

STATEMENT ON THE PESTICIDE RESIDUES COMMITTEE (PRC) THIRD QUARTER 2000 SURVAILLANCE RESULTS

The Agency notes the publication by PSD of the pesticide surveillance results for the 3rd quarter of 2000. For full details of the results see the PSD website at <http://www.pesticides.gov.uk/committees/PRC/prc.htm>. The issues are as follows:

- We are pleased that the Pesticide Residues Committee is now reporting results more frequently because we believe that consumers should be informed as quickly as possible;
- Many of the results provide reassurance about low levels of pesticide residues in food;
- Even where pesticide residues exceeded legal limits (MRLs) they did not present a food safety concern;
- The results for winter lettuce reveal a continuing problem. We are particularly concerned that enforcement campaigns do not appear to have had any effect on the proportion of UK grown winter lettuce exceeding pesticide legal limits (MRLs). Although the levels found do not have safety implications, the FSA considers the situation to be unacceptable and is calling for action to sort it out.

Animal Products, Fish and Shellfish

We are pleased to see that no residues were found in several of the animal products tested (milk, bacon and cream) and that the residues found in shellfish show an improved situation. Difficulties encountered with analysis for some residues in bacon and beef meant that there were no results for some analytes. These will be followed up, but the results that were obtained were encouraging. Results for oily fish (e.g. herring, mackerel, pilchards and sardines) showed an increased incidence of residues compared to previous work but were generally at very low levels, except for one sample with DDT at 0.2mg/kg. This does not represent a health risk.

Pears, Sweet Peppers, Nuts, Cucumbers and Plums

The results from the pears survey provide a reassuring picture. All of the residues of chlormequat detected were well-within the EC MRL of 3 mg/kg and only one sample of UK origin contained a very low level which indicates contamination from a previous season's use, rather than mis-use is more likely. The retailer has been notified of this result. Similarly we were pleased with the improvement seen in the sweet peppers follow up work, with no residues found. We were pleased with the improvements seen in nuts, and in cucumbers. The results for plums were acceptable but were not comparable with previous surveys.

Winter Lettuce

We agree with PSD that for lettuces, apart from the improvement seen for methyl bromide, results for other analytes are not acceptable and that further action is needed. There was again a demonstration of a non-approved use in the current set of results for dimethoate. We are particularly concerned that enforcement campaigns do not appear to have had any impact on the proportion of UK grown winter lettuce exceeding pesticide MRLs. Although the levels found do not have safety implications for the consumer, the FSA considers this situation to be unacceptable. We welcome the PSD initiative to review the way enforcement samples are taken as a first step to developing a strategy to stamp out this misuse.

The major problems relate to grown lettuces that are grown under protection in the UK. UK lettuces are mainly the round type and compared with the iceberg types, where several of the outer leaves are trimmed off prior to market, have a greater propensity to intercept and retain pesticide residues due to the open leafy habit of the plants. During the winter months, sunshine in the UK is often poor and the growing temperature is much reduced. Under these conditions lettuce crops are slower to mature and tend to be more prone to disease. The frequency of pesticide applications needed to maintain control is therefore increased, yet these conditions are also likely to extend the persistence of any applied pesticides.

Lettuces have been included in the rolling retail programme since 1988 and several enforcement surveys have been carried out since 1994. We present below a time trend analysis for lettuce (retail and enforcement samples) which sets out the percentages of the total samples analysed in any given year that were found to contain residues; the percentages of the total samples analysed in any given year that were found to contain multiple residues; the percentages of the total samples analysed in any given year that were found to contain residues exceeding MRLs; and the percentages of the total samples analysed in any given year that were found to contain non-approved pesticides. The majority of samples are of winter lettuce that is assumed to have been grown under protection. The variety of lettuce is not distinguished.

