

To European import authorities

European Union, DG for Health
and Consumers
LASER, Ms Blaauw
BLE, Mr Budde
DEFRA, Mr. Fransella
BLW, Ms Gschwendtner
Ministère de l'alimentation, de
l'agriculture et de la pêche, Ms
Cognard

21 May 2010

Statement about residues of Endosulfan detected in organic soy beans from Brazil in 2010

Dear Sir/Madam,

We are contacting you regarding residues of Endosulfan detected in organic soy beans from Brazil in 2010. Several samples of organic soy were analysed as every year. The Endosulfan residues detected were considerably higher, compared to former years, exceeding organic guidance values, as for example the BNN (German Organic Processors and Traders Association) orientation value of 0.01 mg/kg.

To our knowledge Endosulfan is applied widely in Brazil by conventional farmers and thus there has always been a high risk of contamination by drift for the organic soybean production. Although this year residues are unexpected high, we have serious concern to believe that the residues are not caused by direct application of the insecticide, but by cross-contamination. According to the information received, there has been heavy rainfall in Brazil October 2009 to March 2010, which resulted in a high insect pressure. In order to deal with this situation, conventional farmers in the areas concerned used high quantities of Endosulfan. (See also additional information in the report from Lach & Bruns¹ annexed).

Our investigations on this issue came to the same conclusion: the contamination of organic products was unavoidable due to environmental conditions and the consequent high conventional use of Endosulfan mentioned. Cross-contamination via groundwater and rain, even on middle and long distances has affected also organic fields, although usual drift prevention measures were met. Furthermore, if Endosulfan contamination would be from direct application, the residues would be substantially higher (average values found in conventional and treated soybeans for Endosulfan range between 0.1 mg/kg up to 0.6 mg/kg¹).

Evaluating the overall situation, we believe that we could accept in 2010 a slightly higher Endosulfan level than the orientation threshold of 0.01 mg/kg proposed by BNN. However, such a situation will not lead to a reduction of our general control methodology. We propose to set the acceptance level of Endosulfan in organic soy from Brazil for the harvest 2010 to 0.05 mg/kg, which corresponds to 10% of the con-

¹ „Endosulfan in organic soy beans of Brasil“ (Lach & Bruns Report), 22.04.2010

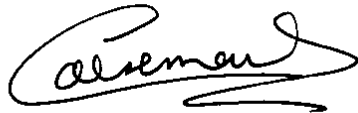
ventional MRL for soy, and therefore permits maintaining a clear differentiation to conventional soy. We hope that you are in agreement with this proposal.

We thank you in advance for your feedback and look forward to hearing from you.

Yours sincerely,



Dr. Rainer Bächli
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P/O 

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Analysis Manager
Ecocert



Alexandre Harkaly
Executive Director
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¹ „Endosulfan in organic soy beans of Brasil“ (Lach & Bruns Report), 22.04.2010