Ardo being active in so many European countries, how does the EU pesticide legislation impact your business?*

Both of the framework European regulations play a role in defining the future success of companies like Ardo, that grow a range of fruit, vegetables and herbs, and who freeze these products to create foods with a long shelf-life.

Regulation 1107/2009 impacts on the availability of products and this is particularly crucial because all of the PPP minor uses for the speciality crops that we grow – and which require companies to develop and invest in the authorisation of PPPs. In today's Europe, the list of authorised PPPs for each crop that we grow, is different in each country we grow it. An uneven playing field exists, where farmers in one Member State have access to a range of PPPs for a target crop and target pests, weeds or diseases, whilst their fellow farmers in other MSs may have no authorised products to control the same pest on the same crop. This creates barriers to production unfair and competition between Member States and can also place European growers and fruit & vegetable processors at a disadvantage to farmers from third countries. PROFEL, the European Association of Fruit and Vegetable Processors, together with a number of other Agri-Food Industry Associations, is calling for a Single Zone Authorisation for Minor Crops. At Ardo we wholeheartedly support this initiative, which we believe would benefit European farmers, European fruit and vegetable processors, and European consumers.

Regulation 396/2005 defines the upper residue limits on our products. When Maximum Residue Levels are changed, this could lead to the withdrawal of food products from the market if these changes are not anticipated. Whilst fruit and vegetable processors are well equipped to conform to the pesticide residue legislation in place at the time of harvest/processing, they are not able to predict MRL changes that may occur during the shelf-life of their products. But producers of processed fruit and vegetables with long shelf-lives may be faced with unpredicted and unavoidable losses, if MRLs are revised downwards with just six months'

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notice before entry in to force. It is difficult to prepare a business plan, in the uncertainty that some of your products may need to be destroyed, as a result of decisions that are completely outside of your control.

*How could Legislation support companies like Ardo to achieve their sustainability goals?*

For our business, sufficient transition time are essential when changes are made to existing MRLs, taking into account shelf-life of the products. When there is no genuine risk for consumer safety, food waste, through product withdrawal and destruction must be avoided at all cost. The legislation should provide farmers with the access to the Plant Protection Products to achieve the yields they require for a sustainable business and being competitive with other regions in the world. We need consistency between Member States, creating a level playing field and giving farmers the same weapons to fight pests and diseases – and a single zone authorisation process would help! We also need to facilitate the development of new PPPs for Minor Crops, especially new active molecules – including biological products - that will provide lower residues, more selective control and other benefits for farmers and consumers.

*Do Ardo's customers ever request residue limits that are below those set in European Legislation, and what is Ardo's view on this topic?*

Our customers operate in a competitive market, where each one is obliged to defend their own position on price, quality, sustainability and a number of other aspects. This regularly leads to customers developing specifications that are stricter than EU legal requirements. The activity is not limited to pesticide residues, it extends to microbiological limits, nitrate, heavy metals and a number of other potential contaminants discovered by EU food research institutions. Even when demands are challenging to meet and have no scientific basis, Ardo's mission is to supply our customers with the product and specification that they require. Therefore we attempt to anticipate new requirements and adapt our activities to ensure that we meet them.

## Looking at global harmonisation of MRLs

*Tyler*  
**BJORNSON**



*Michael*  
**KAETHNER**



*Tyler Bjornson of the Canada Grains Council and Michael Kaethner of Bayer CropScience tell us about the opportunities for greater harmonisation - and the key players to make progress in this area in the coming years.*

*Global harmonisation of MRLs has been on the agenda for many years. Has there been progress?*

*Michael Kaethner:* Certainly progress has been made. For example, test guidelines and guidance have been developed and published by OECD and the Codex Alimentarius Commission adopt several hundred new MRLs as Codex Standards every year. At a more regional level, the EU now set MRLs for the EU-28, the US and Canada harmonize MRLs in North America and the ASEAN countries have so far adopted approximately 1000 harmonized MRLs.

