



Quality & Conformity Fruit & Vegetables

PIP Magazine

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Magazine of the Pesticides Initiative Programme

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Exporting to Europe: the imperatives of the market

→ To gain access to the European market, ACP exporters must comply with European food safety regulations. Their European partners (importers/buyers/distributors) also impose specific requirements relating to quality standards. To make sense of the myriad of measures faced by ACP exporters, PIP magazine sought the help of two experts.

PIP Magazine

The PIP programme is pleased to introduce the newest member of its family, PIP Magazine. This quarterly is meant to supplement the monthly electronic PIP Info newsletter, distributed via e-mail. The PIP is managed by the COLEACP (Liaison Committee Europe - Africa - Caribbean - Pacific), an inter-professional association of the ACP Europe horticultural trade. PIP Magazine will aim to build on PIP's goal of providing information to ACP exporters and all its different partners. The 'In brief' section will cover the developments of the last few months and the 'Practical information' column will present a selection of interesting web sites and links along with a calendar of the most important events in the sector. Our 'Report' will look into a specific problem, offering specialists' insight and analysis. Lastly, PIP Magazine will cover action on the ground with a portrait of a PIP partner enterprise and a report on the progress the programme is making in the ACP countries.

www.coleacp.org/pip



→ In brief ...



COLEACP signs cooperation agreements with pesticide manufacturers

A Memorandum of Understanding was signed in June 2003 between CropLife International, an association of pesticide manufacturers, and COLEACP. The agreement stresses CropLife International's determination to take part alongside PIP in the process of placing ACP horticultural production into conformity with European pesticides residue regulations. Also in June 2003, PIP signed a partnership agreement with Syngenta. This agreement concerns a field trial programme set to lead to the completion of crop protocols and possibly to the preparation of Import Tolerance dossiers. Moreover, on 7 August 2003, a similar agreement was signed with DuPont de Nemours, and another with Dow AgroSciences on 29 September. Bayer has given its assent to an agreement expected to be finalised in the coming weeks.

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For more information:

- ▶ <http://www.syngenta.com>
- ▶ <http://www.croplife.org/default.aspx>

 For more information, see the PIP Info issue as mentioned

PIP pushes for harmonised approval procedures at regional level

In June 2003 PIP held discussions with several African regional organisations - with the ICDCS in Mali for the West Africa region and in Ethiopia with all the East African representatives under the auspices of CropLife Africa-Middle East - with a view to establish harmonised approval procedures for active substances in use. The aim is to set up a system where member countries belonging to a regional organisation would mutually recognise active substances approved in another. The principle of the system is elementary; it lies in national authorities using the same procedures to approve active substances included in the technical itinerary of a specific crop.

The system is to be arranged on a crop by crop basis with green beans to serve as a pilot crop. Some 20 countries are due to participate in this first phase of the pilot project. PIP will hold several more meetings in the 4th quarter of 2003 to proceed with these negotiations.

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Manufacturers withdraw their support for active substances

The manufacturer DuPont has withdrawn its support for Bromacil (a herbicide used for selective weed control in pineapple and citrus crops). Similarly, Bayer has denotified the substance Triadimefon (a fungicide used on cereals, fruits and vegetables against malignant mushrooms). In Africa both substances are used primarily on pineapple crops. One must remember that the use of these substances is prohibited in the EU not because of concerns about their impact on health or the environment, but for the simple economic reason that they are no longer supported by a manufacturer. In the case of triadimefon, the EU harmonised MRL of 3 mg/kg

on pineapple will be maintained, while residue levels for Bromacil may not exceed 0.01 mg/kg.

When these active substances lost the support of their producers they were consequently withdrawn from the list of active substances authorised for use in the European Union. This does not mean, however, that ACP growers cannot continue to use these substances on their crops nor that they can no longer export to the EU if they use them. But, to continue using such substances two conditions must be met: these substances must be authorised in ACP countries and residue levels may not exceed 0.01 mg/kg. If the latter is not the case, an Import Tolerance dossier must be submitted to EU authorities.

