Plant Protection Product Policy

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1.0 Introduction & Purpose

ASDA are focussed on ensuring that their products are sourced in a manner which is safe, ethical and responsible. Whilst it is recognised that Plant Protection Products have an important part to play in economic and viable food production, the purpose of this policy is to promote the use of Integrated Crop Management and Pest Management systems, as a primary focus in farming systems.
Where Plant Protection Products are required to be used, it is our perogative that this must only be conducted where rigorously risk assessed in order to minimise the risks associated with using such chemicals, thus reducing harm to wildlife, the environment, all living organisms and those consuming food products sourced within the ASDA supply base.

2.0 Scope

This policy applies to whole head suppliers, who supply raw material or finished goods, either direct to ASDA or through IPL.

3.0 Sustainability & IPL Approach to Crop Protection

3.1 ASDA Creating Change for Better

ASDA are committed to strengthening environmental standards across their supply base and achieving its Better Planet Nature Goals. Further details can be found at the following location:
https://www.asda.com/creating-change-for-better

3.2 Alignment to LEAF Marque Certification

The LEAF (Linking Environment and Farming) Marque Standard is widely recognised as the leading Environmental Scheme working with farmers, the food industry, scientists and consumers. IPL / ASDA require all UK fresh produce growers to be LEAF Marque certified. Additionally, international growers are to be LEAF Marque certified by end of 2025. For further information and timeframes suppliers are requested to contact their relevant Category Technical contact. In addition, previous communication on this topic is held on the IPL Supplier Portal at the following link https://supplier.ipl-ltd.com/user/login

LEAF work closely with producers, providing tools and services to make meaningful changes on the ground and inspire in pursuit of the ultimate goal — a more sustainable and resilient food and farming chain. LEAF aims to inspire and enable more circular approaches to farming through integrated, regenerative, and vibrant nature-based solutions, that deliver productivity and prosperity among farmers, enrich the environment, and positively engages young people and wider society.

LEAF is based on the principles of continuous improvement and driving circular agriculture. LEAF's IFM approach is based on nine Integrated Farm Management Principles, one of which reviews Crop Health and Protection at individual farm business level.

3.3 Uses of IPM in Production

Protecting crops from weeds, pests and disease is an essential part of Integrated Farm Management (IFM) in order to maintain yields and reduce avoidable losses within production. In an IFM system, Integrated Pest Management (IPM) takes a holistic approach to crop health and protection combining a variety of strategies; cultural, biological, mechanical and chemical.

A range of approaches should be considered to ensure the optimum balance between yield, quality, efficiency and environmental protection are maintained. We encourage the use of IPM strategies across crop production to reduce and minimise the use of Plant Protection Products, ensuring these are only used when absolutely necessary where other strategies would not be successful to the extent required.

The IPL & ASDA Integrated Pest Management Policy is a standalone document which can be accessed via the IPL supplier portal.

3.4 Support for Suppliers

We encourage our growers to promote IPM & bio-diversity techniques during crop production. This may be in the form of (this is not an exhaustive list):

- **Increasing precision** – where pesticides are used, using the right amount, in the right place, at the right time.
- **Reducing environmental impact** – taking measures to ensure the plant protection product does not affect surrounding environments including neighbouring crops and beneficial insects, through the use of drift reduction technology, for example.
- **Preventing point contamination** – reducing the risk of chemical pollution through conscientious behaviour, equipment, handling and storage, for example integrating safety technologies such as the closed transfer system.
- **Nature balancing** – introducing biodiversity measures, promoting habitats for beneficial insects, and working towards a net gain for nature.
- **New varieties** – favouring varieties with characteristics for resistance to known challenges such as disease or viruses.

The IPL Category Technical Team is based both in the UK and overseas. This team work closely with the global supply base to ensure that the sourcing of produce complies with legislation and company standards. Supplier facing, this team is comprised of qualified agronomists and technical specialists, who welcome and encourage a two way approach for interaction within the supply base. Suppliers are encouraged to utilise the expertise of their point of contact.

