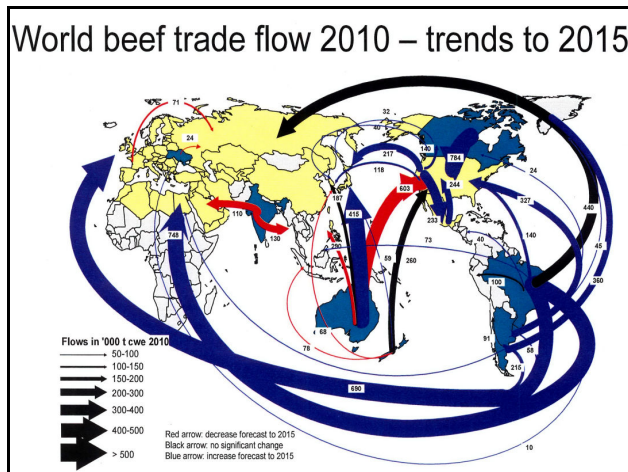




**International trade & residues**

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**Exporting Food to the EU**

- EU – world’s biggest food importer...
- and one of biggest exporters
- Rules for food of plant origin
- Rules for food of animal origin
- Third country requirements
  - Microbiological aspects**
  - Pesticides & contaminants**
  - Residues of veterinary medicines**



**Exports of food of animal origin**

- Positive list of approved countries
- Competent veterinary authority  
*responsible throughout food chain*
- Meet relevant animal health standards  
*implies: OIE member & standards*
- Hygiene & public health requirements  
*Structure & operation of plants*
- Monitoring for residues & contaminants



## Exports of food of animal origin

- Approved establishments only
- BSE status: cattle sheep & goats
- Steps to approval

*Formal application to DG H&C  
Questionnaire  
Residue monitoring plan approved  
FVO inspection to verify  
Country, establishment & commodity*



## COMMISSION DECISION of 16 March 2011

on the approval of plans submitted by third countries in accordance with Article 29 of Council Directive 96/23/EC

Code ISO	Country	Bovine	Ovine/caprine	Porcine	Equine	Poultry	Apes-culves	MRL	Eggs	Rabbit	Wild game	Tanned game	Honey
AD	Andorra	X	X		X								
AE	United Arab Emirates						X	X (*)					
AL	Albania		X				X		X				
AR	Argentina	X	X		X	X	X	X	X	X	X	X	X
AU	Australia	X	X		X		X	X			X	X	X
BA	Bosnia and Herzegovina						X						
BD	Bangladesh						X						

**Lists commodities approved by country  
Approved establishments on www**



## Pesticide residues

- National Maximum Residue Limits (MRLs)
- More than 100,000 MRLs
- Regulation No 395/2005
- "Default MRL" set at **10 µg/kg**
- 3rd countries can use other products to control local pests/ problems
- Facilitates trade



## Environmental Contaminants

- Maximum Limits set for a range of contaminants
- Regulation 1881/2006
- Dioxins, dioxin-like PCBs, PCBs
- Polyaromatic hydrocarbons (PAHs)
- Mycotoxins
- Cadmium, lead, mercury, tin



## Veterinary drug residues

- EU legislation being updated
- Maximum Residue Limit (MRL) legislation **updated**
- Hormone ban legislation **updated**
- Monitoring - more risk-based
- **Proposals expected in 2013**



## Regulation (EC) No 470/2009 of the EP&C

16.6.2009 EN Official Journal of the European Union L 152/11

REGULATION (EC) No 470/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL  
of 6 May 2009

laying down Community procedures for the establishment of residue limits of pharmacologically active substances in foodstuffs of animal origin, repealing Council Regulation (EEC) No 2377/90 and amending Directive 2001/82/EC of the European Parliament and of the Council and Regulation (EC) No 726/2004 of the European Parliament and of the Council

(Text with EEA relevance)

**New CODEX MRLs → EU MRLs**

**Article 14.3.b**  
**if EU accepts the science**



## COMMISSION REGULATION (EU) No 37/2010

of 22 December 2009

on pharmacologically active substances and their classification regarding maximum residue limits in foodstuffs of animal origin

(Text with EEA relevance)

L 13/52 EN Official Journal of the European Union 20.1.2010

Pharmacologically active substance	Marker residue	Animal Species	MRL	Target Tissues	Other Provisions (according to Article 14(7) of Regulation (EC) No 470/2009)	Therapeutic Classification
Oxyclozamide	Oxyclozamide	All ruminants	20 µg/kg 20 µg/kg 500 µg/kg 100 µg/kg 10 µg/kg	Muscle Fat Liver Kidney Milk	NO ENTRY	Antiparasitic agents/Agents against endoparasites
Oxytetracycline	Sum of parent drug and its 4-epimer	All food-producing species	100 µg/kg 300 µg/kg 600 µg/kg 100 µg/kg 200 µg/kg	Muscle Liver Kidney Milk Eggs	For fin fish the muscle MRL relates to 'muscle and skin in natural proportions'. MRLs for fat, liver and kidney do not apply to fin fish.	Anti-infectious agents/Ambiotics