An import tolerance (IT) is an MRL for an active substance (a.s.) used on a commodity imported into the European Union. The application for an IT must contain information on residues, toxicology, risks to consumers and include a certification of authorisation for use in a producing country as well as a proposal for an MRL. Within the framework of the agreement between COLEACP-PIP and pesticide manufacturers, the latter have committed themselves to prepare and submit Import Tolerance dossiers to the European Commission and to follow them up until their final approval.

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Additional active substances removed from lists

In accordance with European Regulation 2076/2002, in July 2003, a further 68 active substances (in addition to the 320 already withdrawn) removed from lists 1, 2 and 3 (synthetic pesticides). Likewise, 100 substances were taken off list 4 (comprised of plant protection products such as micro-organisms, plant extracts and substances like sulphur or ethylene). These new cuts bring to 476 the number of active substances withdrawn, i.e. more than 50% of the initial list.

Citrus fruit: taking up battle positions over a modified MRL

The European Commission Directorate-General for Health and Consumer Protection (DG SANCO) has reviewed the MRL for the citrus fruit/2.4D combination. 2.4D is usually used as a herbicide on cereal crops. On citrus crops it is used as a 'growth regulator' to keep the fruit attached to the stem by the calyx.

In 2001, the Codex Joint Meeting on Pesticide Residues (JMPPR) decided to withdraw the MRL for this application, which at the time was 2 mg/kg, due to insufficient scientific data. A request for a new Codex MRL of 1 mg/kg was then submitted by citrus fruit growers. In parallel with the Codex decision to withdraw the MRL of 2 mg/kg for 2.4-D, DG SANCO chose to lower this MRL to 0.05 mg/kg (the limit of determination – LOD) from 1 July 2003, after receiving no comments from producers and having notified the Working Group on Sanitary and Phytosanitary Measures (SPS), a body of the World Trade Organisation (WTO).

Meanwhile, citrus fruit producers' organisations, with the support of COLEACP and FRESHFEL, submitted to the European Commission and to the rapporteur Member State, Greece, an application for a temporary MRL of 1 mg/kg. The working group on residues at DG SANCO, meeting on 19 June in Brussels, agreed in principle, but for practical reasons, decided to postpone its final decision.

At national level, however, the United Kingdom and Belgium have already approved the temporary MRL of 1 mg/kg, which entered into force immediately.



EFSA operational from May 2003

The European Food Safety Authority (EFSA) became operational in late May of this year. The Authority is responsible for scientifically assessing the safety of food in the European Union and within the framework of Directive 91/414/EEC, it will also take on the task of analysing submitted active substances notification dossiers. EFSA, which took over its mission from the European Commission, is made up of a number of scientific panels organised according to various themes such as food additives, plant health, genetically modified organisms, biological hazards, and animal health and welfare, among others. The panels are composed of scientific experts, but to date only a number of panels are operational which reduces somewhat EFSA's performance.

The European Food Safety Authority is headed by Geoffrey Podger. A permanent location has not yet been determined.

For more information, visit EFSA's website:

- http://www.efsa.eu.int/index_en.html (English)
- http://www.efsa.eu.int/index_fr.html (French)



Useful sites and links

COLEACP (Liaison Committee Europe–Africa–Caribbean–Pacific)

Practical information presenting the PIP programme and its activities in progress, explaining how to obtain support, summarising the latest developments on pesticides-related issues, regulations in force in Europe and in other countries of import and a documentation section explaining the programme's work.

- <http://www.coleacp.org>

DG Health and Consumer Protection (European Commission Directorate-General for Health and Consumer Protection)

In its section on plant health/pesticides safety, the site contains databases updated by the European Commission listing MRLs (Maximum Residue Limits) sorted by crop and by active substances.

- http://europa.eu.int/comm/dgs/health_consumer/index_en.htm

Secretariat of the ACP Group of States

Texts of treaties and agreements, of which the ACP-EU Partnership Agreement known as the Cotonou Agreement.