3.5 Bees and Pollinators

Pollination is a vital ecosystem service that benefits agricultural and horticultural production, and is essential for maintaining biodiversity. By improving the yield, quality and resilience of crops, insect pollination is invaluable to the global economy. Global agricultural output is significantly enhanced by pollination.

There is growing concern regarding the population status of insect pollinators, and in turn, the pollination service they provide. Plant Protection Products have been named as one of the key drivers of the decline in pollinating insects. Alongside insecticides, studies have shown that both herbicides and fungicides can also harm pollinators, both directly and indirectly.

IPL encourages its suppliers to monitor pollinator populations and restore habitats which provide refuge for such species. Key measures for protecting pollinators are listed within the Code of Practice for using Plant Protection Products;
https://www.hse.gov.uk/pesticides/assets/docs/Code_of_Practice_for_using_Plant_Protection_Products_-_Complete20Code.pdf

3.5.1 Bee Connected

We encourage the use of the BeeConnected platform, which is currently a UK based platform to link farmers and beekeepers.

BeeConnected is a new way of undertaking a long-standing practice: farmers informing beekeepers of an intention to apply an insecticide. Currently, best working practice would inform beekeepers when certain crop protection products are used to a nearby apiary.

Farmers can register on the BeeConnected system (on desktop, tablet or smartphone) and then identify a field they are planning to spray with an insecticide by dropping a pin in the on-screen map. This notifies nearby beekeepers who are also registered with the platform, which can be accessed at the following link: https://beeconnected.org.uk

3.5.2 Use of Neonicotinoids

Neonicotinoid insecticides are identified as being potentially harmful to bees and other pollinators. IPL restricts the use of Clothianidin, Imiacloprid and Thiamethoxam within its supply chain and is currently evaluating their use as a whole.

Use of restricted and prohibited actives requires rigorous risk assessment and approval. IPL encourages the use of alternative measures and where application is deemed essential an approved derogation must be agreed prior to use. Details of this derogation process are below. Measures must be in place to ensure that impact is minimised where this is the case.

3.6 Operator Safety

Where Plant Protection Products are used appropriately, any operators must be trained and competent in the safe use of product application equipment. This will be underpinned with risk identification to protect both the operator and any third party exposure. This would include, but not limited to, other workers, nearby dwellings, footpaths and any other public areas.

Key principles of operator safety are underpinned within GFSI guidelines and should be adhered to.

4.0 Customer Engagement & Transparency

Both this policy and the PPP classification list is published and freely available within the public domain. In addition, ASDA continue to publish the results of their pesticide surveillance and monitoring programme as part of the ASDA 'Creating Change for the Better' three pillar strategy for Environmental, Social and Governance initiatives. We actively encourage suppliers to review these results, which can be found at the following location: https://www.asda.com/creating-change-for-better/downloads
Feedback and suggestions on the above are welcomed – suppliers are encouraged to contact their relevant category technical manager.

4.1 Organic Production

ASDA offers a range of products within their fresh produce category. These products are certified independently to national and international Organic standards. ASDA continually works to monitor the range of products within this category, to widen the opportunities for both customer and supplier.

4.2 Product Specifications & Customer Messaging

ASDA works hard to ensure that the product specifications are effectively managed to ensure a balance between meeting customer expectations and maintaining uniformity of products for increased customer satisfaction, whilst ensuring these are realistic and achievable in production. We are absolutely open to dialogue with suppliers regarding specification parameters should there be the potential for a reduction in the use of pesticides as a result.

ASDA supports producers by educating the customer with messages of awareness of impeding factors which may result in their produce having a different appearance to the norm. For example where unpredictable weather events impact the shape, size or regularity of produce.

5.0 Supplier Requirements & Responsible Sourcing

5.1 Supplier Approval

All growers and packing facilities are required to be appropriately certified to independent 3rd party standards. These include but are not limited to the GFSI (Global Food Safety Initiative) or equivalent good agricultural and manufacturing standards, such as Global G.A.P. and Red Tractor Farm Assurance (UK only). In addition, they must comply with the following requirements:

- IPL Technical Requirements Policy for Fresh Produce Suppliers
- Sign up to and maintain an independent proposed plant protection product list for each crop in each country using the IPL nominated online checking service.

