

The Indian EXPRESS

DAILY FROM: AHMEDABAD, CHANDIGARH, DELHI, JAIPUR, KOLKATA, LUCKNOW, MUMBAI, NAGPUR, PUNE, VADODARA

JOURNALISM OF COURAGE

How MRLs have become a tool to block our farm produce exports

India has no system to monitor pesticide residues in imported foods, even as its own shipments are getting detained in overseas ports.



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In 2017-18, India's exports and imports of agricultural produce were valued at \$ 38.74 billion and \$ 24.89 billion, respectively. In 2013-14, the exports were higher (\$ 43.25 billion) and imports lower (\$ 15.53 billion). In the process, our agri trade surplus has narrowed from \$ 27.72 billion to \$ 13.85 billion.

The above deterioration can be partly attributed to the crash in global commodity prices - following a decade - long boom from around 2004 - that has hit Indian exports hard, even while making imports cheaper. But a less appreciated fact has been the rise in non-price, non-tariff barriers: the countries importing Indian farm produce are subjecting them particularly to rigorous analysis for pesticide residues, often at less than parts per million (ppm) levels.

In August 2014, the European Union (EU) imposed "specific conditions" on the import of okra and curry leaves from India, requiring every



Indian ports lack facilities to detect pesticide residues and other contaminants. *Archive*

consignment to be accompanied by a certificate stating that the produce had been sampled and analysed for the presence of individual pesticide residues within their stipulated maximum residue level (MRL) limits. All consignments were to also be subjected to identity and physical checks at the designated ports of entry, at 20 per cent frequency, to confirm the results of the residue analysis, based on GC/MS (gas chromatography/ mass spectrometry) techniques.

From January 2018, the EU has further disallowed the import of any rice having levels of tricyclazole, a common fungicide, beyond 0.01 ppm. The earlier MRL — the so-called tolerance level of the chemical

in the said food — was 1 ppm or 1 mg/kg, which has now become 1 mg/100 kg. The EU has, moreover, raised the frequency of Indian shrimp consignments inspected for antibiotic residues from 10 per cent to 50 per cent, costing our exporters both extra money and time in clearing their container. And it's not just EU: even Saudi Arabia has cited unacceptable pesticide levels (beyond its MRLs) to deny entry of green chillies and, more recently, cardamom shipments from India.

The point that is significant isn't whether such checks for the presence of contaminants — pesticides, antibiotics, aflatoxins or heavy metals — at the specified residue levels have scientific basis (why

should the EU fix the MRLs for tricyclazole in rice at 0.01 ppm, when it is 3 ppm in the US and Japan?). What's more important is that India has no comparable systems for checking pesticide residues in agricultural produce being imported by it. Our ports today have facilities only for plant quarantine inspection — to certify that imported produce or seeds don't carry insect pests, diseases and weeds detrimental to our agriculture. But none of the importing ports have state-of-the-art GC/MS facilities under the Food Safety and Standards Authority of India or FSSAI to analyse pesticides and other contaminants at 1 ppm and lower (GC/MS is an instrumental method by which complex mixtures of chemicals can be separated, identified and quantified, rendering it ideal for the analysis of even low molecular weight compounds found in foods).

The implications aren't small. India annually uses about 60,000 tonnes of pesticides in terms of active ingredients (technical material). This is not only a fraction of what China, the US or many European and Latin American countries consume (see Table below), but also below the 100,000-odd tonnes for a single state in the US: California. In 2017-18 alone, India imported \$ 668.22

TOP 15 COUNTRIES IN PESTICIDE USE (2014)

(Tonnes of active ingredients)

China	18,07,000
US	5,36,146
Brazil	3,52,336
Argentina	2,07,706
Mexico	98,814
Ukraine	78,201
Canada	76,314
France	75,339
Colombia	73,744
Spain	61,067
India	60,280
Italy	58,825
Japan	53,544
Malaysia	49,199
Germany	45,836
WORLD	35,28,985

Source: FAOSTAT, USEPA

million worth of Californian almonds and \$ 107.18 million of Washington apples. Yet, not one of these imported consignments was tested by FSSAI for pesticide residue analysis.

The same goes for the huge quantities of olive oil, wines, cheese, chocolates and other food products imported from the EU or kiwifruit from New Zealand, dates from United Arab Emirates and Saudi Arabia, grapes from China, or dragon fruits from Vietnam. India, till date, has no record of detaining/rejecting any imported agricultural commodity cargo on account of unacceptable pesticide MRLs under the World Trade Organisation's SPS (sanitary and phytosanitary measures) Agreement to protect human, animal and plant life/health. The reason is simply because FSSAI has neither the necessary systems nor trained manpower to analyse pesticide residues (at ppm levels) in imported foods upon their arrival at our ports.

It is necessary to note here that the number of registered pesticide molecules in India is hardly about 280, as against more than 500 in the EU and nearly 1,000 in the US. Even a country like Thailand uses more than 300 pesticides. It is obvious, then, that the farm produce from these origins would contain residues of pesticides, including those whose use isn't even permitted in India. While we bend over backwards to comply with our importing countries' pesticide MRLs, we don't make those very countries meet our standards for even molecules registered in India, leave alone chemicals whose use is unapproved.

All this has to change. The FSSAI should be made to have the infrastructure and manpower to test all imported food consignments for pesticide MRLs at every port of entry. Simultaneously, a proper coordination mechanism must be put

in place among the FSSAI, Plant Quarantine and Customs department officials.

These steps, apart from ensuring that India does not become a dumping ground for imported foods, will help neutralise so-called green NGOs, who blow up pesticide residue issues in the media to tarnish the image of Indian agriculture globally. This, when pesticide levels in our food produce — based on yearly analysis of samples of foodgrains, vegetables, fruits, milk, spices, tea, meat, egg, etc. collected from farms, wholesale markets and retail outlets across the country under the All-India Network Project on Pesticide Residues (AINPPR) — have been found to be beyond stipulated MRLs in just over 2 per cent of cases (see Table below).

PRESENCE OF PESTICIDE RESIDUES IN FOOD

	Samples Analysed	Samples above MRLs
2008-09	13,348	183 (1.37%)
2009-10	14,225	147 (1.03%)
2010-11	15,321	154 (1.01%)
2011-12	16,948	270 (1.59%)
2012-13	16,494	383 (2.32%)
2013-14	16,790	435 (2.59%)
2014-15	20,618	542 (2.63%)
2015-16	22,103	522 (2.36%)
2016-17	22,271	473 (2.12%)

Source : AINPPR

The time has come to call the bluff of all those wanting to deny a level-playing field for Indian farmers and exporters. We cannot allow pesticide MRLs to be used as a non-tariff barrier by other countries to restrict our agricultural exports, even while allowing free entry to the produce of their farmers. Once we demonstrate our scientific capability in this regard, the importing countries would be careful in applying arbitrary restrictions like they are doing today.