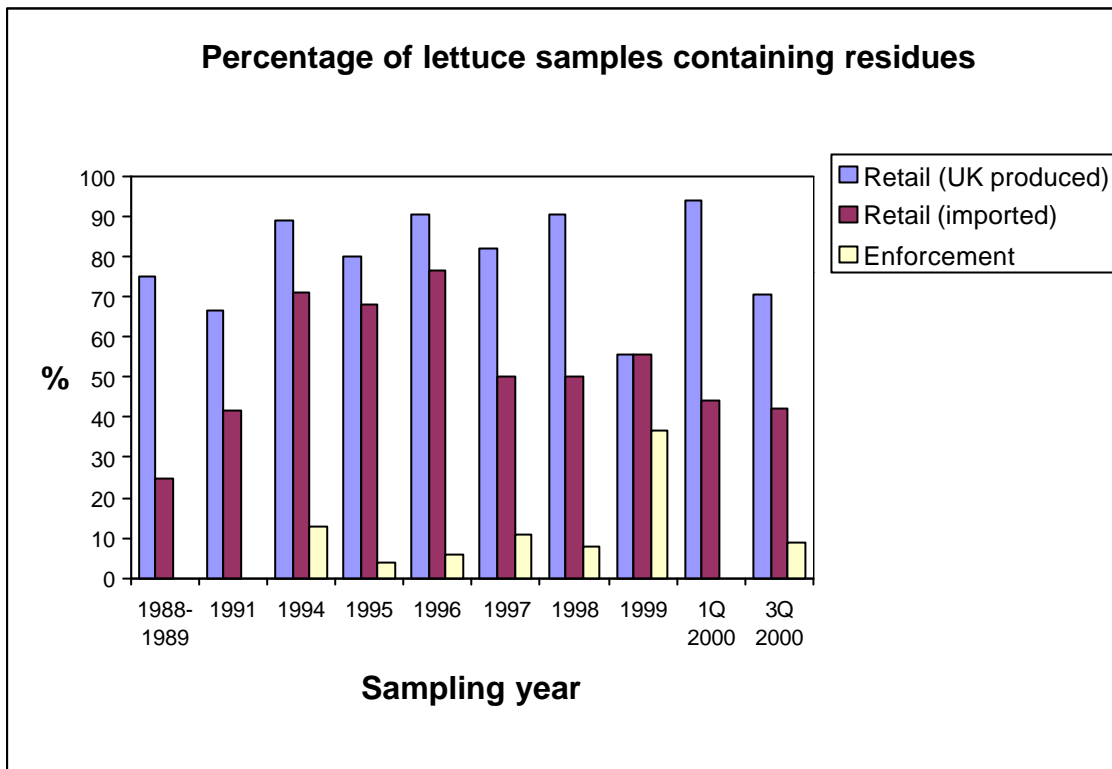
Note that the retail data (UK produced) and the retail data (imported) that have been considered in the time trend analysis relate to data generated from the routine surveillance carried out as part of the WPPR/PRC fruit and vegetable rolling programme. Miscellaneous surveys (1989-90, 1992, 1993, 1996) and an EU survey (1996) are not included. The number of pesticides sought in the retail surveys range

from 9 (1995, 1996) to over 100 (1994, 1998, 2000). The number of samples analysed range from 22 (1997) to 107 (1991). The pesticides sought vary from year to year and include both approved and non-approved pesticides. The enforcement data are from enforcement surveys that have been carried out as a result of the ongoing problems with MRL exceedances and misuse of certain pesticides by some UK lettuce growers that has been found by the retail surveillance. Enforcement samples were taken directly from premises of UK lettuce growers by MAFF (now DEFRA) field officers. Sample sizes are generally smaller with a small suite of 'targeted' pesticides sought. Also note that detection limits for some pesticides may vary from year to year (for example as technology improves detection limits also improve). The results presented here relate to the detection limits that were in place when the surveys were carried out – there is no standardisation to account for any changes in these limits. Thus, an apparent increase in the number of samples containing residues may not actually be due to increasing pesticide levels, but rather due to improved detection limits.

It is clear from this analysis that despite the many years of surveillance there is no clear trend of improvement. There are consistently lower levels of residues in imported lettuce in comparison to UK grown. Successful prosecutions of individual growers have resulted from the enforcement programme but there continues to be illegal use and exceedances of MRLs. There appears to be a discrepancy between the results of the retail and enforcement surveys, with generally lower levels being detected in the enforcement work. The reasons for this are not clear and, as discussed above, we welcome PSD's initiative to review the arrangements for enforcement and see it as the first step in developing a strategy to curtail this evident misuse.