- <http://www.acpsec.org/>

Codex

The Codex Alimentarius Commission was created in 1963 by the FAO and the World Health Organisation to develop and coordinate food standards. The site includes the Codex databases, the calendar of forthcoming meetings, the working papers and reports of all Codex meetings, the list of members and addresses of Codex liaison services.

- http://www.codexalimentarius.net/index_en.stm

Diary

29/09 to 3/10 2003	Dakar, Senegal. PIP workshops – Training for Food Safety and Traceability Managers. Regional information meeting (2/10). Technical workshop on green beans and cherry tomatoes (3/10).
1 to 3/10 2003	Paris, France. Fresh 2003 Conference. Organised jointly by Freshfel Europe and Eurofruit Magazine.
13 to 17/10 2003	Accra, Ghana. PIP workshops – Training for Food Safety and Traceability Managers. Regional information meeting (16/10). Technical workshops on pineapple and papaya (17/10).

Exporting to Europe: the imperatives of the market

European regulations and market food safety requirements are creating more and more constraints for the business of exporting ACP horticultural products to Europe. For producers/exporters, however, it is not always easy to distinguish between legal requirements and those imposed by importers and distributors.

To protect public health and the environment as a whole, European authorities have in recent years adopted a number of rules aimed at foreseeing and better controlling food hygiene and safety risks. The effort involves improved quality standards and tougher control systems throughout the food chain, 'from the farm to the fork'. This strategy is based on the White Paper on food safety, in which the Commission proposes a package of measures aimed at making food safety a more coherent and integrated policy.

The rules concern European products and imports alike. Regulations on access to the European market concern three aspects:

- 1) conformity with marketing standards (e.g. labelling for control upon entry into the territory);
- 2) the use of pesticides and respect for maximum residue limits (MRLs); phytosanitary protection;
- 3) the use or marketing of genetically modified organisms (GMOs).

Legal requirements

Both market access and food safety requirements (safety, hygiene, traceability of goods) are subject to checks, starting with the regulatory authorities who carry out a priori controls on products: 'Exporting today simply requires meeting the demands of the official control bodies both in the export and import countries and obtaining a certificate of origin, a certificate of conformity and a

phytosanitary certificate', summarises Georges Champseix, Director of Ocacia, a certifying body based in France. Once the products have entered the territory and are introduced into the trade circuit, there can be other checks to guarantee conformity and corrective measures imposed where needed. These checks concern GMOs and MRLs for pesticides. 'Subsequent detection of non-conformity with MRLs does not necessarily lead to the refusal of the marketed batch, but can undermine the continuing trading relations between the exporter and his European partners', explains Georges Champseix. Indeed, if it is subsequently discovered that a batch of imported products is not compliant, this creates suspicions in regard to the exporter or the country of origin of the product, a precedent that could compromise future exports by ACP companies. The British have put out a black list of exporters whose products are not compliant.

In addition to the checks performed by the public authorities and other official bodies, regulatory provisions are also applied by companies in the food chain, which carry out voluntary checks and implement risk control measures (such as HACCP) and traceability procedures (mandatory from 1 January 2005).

The third safety net consists of the legal imperatives monitored by some buyers, importers and distributors. In fact, these so-called 'marketing' requirements are still firmly rooted in the legal framework since operators at this level ask the producer/exporter to prove that the goods are in conformity with European regulations. For



PIP: helping ACP companies comply with European food safety requirements

Set up by the European Union at the request of the ACP Group of States, the Pesticides Initiative Programme has two overriding objectives: to enable ACP companies to comply with European food safety and traceability requirements; and to consolidate the position of small-scale producers in the ACP horticultural export sector.

A partner to companies, the programme aims to provide support at every stage, bringing enterprises up to date on European legislative developments and helping them deal with practical matters such as adaptation of their methods and the human and financial means required to implement them.

