was modified by directives of December 1996 and then of 15 October 1998. The 1996 changes were made to the French order of 1991 by that of 2 October 1997 (*Journal Officiel* of 8 November 1997). The wording of the amendment is not very clear with regard to the substances mentioned on banana. We propose to review post-harvest treatments shortly.

Laurent de Meillac, banana grower in Martinique, chairman of SICABAM-Martinique

Outside the European Union, any product can be used on fruits before and after the harvest on condition that there are no residues. The fruits treated in this way cannot be barred for import. However, the use of these products is forbidden in the European Union. Does not this imply an enormous distorsion of competition between European Union producers and the others?

Gilbert Theissen

This is a problem of national sovereignty and not of unfair competition. Every third country has its own registration system (or is trying to set one up according to its resources). Countries make a political choice with regard to authorised pesticides. This choice will be more or less in line with sustainable agriculture that respects consumers and the environment.

The European Union and France have taken this line. Following the last agricultural framework law in 1999, our farmers will be taken to court if they use (or even just possess) treatment products that are not registered for the crops that they grow. This is a penal offence and is punished by up to six months of imprisonment and a fine of up to FrF200 000. Controls of residues form part of this political approach.

Ellen Hanak Freud, CIRAD-CA

Are we moving towards the harmonisation of standards among European Union member-countries?

Gilbert Theissen

Yes, this is the objective of Directive 90/642, amended, of 1990. Thus, the MRL for fenamiphos (the active substance in Nemacur) is 0.1 mg/kg in Germany and 0,02 in the United Kingdom on banana and France and the Codex have not set an MRL. The minimum detection threshold is therefore applied in France. Hence, if you have applied Nemacur in your plantation it is better to send your bananas to Germany where they have more chance of getting through. The aberration is that these bananas can subsequently enter France with, perhaps, less risk of being stopped. This is a harmonisation problem that exporters are currently profiting from. I have already replied to Mr de Lapeyre on the subject of bitertanol. The level of thiabendazole on banana is to rise from 3 to 5 mg/kg whereas ethephon on pineapple is to be lowered from 2 to 0.5 mg/kg. That is harmonisation.

A product whose MRL is in conformity with European standards may move freely in the community even if the active substance is not present in a product registered for crop treatment in a member-country. In fact, registration and MRL are totally unrelated. The MRL of unregistered substances is also set at the detection threshold ■

The impact of pesticide regulations on ACP fruit and vegetable trade channels

Catherine Guichard, Delegate-General of COLEACP

Few companies concern themselves with the regulations on pesticide residues as long as they are not hit by sanctions. Consumer concern generated by successive foodstuff problems at the end of the 1990s led to reaction by the sanitary authorities. This awareness was particularly marked in Great Britain; there was no longer any question of the government being an accessory in sanitary problems, after failing to condemn those whose errors were detected during controls.

The first list of offenders was made public in 1999 and contained the names of the supermarkets where tests had revealed residue levels higher than the limits set. The names of the importers supplying the supermarkets were also mentioned. As there is strong competition between British retail distributors, the latter reacted to prevent these 'naming and shaming' campaigns from results in severe losses of market shares.

This led to extremely strict conditions applied by distributors to their suppliers, who must provide guarantees concerning operational sequences, the full traceability of goods and the assurance that the pesticide residue limits laid down by the regulations are respected after the application of good farming practice. The problem of pesticide regulations appeared to be very serious in 1999, because it seemed that 'open positions' would be reduced to analytical 'zero' on 1 July 2000, and some people went as far as thinking that the maximum residue limit (MRL) of all pesticides used on horticultural crops and for which an MRL had not been harmonised at a European scale would have an MRL of zero.

With the strengthening of controls and European concertation since 1995, each member-state must report the results of its residue tests to the European

Commission. This in turn monitors the excesses recorded in the different member-states in order to know whether the regulations are suited to the real conditions in subsectors. The aim is not to set very low MRLs but rather to reflect the residue level attained when good farming practices are used.

Controls were intensified when the risks of exceeding MRLs increased, especially when they are set at 'zero'. The consequences are serious for companies, which risk a FrF250 000 fine, a prison sentence of up to 6 months and an entry in the criminal record of the importer found to be responsible for the offence. The industry was worried about what to do: 'We are responsible enterprises and wish to assume our responsibilities, but what do they consist of?'.

Shortage of information

During the past year, COLEACP has sought the existence of a database on national MRLs and harmonised MRLs in the EU that is user-friendly, complete and accessible to as many people as possible, and especially foreign suppliers. None was found. Nevertheless, the MRL organisation process is very slow and national MRLs will probably remain in force simultaneously with the European MRLs that will gradually replace them over a period of about ten years.

It should be noted that professionals should pay great attention to regulation dates in order to avoid being sanctioned. There are three dates: that of the European directive, the deadline for its transcription into national law and the date of its application to the entire EU. The latter date interests companies. For example, the European directive of 22 June 2000 lays down thiabendazole MRLs of 5, 10 and 15 for mango, avocado and papaya respectively, but the measure must be transcribed into national law on 28 February 2001 at the latest and will not be applicable until 1 July 2001.

