BNN-Guideline Value for Pesticides

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History of BNN-Guideline Value

• Before 2001 there was no guidance „how to deal with pesticide detections in organic products“ (EU Organic Regulation is process orientated and therefore sets no organic pesticide/contaminant limits)
• BNN general assembly established BNN-Guideline Values for Pesticides in 2001
• Practical means to distinguish between pesticide findings resulting from unpredictable, unavoidable circumstances and application of non-permitted substances or technically avoidable contamination
• BNN-Guideline Value is not only a value but a concepts, therefore the name was changed in 2011
BNN-Orientation Value for pesticides - A guideline to evaluate pesticide residues in organic products

Single Residue
BNN-Guideline-Value for each substance is 0.010 mg/kg (expanded measurement uncertainty: 50%).

Multiple Residues
Exceeding of a total of two pesticide agents is not allowed (levels ≥ 0.01 mg/kg, expanded uncertainty not considered)

• Exception for substances allowed in EU Organic Regulation (834/2007; 889/2008)
BNN-Guideline Value: processed products

• In case of **processed products** which are diluted or concentrated (e.g. by drying or extraction) during processing, the residue level has to be calculated back to the fresh product

• **BUT:** In case of indications of post-harvest contaminations, contaminations related to storage protection agents, the residue levels must not be calculated back to the fresh product.
BNN-Guideline-Value/BNN Approach

• BNN- Guideline-Value is not a limit and therefore should not be interpreted as an „organic MRL“, critical level etc.

• first „doubt“ according to Art. 91(2) of Reg. 889/2008, it has to be checked whether the provisions of Organic Agriculture are met

• Exceeding the BNN-Guideline-Value does not „prove“ conventional origin and residue-free is not the same as organic

BNN-Approach: Individual evaluation of each case is necessary! (cultivation, transport, storage, packaging, trade)
Public Statements

• General rule: individual evaluation

• But in the case of environmental contamination, organic products can be affected by unavoidable levels of pesticides, which can affect a variety of producers, processors and traders

BNN has introduced the possibility to issue Public Statements Concerning the Use of the BNN Guideline Value for Pesticides (www.n-bnn.de -> BNN-documents)
Sampling

Sampling method depends on the aim of sampling/question

Formal/representative sampling
- Compliance with legal requirements (MRLs)
- Importers

Informal sampling
- Consumer’s perspective
- Risk orientated
- In general more suitable for check of compliance with EU organic regulation (drift? Seperation? Conmingling?)
Situation in Germany

• Authorities, CBs and operators generally work according to BNN Orientation Value/IFOAM Pesticide Guideline

• Common understanding that
  ❖ a legal action or critical/desertification level is not desirable (and there is no legal basis to introduce any pesticide levels)
  ❖ The introduction of any pesticide level on a legal basis will be a step from process towards product certification which is not in accordance with the principles of Organic Agriculture
Thank you for your attention!

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