But at the same time we observe an ongoing regulatory divergence between regions, e.g. the expected implementation of hazard based cut-off criteria which will impact MRL setting in the EU. Due to differences in national legislation and policies only 40% of proposed Codex MRLs are adoption without reservation. And, at the point of entry for traded commodities during border control most developed countries and a significant number of developing countries do not accept commodities with residues at Codex levels without having additional national provisions. This situation concerns the whole food value chain. On a positive note APEC members identified the need for more regulatory convergence and have issued an excellent Import Tolerance Guideline document. From an Industry point of view we welcome very much the initiative and looking forward to its implementation.

*Tyler Bjornson:* From a trade perspective this is a difficult question because the answer is both "yes" and "no". On the one hand, there is little doubt that progress has been made from a regulatory approval process

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point of view. We've seen helpful developments such as countries participating in Global Joint Reviews, the OECD MRL Calculator, significant achievements in crop groupings at CODEX and in the harmonization and best practice initiatives inside regional forums such as APEC. Progress can also be seen in the timelines to establish Codex MRLs and efforts are underway to further enhance the Codex process.

We also observe a trend, especially in fast developing and important importing economies, where more resources, expertise, and a desire to proactively demonstrate to its citizens that they are managing human health and safety matters has led to countries establishing their own MRL setting regulatory systems. While this is difficult to argue against, it is worrying that countries tend to establish "National Lists" that require individual approvals with no deferral to CODEX MRLs or other internationally accepted MRLs. This is a reversal from prior practice in many cases and an obvious step backward from global harmonization.

Also, the global agriculture supply chain is well aware of the pressures faced by some developed countries where the MRL setting process (including re-evaluations) is coming under intense scrutiny by civil society. This is resulting in an ever-tightening set of requirements that, at times, appear to yield results at odds with a science and risk-based MRL setting process. These changes can sometimes lead to drawn out approval timelines, increasing the unnecessary asynchronicity in MRL setting amongst major import and export markets in agricultural goods and therefore creates unpredictability and risk for those trying to move basic food products from regions of surplus to areas of need. The spectre of MRLs being set on a hazard-basis or unnecessarily set at the Limit of Quantification is also concerning and at times inter-related with public opinion challenges. This presents a serious risk to the free movement of goods and increases the likelihood that exporter and buyer will face technical barriers to trade.

*Who are the key players if we are to achieve progress?*

*Michael Kaethner:* In the EU, all policy makers – in Member States, Parliament and the Commission – have a responsibility to promote legislative changes to implement effective and a less bureaucratic system for MRL setting. The EU as a member of international organizations like Codex Alimentarius and OECD need to work with their counterparts



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outside the EU ensure that existing policies converge to remove unnecessary trade impediments. The Food Industry as well as the CP industry also has a key role to contribute and their ongoing engagement to support the Codex Alimentarius process is as critical as is the increased engagement of Codex members to provide more resources to support Codex.

The WTO - with its TBT and the SPS committees - plays a key role to watch compliance of national measures with international agreements. It is encouraging to see that they more recently discussed their stronger engagement in MRL related matters.

If we all manage that all trading economies understand international MRL harmonization as their common goal for the betterment of their own economic development as well as the safety for their consumers MRL harmonization will become an easier task.

*Tyler Bjornson:* National governments are key actors to both help improve the Codex MRL setting process as well as to put mechanisms in place to enhance the rate of adoption and use of Codex MRLs at the national level. Importantly, politicians must give regulators clear mandates to do truly science and risk-based assessments, and avoid regulation by popularity. While governments are ultimately responsible for implementing the solutions, it is critical that private sectors become more engaged with their national governments on the increasing need for global solutions. We need to ensure that governments realize this isn't just a problem for chemical manufacturers, but that it has a major impact on the millions of farmers and the tens of thousands of companies that move food products around the world. Most importantly, governments need to be made aware of the major effects that MRL related trade disruptions and barriers to trade have on importers and ultimately the consumers who will invariably pay the price for major inefficiencies in the food supply chain. This is a global challenge; developed and developing countries alike have a significant amount to gain through committing to global harmonization of MRLs.

