Secondary Standards Today
Overview

I. What are they?
   - MRLs & Benefits of MRLs
   - Secondary Standards
     o What they are not
     o Benefits
     o Who is Establishing

II. Segment Engagement

III. Future for Secondary Standards

IV. Further Consideration

V. Impact of Secondary Standards
What is an MRL?

- Maximum residue level legally allowed for a defined chemical/crop combination. Based on residue trials conducted at the good agricultural practice (GAP) required to combat the insect, weed or disease effectively.

- Residue trials are conducted at the critical GAP:
  - maximum application rate and number
  - Specific timing of application
  - Minimum spray interval between application
  - Shortest pre-harvest interval (PHI)

- Set far below levels that could pose any risk to human health

Residue data is the basis for MRL setting
Benefits of MRLs

- Promotes fair trade among countries regardless of their stage of development
- Science based
- Risk based
- Transparent
- Opportunities to harmonize with international standards; important to developing countries
What is a Secondary Standard?

- Retailer private residue level, often set at 50 to 80% of legal requirement. They are used by retailers, predominately in Europe, to promote brand image and satisfy consumer perceived safety concerns.

- Secondary Standards are:
  - Market place response to consumer expectations
  - Based on marketing not trade rules between countries
  - Inconsistent & capricious; vary among retailers

- Not based on principles and guidelines of trade between countries (WTO, Codex)

- Undercuts national standards based on science requirements and regulations

- Likely to increase resistance; reducing the GAP will have an impact on crop yield and pest control.
What Secondary Standards Are Not

They’re not:

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

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

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

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

<table>
<thead>
<tr>
<th>Segment</th>
<th>Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Customer</td>
<td>Impact by scares (benzene/Perrier, melamine/milk, E.coli/spinach), media field day promoting fear, NGO encouragement, fascination with agriculture</td>
</tr>
<tr>
<td>5. Retailer</td>
<td>External pressure to satisfy perception: hyper-local sourcing(^1), transparency in safety</td>
</tr>
</tbody>
</table>
| 4. Processor, shipper/handler   | • consumable product must be perceived as healthy, natural, local, desirable  
• meeting domestic demand and requirements in export markets                                                                                                                                           |
| 3. Regulators                   | Doing complex assessments/reviews meeting laws and ensuring proper protection of environment                                                                                                                                 |
| 2. Crop Protection Industry     | tools to help grower, conduct numerous complex studies must meet regulatory requirements                                                                                                                                 |
| 1. Grower                       | nature, pest pressure, compliance with Federal & state regulations                                                                                                                                       |
The Future of Secondary Standards

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

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

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

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

May help growers meet international standards allowing access to a wider market
Can promote best practices
Protect brand image
Can result in a price premium for growers
Promote consumer confidence; increase demand for the commodity or product

Costs often carried by grower
The number and complexity of standards is confusing
Not science based and reduces public confidence in regulation
Could reduce crop yield and quality
Increases risk of pest and disease resistance
Lack external transparency
Try to make apparent food safety a competitiveness factor

Courtesy of Caroline Willetts
sources

## Comparison

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