* To learn more, see the ColeACP/PIP site at the following address:

► <http://www.coleacp.org/pip>

example: European regulations impose a set of marketing standards (product characteristics, packaging, labelling, marketing conditions). Certain buyers, however, are not content with these measures and ask all their suppliers to carry out microbiological tests or analyses of





contaminants. 'When developing legislation at European level, in normal circumstances there is close consultation between the different stakeholders, including operators in the marketing sector', explains Dr Canice Nolan, Head of the Pesticides Unit at DG Health and Consumer Protection (DG SANCO). 'However, it escapes no one's notice that the big distribution groups are extremely demanding. They have their own standards, often impose best agricultural practices on their suppliers and even set maximum residue limits that often are more stringent than European legislation! But these rules are imposed through private contracts between the distributor and the exporter. As far as we are concerned, as long as European legislation is respected we have no complaints.'

Making sense of quality standards

Finding oneself amidst the alphabet soup of quality standards is certainly an awesome and fastidious task. Of the dozens of standards used in Member States only a handful are widely employed throughout the European Union: ISO 9000, ISO 14001, GFSI, ETI, BRC, Eurepgap.

The overriding principle of quality standards is to provide European consumers with safe and quality produce above and beyond legislative imperatives. Each standard has its specific requirements focusing on one or several aspects of quality which are verified by independent certification bodies. Some may deal more specifically with limiting the impact production may have on the environment (ISO 14001), the way an enterprise is managed (ISO 9000) or the labour and human rights practices of a company (Ethical Trade Initiative – ETI). Other standards and benchmarks such as Eurepgap, BRC (British Retail Consortium), and GFSI (Global Food Safety Initiative) require Food Safety Management Systems (FSMS) to be put in place. They also have strict traceability requirements and call for the implementation of the Hazard Analysis Critical Control Point (HACCP) system. In addition to food safety requirements, Eurepgap also includes environmental protection and health and worker safety protection imperatives.

PIP does not in any way advocate a specific standard over another. Rather, PIP will provide appropriate support to ACP producers and exporters needing to comply with a particular quality standard if they so require.

EUREPGAP

► www.eurepgap.org

BRC (British Retail Consortium)

► <http://www.brc.org.uk/>

GFSI (Global Food Safety Initiative)

► <http://www.globalfoodsafety.com/>

ISO 9000

► <http://www.iso.ch/iso/en/iso9000-14000/iso9000/iso9000index.html> (English)

► <http://www.iso.ch/iso/fr/iso9000-14000/iso9000/iso9000index.html> (French)

ISO 14001

► <http://www.iso.ch/iso/en/iso9000-14000/iso14000/iso14000index.html> (English)

► <http://www.iso.ch/iso/fr/iso9000-14000/iso14000/iso14000index.html> (French)

Ethical Trading Initiative

► <http://www.ethicaltrade.org/pub/home/welcome/main/index.shtml> (English)

► <http://www.ethicaltrade.org/pub/resources/othlang/main/content.shtml#fr> (French documentation)



Further specific requirements

No complaints, indeed, on regulations, since the legal provisions mentioned above are compulsory and applicable to all. The second level is comprised of the additional requirements imposed by the importers and European distributors: *'To gain access to more lucrative markets, particularly in big distribution groups like Tesco (United Kingdom) or Carrefour (France), the producer/exporter is increasingly required to comply with a reference scheme or must meet the specific demands of buyers and importers'*; adds the Director of Ocacia. These specific requirements are of four types:

- 1) the organoleptic quality of the products (taste, colour, consistency, smell, etc.) and specific characteristics (religious, ethnic or ethical criteria);
- 2) protection of the environment and of wild fauna;
- 3) health, occupational safety and social protection (e.g. the requirements of ethical trade);
- 4) business management. In this case, it is the central buying office or an independent body that will check the products and issue a certificate.

These specific requirements are described at length either in specifications proper to mass distribution, in reference schemes referring to official quality labels (e.g. organic farming or 'Label Rouge' in France), or in BRC, GFSI, EurepGap, ISO 9000 or ISO14001 standards (see box on page 5).