## Maximum Residue Limit (MRL)

- Licensed medicine > MRL
- The food is non-compliant
- Should not be placed on the market
- This applies to domestic product and to imports



## Prohibited substances

Prohibited substances

Pharmacologically active substance	MRL
Aristolochia spp. and preparations thereof	MRL cannot be established
Chloramphenicol	MRL cannot be established
Chloroform	MRL cannot be established
Chlorpromazine	MRL cannot be established
Colchicine	MRL cannot be established
Dapsone	MRL cannot be established
Dimetridazole	MRL cannot be established
Metronidazole	MRL cannot be established
Nitrofurans (including furazolidone)	MRL cannot be established
Ronidazole	MRL cannot be established

Some have Reference Point for Action,  
Others **“Zero Tolerance”**



## Reference Point for Action (RPA)

**Concentration  $\geq$  RPA**  
**or present, if “zero tolerance”**  
**Rejection of consignments or**  
**Product destruction**  
**Protective Measures ?**

**Concentration  $<$  RPA**  
**Follow up required**  
**No rejection/destruction**  
**Protective Measures ?**



## Council Directive 96/22/EC

### Hormones & $\beta$ -agonists

**A nabolic growth promoters**

**Dispute: EU *versus* USA /Canada**

**Banned in EU**

**3<sup>rd</sup> Countries must ban or**

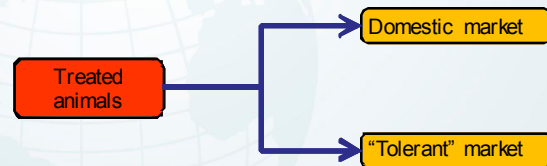
**Have a split system**

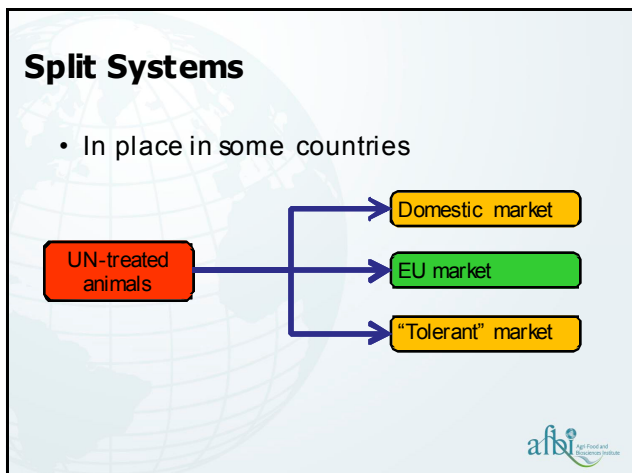
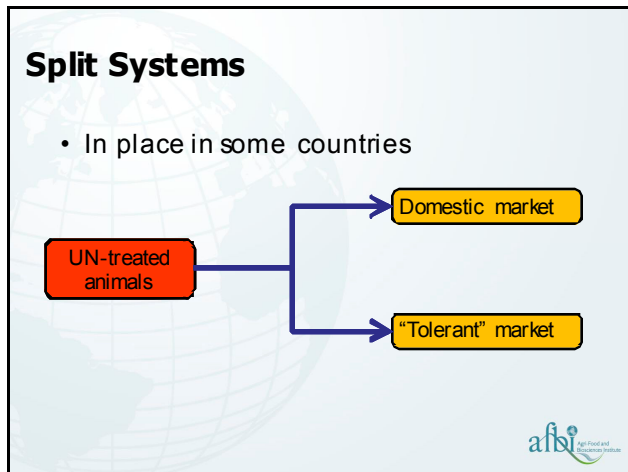
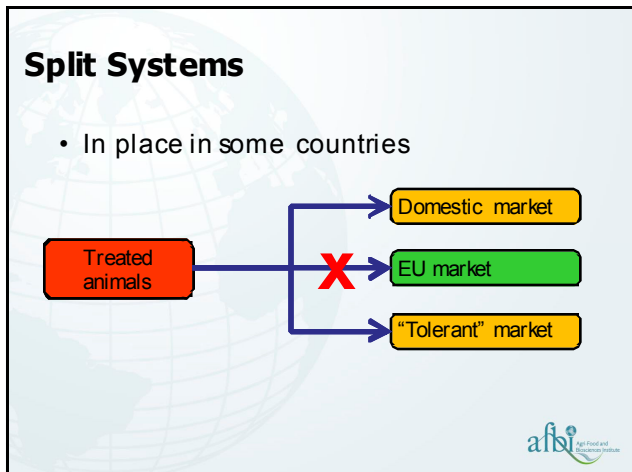
**Ban / split system must work !**