- Have an appropriate risk based plant protection product testing schedule in place
- Provide and / or maintain a full list of approved growers via the IPL nominated online platform
- Sign up to the IPL nominated online supply chain mapping platform

Approval of each supplier is reviewed annually or seasonally (as applicable) as a minimum by the IPL category technical team.

5.2 PPP Approval

The supplier will at all times comply with all relevant legislation, regulations and directives in relation to the use of PPPs. Only authorised and genuine plant protection products are to be used.

All programmed suppliers must utilise the IPL nominated PPPL (Proposed Plant Protection List) checking service prior to commencement of supply. All PPPLs must be verified prior to supply and kept up to date throughout the season. ALL testing results carried out by IPL and their nominated independent residue testing provider will be compared to the declared list to measure good agricultural practice (GAP) compliance.

All crops grown in GB / EU must be grown in accordance with Annex 1 of Regulation (EC) 850/2004 on persistent organic pollutants. Suppliers and their growers must not use any of these listed active ingredients. For crops grown outside the EU, there must be a phase out plan agreed for any active ingredients that are currently being applied that are listed in Annex 1 of this regulation.

Please refer to the IPL Plant Protection Product Classification list for details of any additional prohibited, restricted and monitored active ingredients or timelines for phase out. Where phase-out plans are in place they should be adhered to. Where a supplier or the nominated online PPPL checking service has identified an essential requirement to use a plant protection product that appears on the restricted list then a derogation can be requested via the nominated online platform.

5.3 Application of PPP's & Usage Monitoring

Suppliers are required to have appropriate measures in place to ensure all plant protection products have been applied according to label instructions, or alternative respected sources. Suppliers must only permit plant protection products that are approved for specified uses in strict accordance with local and national approvals. Where not possible a documented concession must be obtained from the IPL category technical team.

a) The supplier must be confident in their technical knowledge on plant protection product use and application and/or, where necessary, use the services of a suitably qualified professional advisor (e.g. with a BASIS qualification in GB, or an equivalent scheme in the country of growing). Pesticides will be applied by operators who are trained to the necessary standard using equipment fit for purpose and accurately calibrated.

b) All chemical applications must be based on risk and form part of good integrated pest management (IPM) practices.

Risk assessments should be in place which consider the following (this is not an exhaustive list):

- *Justification for the application etc.*
- *Spray drift from or to neighbouring plots fields etc.*
- *Consideration of previous crops (as applicable), actives applied etc.*
- *Cross contamination risks from equipment e.g. crates / boxes / bags, conveyor belts, sprayers etc.*
- *Consideration of the environment, the applicator and people in the vicinity etc.*
- *Consideration of the location e.g. in relation to risk of cross contamination (spray drift, run off etc.)*

c) The supplier understands that maximum residue limits (MRLs) are reviewed and the supplier must ensure that a system is in place to monitor this. If a MRL has been reviewed, the supplier must ensure that the new MRL applicable in GB and/or EU is not exceeded. Where a divergence has occurred between the GB and EU MRL the supplier must always ensure the lowest limit of the two is not exceeded. This is due to our commitment to supply produce to stores in both the GB and EU. Ignorance of a MRL change in GB and or EU is not an acceptable reason or defence for allowing a residue level to be found in our product that exceeds the applicable MRL in GB and / or EU.

d) All field application records and post-harvest application records must be maintained for all crops. These records must be available for inspection by the IPL category technical team upon request.

e) For produce supplied to IPL packing sites where available independent residue testing is conducted by the IPL nominated service provider. Samples are taken at random by the independent sampler. This allows us to receive the results and react to any exceedance prior to entry to the supply chain. Please refer to the Techncial Requirements Policy for further information.