Time trends for lettuce:

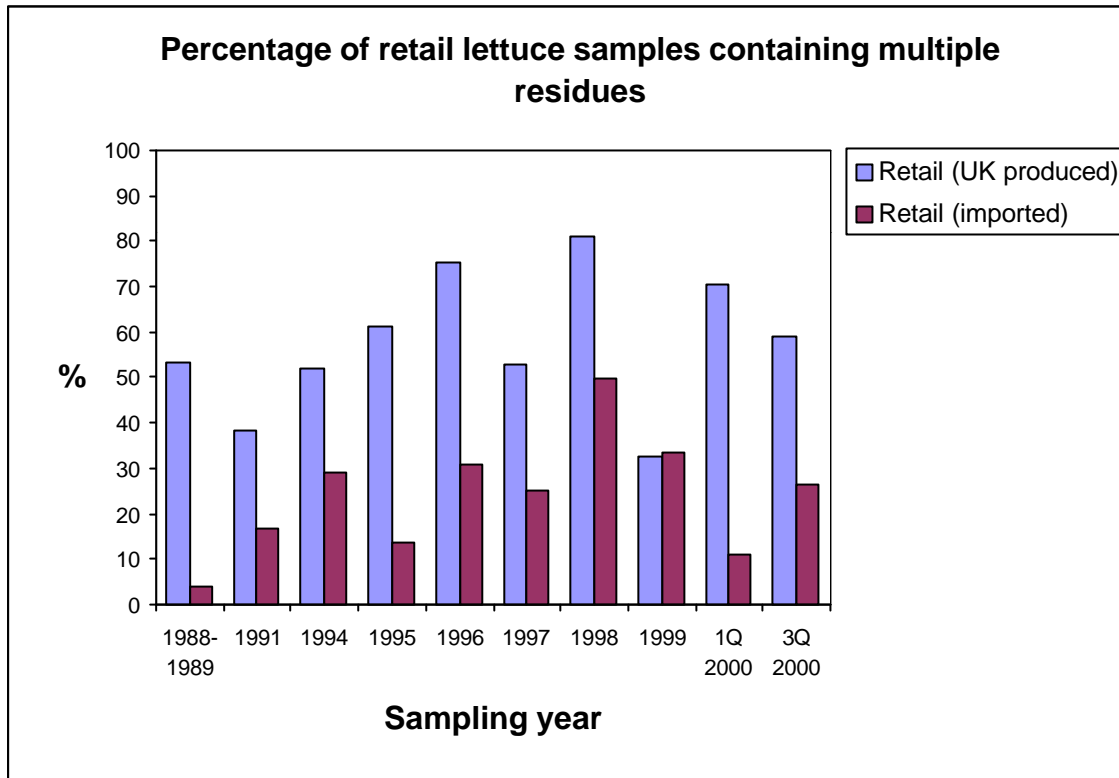
Graph 1



Notes:

- No enforcement surveys carried out before 1994 or in the 1Q 2000.