## Importance of import tolerances for trade

Sandra  
VOGEL



*Import tolerances are needed to maintain trade with third countries and are particularly important for many minor crops that can't be grown in the EU but which we consume on a daily basis. But changes in import tolerance have resulted in major challenges for growers in exporting countries. Sandra Vogel of Syngenta tells us about a recent example which could impact mango exports to the EU.*

**A decision has recently been taken to remove the import tolerance for the use of thiabendazole in mango. Can you tell us more?**

Mango is a specialty crop that is not grown in Europe but instead is grown and imported from countries such as Peru, South Africa and Brazil so that it can be enjoyed by European consumers. Mangoes can be susceptible to post-harvest diseases, and growers and importers rely on fungicide treatments such as thiabendazole to ensure a supply of high quality, disease-free mangoes for the EU consumer. Brazil and Peru account for about 60% of mango imports into the EU and in these countries the alternatives to thiabendazole are limited. An EU MRL for thiabendazole on mangoes was established in 2008; this was set after an EFSA evaluation but was based on the internationally harmonised Codex MRL at 5 mg/kg, which was set in the year 2000. All thiabendazole MRL were however programmed for review in the EU and in EFSA's evaluation published in June 2016, it was concluded that there was inadequate data to maintain the import tolerance value for mangoes. As a result, the EU Standing Committee regrettably decided to withdraw the mango MRL for thiabendazole, the Regulation was published on 1st July and the lowered MRL level will apply from 21st January 2018. This will impact supply to EU consumers and will have negative consequences in the control of diseases and will lead to higher levels of food waste since the symptoms of diseases are only evident when the fruit ripens.

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*But surely, changes in MRLs and import tolerances are to be expected during the review of existing MRLs?*

Yes, we do expect that there will be certain changes to the MRLs during the review of existing MRLs but this conclusion for mangoes was unexpected and could not be predicted. The EFSA evaluation had not accepted studies that had been used to set the initial MRL and extrapolation from alternative data was also not accepted in the final evaluation. This change in the evaluation and the unexpected resulting proposal to amend the MRL only became clear at a very late stage and it was unfortunately not possible to generate and provide that additional data during the EFSA evaluation process.

Once the nature of EFSA's concern was understood, plans were put in place for new mango residue studies to be conducted. It should be highlighted that such trials take a substantial amount of time and in this case, the data is planned for submission in early 2018. As it takes an average 24 months to set a new Import Tolerance MRL, this will likely be the case for several years to come.

Were other policy options discussed prior to the removal of the MRL? One option that was discussed was the setting of temporary MRLs, which are permitted under the EU MRL regulation in certain circumstances in order to allow any scientific studies necessary for supporting an MRL to be undertaken and evaluated.

In this case, we believe that temporary MRLs would have been suitable as new data was being generated and it was possible to demonstrate no consumer safety concern based on monitoring data from several hundred samples in several countries consistently showing residue levels of less than 5 mg/kg in mangoes. A temporary MRL of 3 mg/kg was suggested by one Member State based on the analysis of National monitoring data, this proposal was however not accepted.

*What could be done to avoid similar experiences in the future?*

We do believe that some changes in the system would be helpful to better manage such unexpected changes in the MRL levels. An important step would be to have greater dialogue and transparency in the review process so that the basis of the recommendations are clear at an early

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stage, allowing stakeholders the opportunity to address uncertainties identified by EFSA and submit additional data in a timely way.

Measures are also needed to provide suitable transitional measures, in particular when a CODEX MRL remains in place. There is scope in the legislation to set temporary MRLs where these achieve the appropriate level of health protection. Consideration of monitoring data should also be an important part of the process as this provides important information that should be considered in the risk management process.

Suitable transitional timelines should also be provided to allow the evaluation of additional data and to allow growers, importers and the food industry to adapt to the new situation.

We hope that improvements can be put in place to ensure greater predictability in the process.



The European Crop Protection Association (ECPA) represents the crop protection industry at the European level. Its members include all major crop protection companies and national associations across Europe.



FoodDrinkEurope represents the European food and drink industry, the largest manufacturing sector in the EU in terms of turnover and employment. Its mission is to facilitate the development of an environment in which all European food and drink companies, whatever their size, can meet the needs of consumers and society, while competing effectively for sustainable growth..

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