Produce from other countries where independent residue testing are not available they are tested in the UK by either IPL or the nominated packer.

f) Residue analysis results provided from a source country must be from a laboratory accredited to ISO/IEC 17025 or an equivalent scheme. Contracted laboratories should participate in inter-laboratory comparative tests (ring testing e.g. FAPAS®) and monitor performance in these tests.

g) The supplier plant protection product residue analysis programmes shall be based on risk assessment and analysis should cover, where available to be tested, all active ingredients applied to the crop including seed dressings, pre-emergence, post-harvest treatments and potential contamination from cleaning products. The risk assessment should also include previous crop applications, historical use of the land and likelihood of legacy chemical presence. Suppliers must inform IPL where any residue is found during the analysis program that exceeds the GB and/ or EU MRL. Results from testing carried out by IPL will be compared to the declared list to measure good agricultural practice (GAP) compliance.

h) In the event of a residue detection on an IPL product that exceeds the permitted GB and / or EU MRL, immediate actions will be put in place to protect the consumer. A full investigation will be completed with the supplier to identify the root cause and agree preventative actions to reduce the risk of a future recurrence. In addition, GlobalG.A.P. (or GFSI equivalent), and for GB sites Red Tractor will be notified of the

exceedance, along with the results of any subsequent investigations. We encourage our suppliers to do the same. As part IPL's monitoring of the safe and legal use of plant protection products visits / audits will be conducted by trained auditors. The frequency will be risk based.

i) A top line summary of the results are published on the Asda corporate website. The resulting data is actively reviewed to target suppliers where an excessive number of high risk e.g. 'Restricted and/or Prohibited' actives have been detected. We actively work closely with our suppliers to identify alternatives or other methods to reduce the risk in the future, although on occasion this can lead to the suspension of supply.

6.0 References

The below list is not exhaustive and it remains the responsibility of all suppliers / growers of fresh produce to IPL and their customers to comply with all necessary legislation. Including any subsequent amendments.

- IPL Plant Protection Product Classification list
- Food Safety Act 1990
- EC 178/2002 General Food Safety
- EC 852/2004 Hygiene of Food Stuffs
- The Food Safety and Hygiene Regulation – GB specific as applicable
- The General Food Regulations 2004
- Regulation (EC) 1107/2009 – the placing of plant protection products on the market
- EC Regulation 396/2005 – maximum residue levels in or on food and feed of plant and animal origin
- The Pesticides (Maximum Residue Levels in Crops, Food and Feeding Stuffs) Regulations 2005
- Directive 2009/128/EC sets out a framework for achieving more sustainable use of pesticides by reducing risks and impacts on human health and the environment.
- The Plant Protection Products (Sustainable Use) Regulations 2012
- The Contaminants in Food Regulations 2013 – GB specific as applicable
- EC 1881/2006 – Setting maximum levels for certain contaminants in foodstuffs
- Agriculture Act 2020
- The World Health Organisation (WHO) 'Recommended Classification of Pesticides by Hazard' – https://www.who.int/publications/i/item/9789240005662
- Stockholm Convention on Persistent Organic Pollutants (POPs) - http://chm.pops.int/
- Rotterdam Convention – http://www.pic.int/TheConvention/Chemicals/AnnexIIIChemicals/tabid/1132/language/en-US/Default.aspx
- EU / GB Prohibited and Non-approved Active Substances – https://www.hse.gov.uk/pesticides/pesticides-registration/withdrawal-and-restrictions/banned-and-non-authorised-pesticides.htm
- GB HSE – Pesticides - https://www.hse.gov.uk/pesticides/#
- Expert Committee on Pesticide Residues in Food (PRiF) – https://www.gov.uk/government/groups/expert-committee-on-pesticide-residues-in-food-prif
- EC – Pesticides - https://ec.europa.eu/food/plant/pesticides_en

- EFSA – Pesticides – https://www.efsa.europa.eu/en/applications/pesticides
- Fresh Produce Consortium – Code of Practice for the Control of Pesticides for Produce Marketing Organisations

7.0 GLOSSARY

GFSI – Global Food Safety Initiative
ICM – Integrated Crop Management
IPM – Integrated Pest Management
PPPL – Plant Protection Product Lists
GAP – Good Agricultural Practise
MRL – Maximum Residue Levels
SSE – Sustain Save Exchange
UN – United Nations
LEAF – Linking Environment and Farming