Further details on the White Paper on food safety can be found on the following site:

► http://europa.eu.int/comm/food/fs/intro/index_en.html

MRLs and Traceability

The setting of pesticide residue limits (MRLs) for foods is one of the food safety measures taken by the EU. Along with European producers, ACP companies exporting fruit and vegetables to the EU are obliged to abide by European regulations. These are based mainly on Council Directive 91/414/EEC*, which seeks to guarantee that phytopharmaceutical products released on the EU market have no harmful effects on human or animal health or unacceptable environmental effects. More recently, the European Commission's Directorate-General for Health and Consumer Protection came forward with new proposals (COM 2003/0052 (COD) of 14/03/2003)* for the harmonisation at European level of maximum limits of pesticide residues for plant and animal products. This draft Regulation is aimed at simplifying and consolidating existing legislation.

The new text, set to enter into force in January 2005, will replace four basic Council Directives on residues (76/895/EEC; 86/362/EEC; 86/363/EEC; 90/642/EEC)*.

Another key to European legislation is traceability. It is based on two essential texts: Directive 93/43* on the hygiene of foodstuffs, the objective of which is to eliminate or reduce risks related to consumption, whether linked to the products themselves or to operations carried out on the products. Regulation 178/2002* stipulates in Article 18 that 'the traceability of food (...) shall be established at all stages of production, processing and distribution'. For the first time ever, traceability is made compulsory for all food products, from 1 January 2005. And finally in this panoply of measures there is also the regulation on organic agriculture (Commission Regulation No 473/2002 of 15 March 2002)*. *'We are well aware that the regulations can be unwieldy but these requirements must not be considered discriminatory against third countries. And it is precisely to facilitate the integration of all these regulations that we have launched programmes like PIP'*, concludes Canice Nolan, Head of the Pesticides Unit at DG SANCO.

* For access to all the regulations in force in Europe, visit the European Union's Europa site

► http://www.europa.eu.int/index_en.htm

and the Eur-Lex database

► <http://europa.eu.int/eur-lex/en/index.html>



Working with small producers in Kenya



'We are at a crossroads,' says Charles Muchiri, the Managing Director of Avenue Fresh Produce. 'The outgrowers we work with are not well trained and we don't know whether or not to continue working with them. If somebody helped us to train them and sensitise them on the requirements of our consumers I would really love it.'

Avenue Fresh Produce Ltd. is a producer and exporter of fresh fruits and vegetables based in Kenya. Avenue Fresh Produce exports about 600 000 kilos of fresh produce to the European Union (EU) every year, mainly loose and pre-packed fine beans and mange-touts and some passion fruit. Avenue Fresh has farms of its own spanning some 155 acres (62 hectares), but it also relies on the many outgrowers it has working for them. The 230 growers it works with, which are located in different regions across the country, have small to medium sized plots with the ability to plant anywhere from one kilo to fifty kilos of seeds.

'230 outgrowers is a lot of people to deal with,' states Mr. Muchiri. 'I have an agronomist which works with them to guide them in the ways of growing a crop.' Despite having the expertise of a specialist in agriculture to help farmers in the production process, Avenue Fresh is having a hard time to co-ordinate all their activities. Even if he is planning to set up technical teams to provide them with further support, Muchiri has been wondering whether he should continue working with them or find another solution.

Avenue Fresh applied for PIP support in February 2002 and signed a protocol in January 2003. Its primary concern is to have the assistance of PIP in setting up a training programme for its outgrowers so that they may better understand the requirements of their customers and be aware of the safety risks in the different steps

of the food production process. Having outgrowers versed in such topics as traceability and food safety is important for Avenue Fresh as it will facilitate its endeavour to develop a food safety system and perhaps even lead to certification.

Beyond helping his company to build up its capacity, Charles Muchiri considers that the PIP can also play an important role in other respects. *'I feel that it's better to work from a results-oriented approach,'* he says. *'PIP understands EU regulations, they understand what the growers and the consumers need. If we know exactly where we're going then it should be easy to put everything in place.'*

Avenue Fresh wants to continue to export to the EU beyond the critical date of January 2005 when traceability requirements will become mandatory. Mr. Muchiri is confident that working with PIP can be helpful in achieving that goal as long as initiatives are implemented in a timely manner.

