Legislative provisions, SPS issues.

Adapting to international pesticide residue standards

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Delegates towards the end of the day
This presentation

- Responsibility for food safety, nationally and internationally
- How legislation and regulation go hand in hand with trade
- Pesticide issues
- Other potential food safety issues
- Need for change
- Conclusions
Local regulatory and legislative provisions

Created by government
Administered by Competent Authorities

• Protect consumers
• Ensure that food businesses produce food that is safe to eat
• Make sure the private sector respects the regulations
Food safety is a scientific discipline to grow, process, handle and prepare food in ways that prevent foodborne illness or poisoning. This includes a number of management procedures and control systems that prevent potentially severe health hazards from harming consumers.
Division of responsible for food safety within a country

The roles of:

PRIVATE SECTOR

COMPETENT AUTHORITIES
• Private sector - Responsible in law for food safety. Liable to prosecution if consumers are put at risk by food
Requirement at National level

1. Legal framework
2. Political will
3. Resources and facilities (Competent Authorities)
4. Possibility that offenders face sanctions
• Possible food contaminants
How does the national system need to change for cocoa?
What are the hazards and how should risks be better managed in the production and supply of cocoa
Hazards

1. Pesticides
2. Mycotoxins
3. Heavy metals
4. Microbiological contamination
I will concentrate mainly on pesticides
Food safety needs proactive controls that prevent problems occurring.
Food safety - Old ways

Many of the safety issues in food production, processing and trade were left to chance.

Why are spot checks and inspections not an adequate way to control food safety?
Because results from spot checks often come too late – food may be sold or eaten before results from analysis come in. And you can only ever take samples from a small percentage of produce.
Already feeling sick
Food safety systems in west Africa

Effective national food control systems are essential to protect the health and safety of domestic consumers and to assure the safety and quality of their foods entering international trade.
MRLs
PESTICIDE CONTROLS by Competent Authorities

REGISTRATION
LABELS
RESIDUE TESTING (LABS)
INSPECTION
TRAINING AND INFORMATION
PESTICIDE CONTROLS by Competent Authorities

All the controls need to be backed up by sensible legislation

Legislation needs to be backed up by checks and verification
Findings in Ghana 2012 (under EDES programme)
Assessing strengths and weaknesses in pesticide usage

15 recommendations

• Residue violations (Japan) most likely due analytical procedures and to post harvest treatment
• Better access to inputs and advice as COCOBOD influence reduces
• Hygiene around warehouses needed tighter control
• Stop using poisonous dyes - Some sacks being labelled with home-made dye made from batteries
• Observation of farmer practices should be carried out - would highlight any misdeeds
• Do not allow confusing copies of well-known pesticide brands to be registered
Confusion

Copy

Original
Beans attract insects during fermentation
Can cocoa growers and exporters be complacent?

• Definitely not!

• LEGISLATION, REGULATION AND RECOMMENDATIONS NOT BEING RESPECTED

• SOME NEW OFFICIAL CONTROLS NEEDED
Legislation in Ghana is generally quite adequate (pesticides) BUT:

Problems are due to:

1. Japanese MRL values being out of step with most trading partners
2. Farmer practices (pesticides)
3. Inputs not controlled adequately
4. Advice farmers receive not objective
5. No back-checks on residues on farm
Farmers practices (pesticides)

1. Non-recommended product applied
2. Possible treatments with insecticide to repel bees during fermentation
3. Possible bio-accumulation of imidacloriprid in fruits and seed (dosage or timing not correct)
Advice to farmers may be biased (not objective)
RECOMMENDATIONS FOR BENEFICIAL CHANGE

- Implementation of current legislation
- Improved access to information
- Appropriate training
- Sanctions for offenders
Training has to be appropriate
Areas in which legislation should be improved

1. Made illegal for suppliers to advise farmers to use pesticides that are not recommended for cocoa

2. Legislation should oblige Competent Authorities to take samples from farms for analysis and stipulate the number to be analysed per annum
Areas in which legislation should be improved (2)

3. Farmers should be obliged to keep records of any pesticides applied to their crops

4. Pesticide companies should not be able to market ‘lookalike’ versions of a quality brand of insecticide
Anticipating wider potential problems with markets
REPUTATION and defence of market share
Private Voluntary Standards go beyond legislation and regulation
Private voluntary standards

Some PVS for cocoa are FAIRTRADING INTERNATIONAL, RAINFOREST ALLIANCE AND NATURLAND
We can look to PVS to assess likely legislative requirements into the future.

One example is full traceability. Another is an insistence that pesticides are not the only tool used to manage pests (IPM).
This presentation is focussed on pesticides and residues

I already said that stricter controls on pesticide supply and usage may be required
With some achievable changes, pesticide residues do not need to be an issue for cocoa.

There are some other areas that could cause loss of reputation for west African beans.
Other Food Safety issues (grateful thanks to Andy Graffham and Mr Kwasi Gorkeh-Sekyim under EDES programme)

1. Ochratoxin
   If beans re-hydrate above 8% moisture during drying or storage (*Aspergillus ochraceus*)

2. Polycyclic aromatic hydrocarbons (more relevant for artificially dried beans). There is now an MRL for PAH
3. Microbial pathogens
This is more of an issue in processing.

4. Heavy metals
This is mainly cadmium for cocoa. Mining contamination (of the soil) can be responsible. However it seems likely that cadmium contamination within phosphate fertiliser is also a potential cause.
Returning to private standards that are often driven by retail buyers
There are some other issues that will be inherited from PVS and could impinge on regulation and legislation.

1. Traceability (includes record-keeping along the production and supply chain)
2. Stricter environmental stewardship during production of cocoa
3. Ethical/social issues
Likely to become unacceptable for 64 kg to be manhandled
Returning to pesticides. The choice of product is not the only potential source of problems!
Conclusions

1. Compared to fruit and veg, cocoa is a relatively low risk crop, but challenges remain

2. Legislation may need to be strengthened, but the weak link in food safety is often because legislation is not respected

3. Reputation of WA cocoa needs to be defended as other countries could supply the market

4. New issues will emerge, to which legislation will need to adapt

5. National FS control systems will need to demonstrate equivalence of risk
I would like to acknowledge and thank the EDES Programme and the ICCO and the organisers of this meeting for invitation to speak at this meeting.