

MLR FOR PINEAPPLE – ETHEPHON

Statement by Ecuador

Revision

The following communication, received on 5 May 2008, is being circulated at the request of the delegation of Ecuador.

1. Ecuador would like to express its concern at the possible modification of the maximum residue levels (MRLs) for Ethephon in pineapple, in the context of the reforms currently being elaborated by the European Union's Standing Committee on the food chain and animal health with respect to products related to pesticides, contaminants and other substances.
2. Currently, under European Commission Directive 2006/61/EC of July 2006, the MRL set by the European Union for Ethephon is 2 mg., while the acute reference dose (ARfD) is 0.05 mg., in accordance with the recommendations of the Codex Alimentarius and as established at the Joint FAO/WTO meeting on pesticide residues in 2002 respectively.
3. However, during the reassessment of these levels by the European Food Safety Authority (EFSA) in 2006/2007, the ARfD, namely the dose that could cause adverse effects if exceeded in a single ingestion, was reduced to 0.03 mg./kg.
4. This change led the European Union to revise all of its MRLs currently in force for pesticides and other contaminants, with the result that it apparently proposes to reduce the MRL for Ethephon in pineapple from 2 mg./kg. to 0.05 mg./kg., which is the analytical detection limit.
5. We do not feel that there is sufficient scientific justification for the establishment of these new maximum residue levels, since the EFSA's analysis was based on a risk assessment conducted with inappropriate and incomplete information, without sufficient scientific evidence, and without taking account of the recommendation of the international reference organization, in this case the Codex. This is clearly contrary to the WTO Agreement on the Application of Sanitary and Phytosanitary Measures.
6. It is also important to note that other studies conducted by the EFSA for products such as wheat and barley establish levels that are higher than for pineapple. This contradicts the arguments put forward by the European authorities according to which current levels would cause damage to health.
7. Although Ecuador has complied with the levels in force, the fact that the European market requires compliance with standards such as Global GAP means that a forty-fold reduction in the

current limits, from 2 mg. to 0.05 mg., would preclude the use of this input to regulate plant growth, to control the pineapple ripening process, and to maintain the quality attributes demanded by the consumer, and would ultimately mean failure to meet the European market's quality requirements.

8. This would considerably damage our pineapple exports, which are currently worth approximately 20 million dollars and account for 48% of our total exports. Based on current export growth rates, the social impact would be considerable: some 6,000 persons currently working in the sector would lose their jobs, and 5,200 fewer workers would be hired over the next five years.

9. For the above reasons, Ecuador considers that the MRL values proposed under the new EU revision could result in a considerable restriction of access to the European pineapple market. Consequently Ecuador calls upon the European Communities to consider maintaining the MRL for Ethephon in pineapple at 2 ppm, namely the level adopted both by the Codex and several developed countries following scientifically based studies which show that these levels are toxicologically acceptable, and that there is no scientific evidence of any damage to human health.

10. Finally, Ecuador would be happy to discuss this subject with the European Communities in order to find a satisfactory solution to its trade concern.
