

To: [REDACTED] (TRADE); [REDACTED] (TRADE); [REDACTED] (AGRI)
Cc: [REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE)
Subject: DVC olive oil today
Attachments: Dec 1 DVC Agenda.doc

For US participants and agenda, see attached document.

EU participants: [REDACTED], Agriculture, PT, [REDACTED], Commerce ES, [REDACTED]
Agriculture, IT, [REDACTED], [REDACTED], [REDACTED], Italian olive oil industry, [REDACTED]
[REDACTED] AGRI. Nobody from SANTE.

Difficult discussion.

US is unable to grant import tolerances for any of the EU priorities identified, for various reasons. Organophosphates are being phased out, for pyrethroids the risk cup is full etc. Regulatory alignment is hopeless.

US does not yet commit to the concept of pre-export checks, which would be a second-best solution. It sees that the Division of Import Operations of FDA is particularly sceptical. We were asked to send analytical methods for US to review. This may be seen as a first step towards buying into the concept. EU Member States do not yet agree on a joint strategy.

As a third avenue towards more predictable trade, we will explore procedures, i.e. the possibility of counter analyses, more detailed documentation of analytical results.

The only achievement is a minor concession on lambda cyhalothrin. This substance is allowed as a biocide in the US to be used also in food processing establishments. As a result, a certain level of contamination is tolerated in food. FDA will consider using this as an enforcement level also for imported olive oil instead of a zero tolerance. But this is not definitive.

Agreed Action Points:

EU:

- Provide a survey on olive oil production in the Member States (and if possible a survey on pesticide use on olives)
- Provide some examples of analytical methods to be used in a pre-export checks.
- Verify three EU MRLs in olives Diflufenican, lambda cyhalothrin, procymidon

US:

- Propose dates for next DVC;
- Prepare for a discussion of verification sampling and counter-analysis in case of non-compliant consignments;
- Prepare for discussion of alternatives to the most problematic pesticides;
- Provide clarity on the 'food handling tolerance' for lambda cyhalothrin


European Commission

DG TRADE D3

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