## Split Systems

- In place in some countries





- ### Ractopamine
- $\beta$ -Agonistic growth promoter  
*Pigs, turkeys, cattle*  
*Fed to slaughter*
  - Allowed in many countries (USA, Canada)
  - Banned in others (EU, China)
  - Codex vote: July 2012: **69 : 67**
  - Adopt MRLs in pork & beef
  - EU does not accept safety of ractopamine
- afis** Agri-Food and Fisheries Institute

## Ractopamine - Split Systems

- In place in Canada and Brazil
- Not easy to ensure compliance
- Brazil FVO Inspection (2011)  
Ractopamine-free pork  
System not fully accepted by EU
- Canada RASFF 2012  
Ractopamine-free beef & pork  
Beef system accepted by EU, but  
Ractopamine found in liver in EU



## Ractopamine in Taiwan

- Banned in Taiwan
- Ractopamine in beef & pork from USA



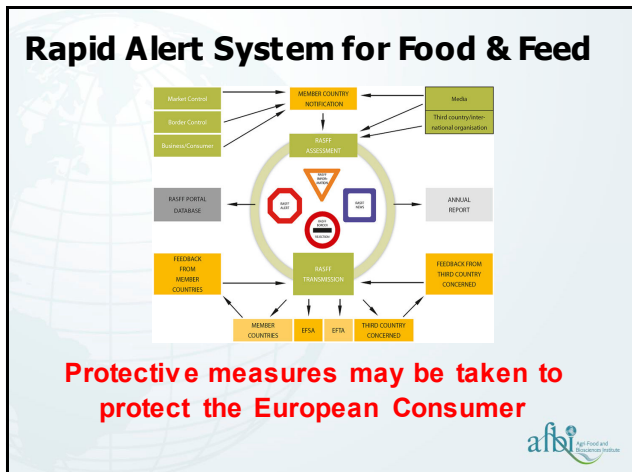
## Parliament blockaded



## Ractopamine in Taiwan

- Banned in Taiwan
- Ractopamine in beef & pork from USA
- USA discussions with Taiwan
- Taiwan to decide this week...





### Special Import conditions

[http://ec.europa.eu/food/animal/bips/special\\_imports\\_en.htm](http://ec.europa.eu/food/animal/bips/special_imports_en.htm)

- Lists conditions placed on 3<sup>rd</sup> countries
- Needed to protect the European consumer
- Document updated when required




- ### Pre-export certification
- Requires 3<sup>rd</sup> country to test consignments
  - Before export to EU for specific residue(s)
  - Certificates **must** accompany consignments
  - EU has some confidence in laboratory system
  - e.g. China (chloramphenicol & nitrofurans)
- 

- ### Import testing at BIP
- May require 3<sup>rd</sup> country testing as well
  - EU has less confidence in laboratory system
  - Fixed % must be tested at BIP
  - % is usually either 20% or 100%
  - Action: **reject or destroy**
  - Indonesian aquaculture products
- 

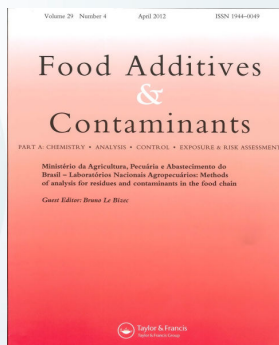
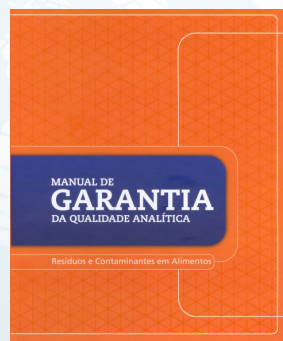
## De-listing

- Most extreme sanction
- De-list *establishment*  
*region*  
*commodity*
- Ultimately: delist entire country
- China: all farmed food of animal origin
- Imposed 2002, lifted 2004



## How to avoid problems ?

- Brazil: residue problems in 2002-2004
- Difficult FVO inspections
- More centralised approach
- Send staff to EU for training
- EU training on-site in Brazil
- Quality manual published
- Analytical methods peer-reviewed



## How to avoid problems ?

- Chile: relatively few problems
- Less centralised approach
- Private sector laboratories
- Industry-led
- Independent audits by lab staff from EU
- APA
- ASPROCER
- Salmon Chile





### How to avoid problems ?

- Follow Chile/Brazil examples
- Bring in EU expertise
- Other possibilities...
- Outsource testing to another country
- Transnational "Centres of Excellence"
- Benchmark, benchmark, benchmark



### Conclusions

- Residues affect international trade
- CODEX not a complete solution
- Help is available to exporting nations
- Locally and internationally

**"Prevention is better than cure"**

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