# More Than a Number... MRLs from an International Beverage Company Perspective

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Ron Williams, Ph.D.
Principal Scientist
Global Scientific and Regulatory Affairs
Atlanta, GA



# Why is The Coca-Cola Company interested in MRLs?

# Two key drivers...

The ingredients that go into our beverages are largely derived from agricultural commodities.

Our products are available in more than 200 countries.



#### **Presentation Outline**

- Products and Commodities
- Pesticides and Regulatory Compliance in Agricultural Commodities
- Pesticide Monitoring Survey Data
- Moving Forward



# The Importance of Juice...

Globally, The Coca-Cola Company is the No. 1 provider of juices and juice drinks.



#### Coca-Cola Juice Brands – A Global Business





# The Coca-Cola Company produces and sells all types of juice products.....







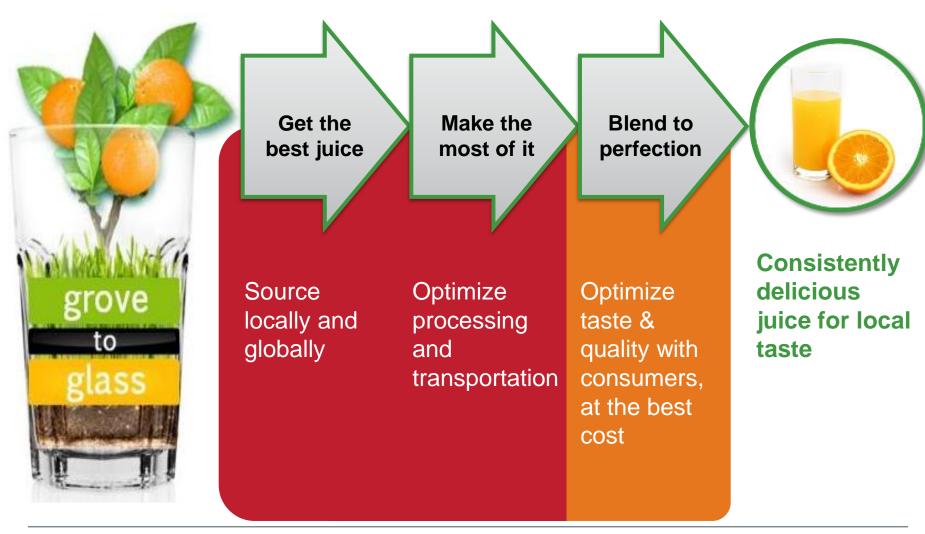








# Grove-To-Glass Operating System





#### **Ready to Drink Teas and Coffees**





























#### **Odwalla – Liquid Food Category**



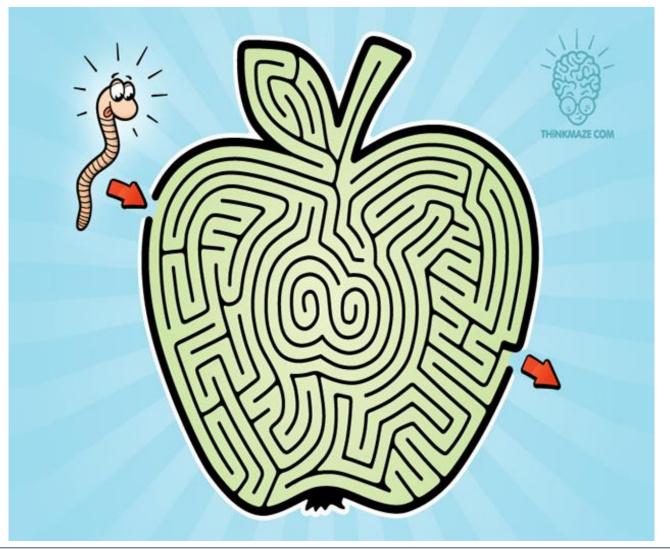
- Apple
- Carrot
- Grapefruit
- Orange
- Tangerine
- Mango
- Coconut

- Pumpkin
- Strawberry
- Grape
- Peach
- Lemon
- Raspberry
- Pineapple

- Blueberry
- Pear
- Pomegranate
- Lime
- Plum



# **Regulatory Considerations**





# **Residues and Regulations**

- Regulatory authorities establish and enforce allowable residues.
- Pesticide residues, when they do occur, are typically found at very low levels.
- Pesticide residues may or may not be detected on treated crops after harvest.

ALIMENTARIUS











## **Balancing Benefits and Risks**

#### **Benefits**

- Increased productivity and lower food costs
- Improved fruit and vegetable quality and appearance
- Longer shelf-life
- Public health issues (e.g., mosquito control)





#### Risks

- Worker exposure
- Soil and water contamination
- Non-target effects (e.g., beneficial insects, spray drift)
- Potential for residues in food



# **Establishing Tolerances and MRLs**

- Requires residue data from controlled field studies (maximum rate, number of treatments, minimum harvest interval)
- MRLs are subject to review and revision
- New registrations are expensive
- Growers and associations have significant influence with chemical manufacturers for new uses and tolerances





#### Codex - MRLs on an International Basis

Codex Committee on Pesticide Residues (CCPR)

- Prepares priority lists of pesticides for evaluation by the expert group at Joint FAO/WHO Meeting on Pesticide Residues (JMPR)
- Uses scientific advice from JMPR to establish maximum limits for pesticide residues in food and feed
- Used primarily by countries that do not have the regulatory resources to establish their own residue levels