The impact on the industry is related essentially to the absence of complete, overall, clear information concerning present and future MRLs. Production and export companies will have to adapt to give the guarantees required by their clients, implying the redesigning of their organisation and chain of responsibility. Aid will probably be necessary for the most vulnerable groups which do not possess the human, technical and financial resources for rapid adaptation.

COLEACP performed a survey in its professional network in the pineapple subsector in summer 1999 in order to list the pesticides used. In fact, 45 uses of pesticides were listed, with 17 insecticides, 8 fungicides, 9 nematicides and 7 herbicides, together with ethephon of course. This enabled us to defend, in priority, post-harvest fungicides necessary for sea transport and ethephon. It was feared at that time that the MRL for ethephon on pineapple might be the detection threshold. However, scientific results made it possible to set it at 0.5 ppm, a European harmonised level that will come into force on 1 July 2001. Nevertheless, this is a quarter of the current French 2 ppm MRL.

Questioned about their possibilities of adaptation to regulation changes in MRLs, production companies replied that they would change their pesticide use parameters and train their personnel. In the short term, many wished to perform residue tests on their produce on its arrival in Europe, as there is a lack of laboratories equipped to perform residue tests at departure in tropical countries.

In the medium term, everybody recognises that a voluntary process of adopting good farming practices is necessary—corresponding to the rational agriculture concept. However, companies need help in this process. Full traceability has already been set in a number of chains and trials must be redeployed to reset crop management sequences in accordance with MRL obligations.

The problem of economic profitability will obviously arise for companies insofar as their efforts to master pesticide residues risk increasing production and management costs at a time when competition on markets is reducing margins. There is a very great risk of stopping business with small growers, which are very vulnerable groups.

ACP Pesticides Initiative Programme

In response to the preoccupations of professionals in the ACP and European countries discussed at numerous meetings, COLEACP approached the Development Directorate-General in September 1999 on the subject of pesticide residues. In November 1999, it was given the task of analysing the situation in the ACP/EU horticultural industry and suggesting solutions. The feasibility study of the ACP Pesticides Initiative is in progress and should be completed at the end of September 2000. This will theoretically be a 5-year programme and should provide support for subsectors by responding to demand from operators in a bottom-up process starting with ACP operators and their professional organisations.

The aim of this programme is the improvement of the sanitary quality of ACP supplies for both export and local markets. The idea is to find sustainable solutions by identifying the areas to enhance so that

the changes in regulations can be handled after the 5-year programme.

The Pesticides Initiative programme has four components:

1) Information-communication, so that everybody knows the pesticide regulations applied to each type of crop.
2) Regulations: experiments should make it possible to set reasonable MRLs that reflect good farming practices, especially for the minor crops in which the MRLs are set at the detection threshold.
3) Good practices / sanitary quality approach.
4) Strengthening of ACP capability.

Under the aegis of the Directorate-General for Health and Consumer Protection (DG SANCO), the rapporteur member-states working on the setting of harmonised MRLs have agreed to form voluntarily a small group of experts on tropical crops. We have already held a meeting at the end of June to examine the possibility of reducing the information requirements for setting MRLs for minor tropical crops. Various extremely promising lines are envisaged, in particular using extrapolations between tropical fruits of similar size with inedible skins for post-harvest fungicide treatments with identical practices. The possibility of setting an MRL after one year for pre-harvest uses could be considered if the experiments performed at three similar locations using the same farming practices lead to identical results after the first year.

These discussions are in progress and require permanent dialogue for the taking into account of the requirements of tropical channels.

In conclusion, at a time when the subsectors sometimes consider that the changes in MRL regulations are a catastrophe, the Pesticides Initiative programme shortly to be launched by the European Commission will provide maximum support for informing and adjusting the practices of companies and for the conducting of experiments to set reasonable tolerances for pesticide residues. The scale of resources available will be strengthened by bilateral and multilateral contributions whose co-operation will be sought actively.

ACP enterprises must adjust to the changes in regulations in order to conserve their existing and future competitiveness. Research institutions have a very important supporting role through the development of technical solutions backed by systems that take their socioeconomic reality into account ■

The segmentation policy in the banana market

François Dalle, Pomona (R&D and Quality Manager), f.dalle@pomona.fr

Pomona is a family-owned company with sales totalling 11 thousand million francs. Six thousand persons work for Pomona in France, divided between two main activities:

- distribution: fruit and vegetables, frozen foods and groceries. All this distribution is in the catering industry and a little in supermarkets and hypermarkets. This was not the case a few years ago;
- upstream activities: these are mainly reserved for supermarkets and hypermarkets, thus all French retail chains. Our skill consists of finding products—sourcing—and processing them when necessary (ripening, for example) and taking marketing and quality into account. We prepare 'ready-to-eat' fruits and vegetables and have also been a large operator in fish processing (mainly wholesale fish trading) for the past 7 or 8 years and still conserve certain French shipping and export operations.

  We also provide services, as our large clients have integrated purchasing operations and entrust us with the logistic aspect.

In the banana subsector, we import some 150 000 tonnes of green bananas, especially from the West Indies, and ripen practically 140 000 tonnes. All our ripening facilities are certified and approximately 60% of the bananas ripened are West Indian.