The fruit and vegetable sector in Kenya

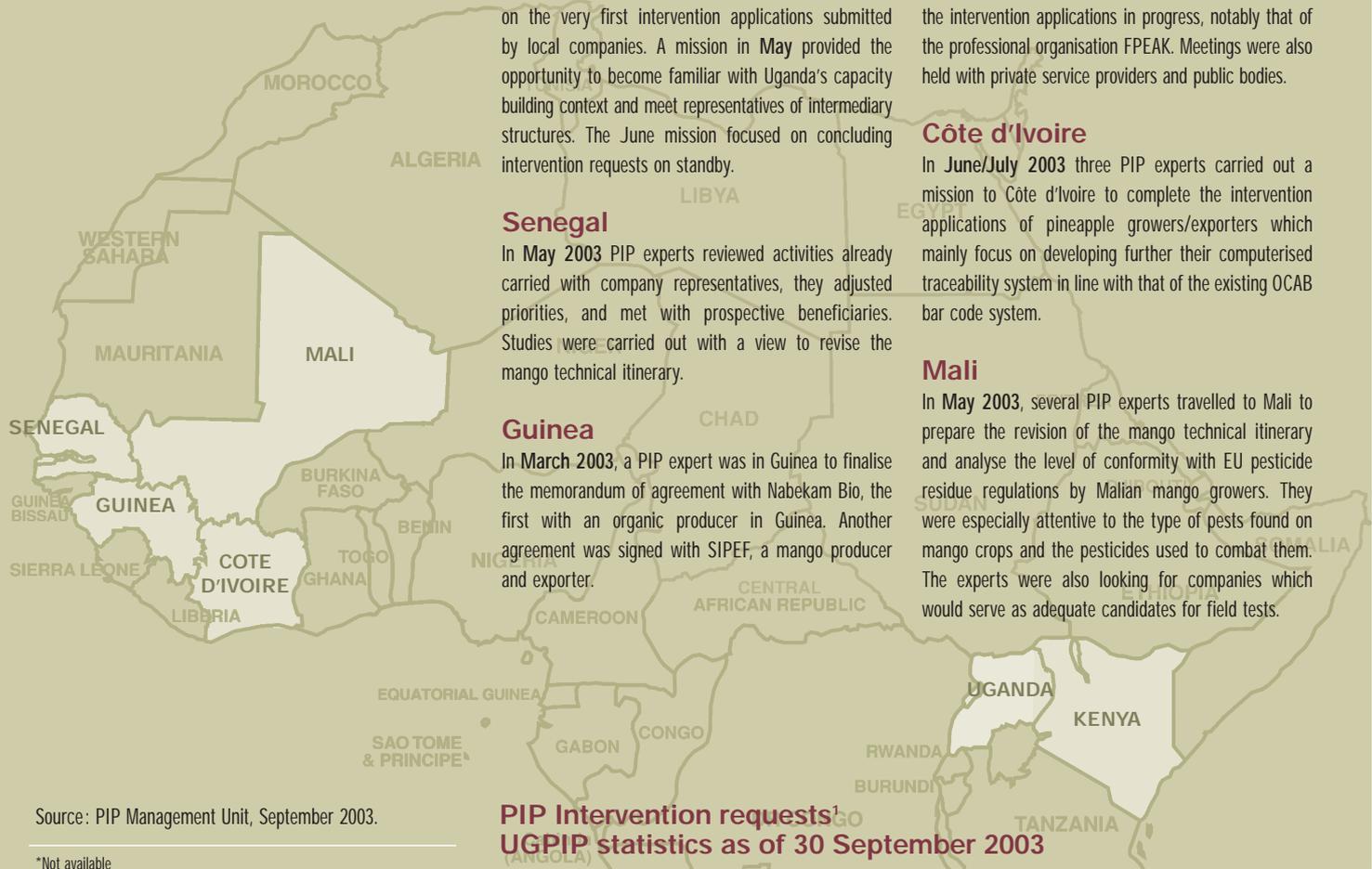
Kenyan exporters and producers exported some 58 000 tonnes of fresh fruits and vegetables to the European Union in 2002. At the top of the list are green beans – one of the most important imported horticultural products to the EU from ACP countries – with 22 000 tonnes, followed by avocados (12 000 tonnes) and mangetouts (4 000 tonnes). The remainder is made up of various fruits and vegetables. Kenya is the second biggest exporter of green beans and the biggest exporter of mangetouts to the European Union. The production of fresh vegetables in Kenya rests mainly in the hands of some 4 000 small producers.