# **Pesticide Residue Monitoring**





## **USDA – Pesticide Data Program (PDP)**

- Started in 1991
- 100+ commodities and 500+ pesticides
- Samples collected in 11 states
- From the 2011 Annual Summary...
  - 11,894 total samples
  - 0.27% exceed tolerance (78% imp., 22% dom.)
  - 3.4% no approved tolerance (70% imp., 30% dom
  - Orange juice (585 samples)
    - Carbaryl (22.2%)
    - Imazalil (6.3%)
    - Imidacloprid (5.8%)
    - Thiabendazole (9.6%)
- No illegal orange juice residues reported





#### Carbaryl Residues in Orange Juice – 2011 USDA PDP

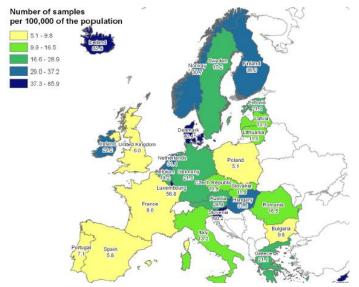
- 130 detections out of 585 samples
- 455 non-detects
- Range of detections: 0.003 0.018 ppm
- Average residue (when detected): 0.007 ppm
- Carbaryl/orange tolerances and MRLs:
  - ✓ US: 10 ppm
  - ✓ Codex: 15 ppm
  - ✓ EU: 0.01 ppm
  - ✓ Japan: 7 ppm





# 2010 EU Report on Pesticide Residues in Food

- 27 EU member states plus Iceland and Norway
- More than 77,000 domestic and imported samples
- 2.8% exceed MRL for one or more pesticides
- EU Coordinated Program: 30 major foods, 10/year on a three-year cycle, statistically based





# **TCCC Testing and Pesticide Residue Monitoring**

- Basic Attributes
  - Brix, acidity, color, turbidity, viscosity, etc.
  - Stability
  - Microbiology
  - Sensory
- Residues (screening >150 a.i.s)
- Heavy metals (arsenic, cadmium, lead)
- Adulteration
- More than 20,000 samples in 2012









# **Pesticide Residue Monitoring Summary**

- Detections of pesticide residues exceeding an established tolerance are rare
- In the US, the detection of unapproved pesticides, those for which a tolerance has not been requested and/or approved (or has expired) are still rare
- As a consumer facing business, we must be able to respond to reports of residues, and the differences between allowable residue limits from one country to another





**Moving Forward** 



# MRL Priorities for Food and Beverage Companies

Harmonization

MRL Needs

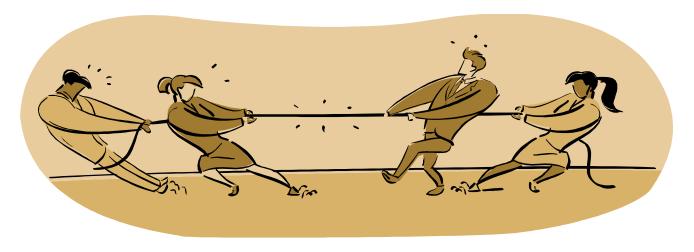
Partnerships





#### **Benefits of Harmonization**

- Simplify purchasing and distribution
- Flexibility in sourcing
- Simplify supplier messaging and requirements
- Consistent message to consumers





#### Tea: Additional Tolerances/MRLs Needed

- Tea Act of 1897 shielded tea imports from most regulatory agencies
- Revoked in 1996
- 2008 FDA detention of tea due to illegal pesticide residues
- FDA and Tea Association of the USA reached an agreement for enforcement discretion with good faith efforts to obtain tolerances
- Obstacles to new tolerances include: ownership and revenue for off-patent compounds, minor crop status in the US, new data generation requirements and expenses, registration fees and harmonization challenges.





## Tea Tolerances and MRLs: US, EU and Codex

- **US:** tea tolerances for 18 active ingredients
  - plus 19 food and feed storage/handling tolerances
- Codex: 16 current (1 revision and 1 new MRL proposed for 2013)
- EU: 40+ established tea MRLs and default MRLs for many other active ingredients

#### Comparison of Selected Tea Tolerances/MRLs

<b>Active Ingredient</b>	US Tolerance (ppm	) EU MRL (ppm	) Codex MRL (ppm)
Acetamiprid	50.0	0.1*	none
Bifenthrin	30	5	30
Buprofezin	20	0.05*	30 (2013)
Carfentrazone-ethyl	0.10	0.02*	none
Chlorantraniliprole	50.0	0.02*	none
Chlorpyrifos	none	0.1*	2
Clothianidin	70	0.7	0.7
Deltamethrin	none	5	5
Dicofol	50.0	20	<del>50</del> 40 (2013)

<sup>\*</sup> Indicates the lower limit of analytical detection.



# **Partnerships and Engagement**

- Suppliers and Growers
- Codex Committee on Pesticide Residues
- Trade Associations and Commodity Groups
  - Tea Association of the USA
  - FL Citrus Mutual
  - CropLife America
  - Juice Products Association
- Agrochemical Manufacturers













#### **Questions and Comments...**

Ron Williams 404-676-7035 ronaldwilliams@coca-cola.com Atlanta, GA