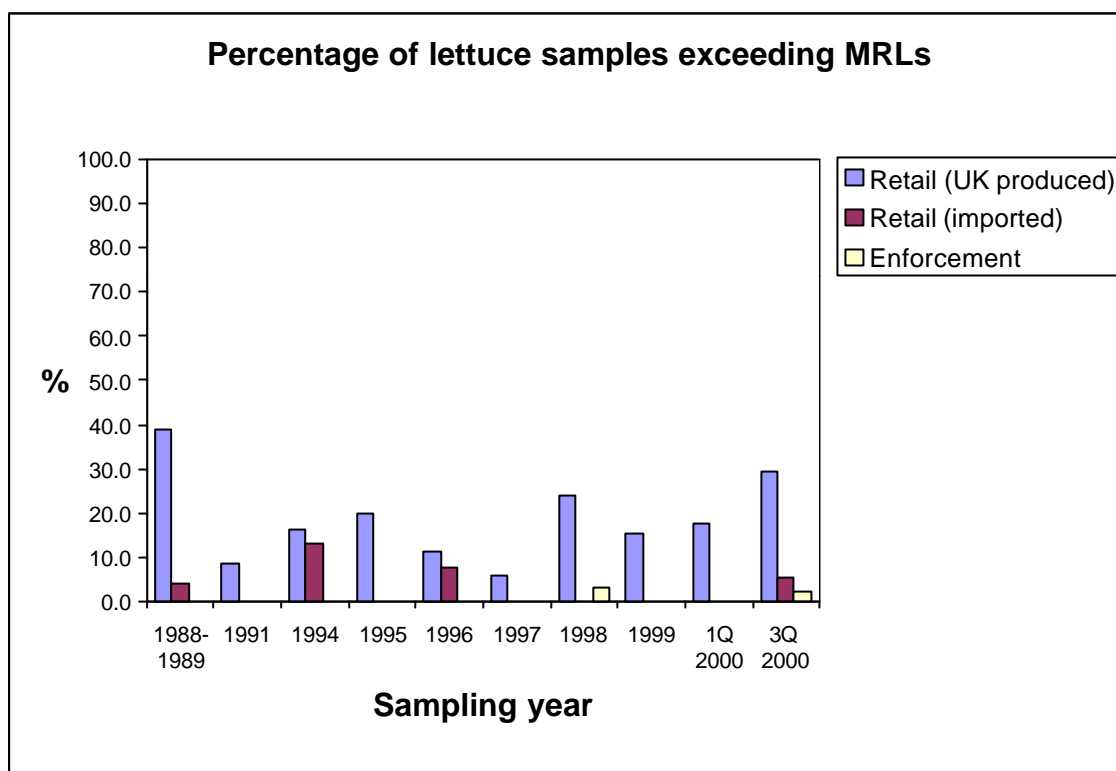
Graph 2



Notes:

- 'Multiple residues' refer to the presence of more than one residue.
- 1% of UK growers' samples in the 1997 enforcement survey contained multiple residues. No other multiple residues were found in the enforcement surveys.

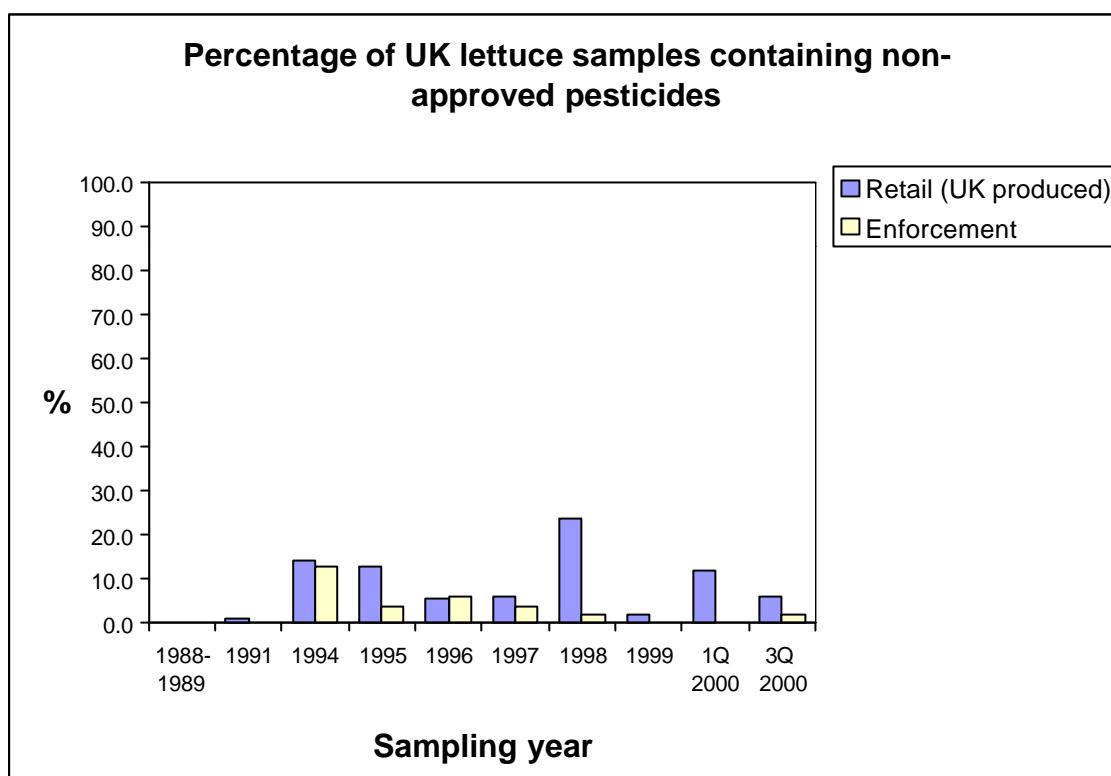
Graph 3



Notes:

- No enforcement surveys before 1994 and in the 1Q 2000.
- Some samples may contain multiple MRL exceedances.
- No MRL exceedances in the retail (imported) surveys 1991, 1995, 1997, 1998, 1999 and 1Q 2000.
- No MRL exceedances in the enforcement surveys 1994-97 and 1999.

Graph 4



Notes:

- No enforcement surveys before 1994 and in the 1Q 2000.
- Some samples may contain multiple non-approved pesticides.
- No non-approved pesticide residues detected above the reporting limits in the 1999 enforcement survey.

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