The PIP Programme in Kenya

Since the inception of the PIP some two years ago Kenyan companies have been particularly active in the life of the programme. PIP experts have conducted ten missions to Kenya between November 2001 and June 2003 to present the programme to interested companies and to help producers and exporters put in place traceability and food safety systems. Of the 9 protocols signed with Kenyan organisations – as of August 2003 – seven of them were producers and exporters of fruits and vegetables representing a total of 33 685 tonnes of produce exported per year. The service provider DUDUTECH and the professional organisation FPEAK have also signed co-operation protocols with the PIP.

FPEAK is the professional organisation which represents producers of fruits and vegetables. KEBS, the Kenya Bureau of Standards, is the body responsible for setting quality standards in Kenya and controls their proper implementation.

The Fresh Produce Exporters Association of Kenya
 ► <http://www.fpeak.org/>
 Kenya Bureau of Standards
 ► <http://www.kebs.org/>



Uganda

The first PIP mission to Uganda in **March 2003** focused on the very first intervention applications submitted by local companies. A mission in **May** provided the opportunity to become familiar with Uganda's capacity building context and meet representatives of intermediary structures. The June mission focused on concluding intervention requests on standby.

Senegal

In **May 2003** PIP experts reviewed activities already carried with company representatives, they adjusted priorities, and met with prospective beneficiaries. Studies were carried out with a view to revise the mango technical itinerary.

Guinea

In **March 2003**, a PIP expert was in Guinea to finalise the memorandum of agreement with Nabekam Bio, the first with an organic producer in Guinea. Another agreement was signed with SIPEF, a mango producer and exporter.

Kenya

Several PIP experts were in Kenya in **May 2003** to finalise the intervention applications in progress, notably that of the professional organisation FPEAK. Meetings were also held with private service providers and public bodies.

Côte d'Ivoire

In **June/July 2003** three PIP experts carried out a mission to Côte d'Ivoire to complete the intervention applications of pineapple growers/exporters which mainly focus on developing further their computerised traceability system in line with that of the existing OCAB bar code system.

Mali

In **May 2003**, several PIP experts travelled to Mali to prepare the revision of the mango technical itinerary and analyse the level of conformity with EU pesticide residue regulations by Malian mango growers. They were especially attentive to the type of pests found on mango crops and the pesticides used to combat them. The experts were also looking for companies which would serve as adequate candidates for field tests.

Source: PIP Management Unit, September 2003.

*Not available

1 - Producers, exporters, professional organisations, intermediary structures.

2 - For producers and exporters which have signed a protocol or have applied for PIP support. Professional organisations and intermediary structures are not included.

PIP Intervention requests¹ UGPIP statistics as of 30 September 2003

Country	Signed protocols	Protocols under review	Tonnes exported ²	Number of producers
Kenya	9	7	33 055	3 603
Côte d'Ivoire	7	8	290 140	405
Ghana	5	7	15 230	364
Senegal	5	7	10 900	956
Burkina Faso	4	5	13 380	3 027
Cameroon	2	4	1 600	205
Jamaica	2	3	1 000	1
Guinea	2	1	1 100	380
Uganda	1	12	1 340	448
Tanzania	1	1	1 380	10
Mali	0	3	460	100
Togo	0	1	200	NA
Congo Brazzaville	0	1	NA*	NA
Malawi	0	1	1 700	NA
Total	38	61	371 485	9 499

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