

GLOBAL TRADE & TARIFF LANDSCAPE

April 28, 2020

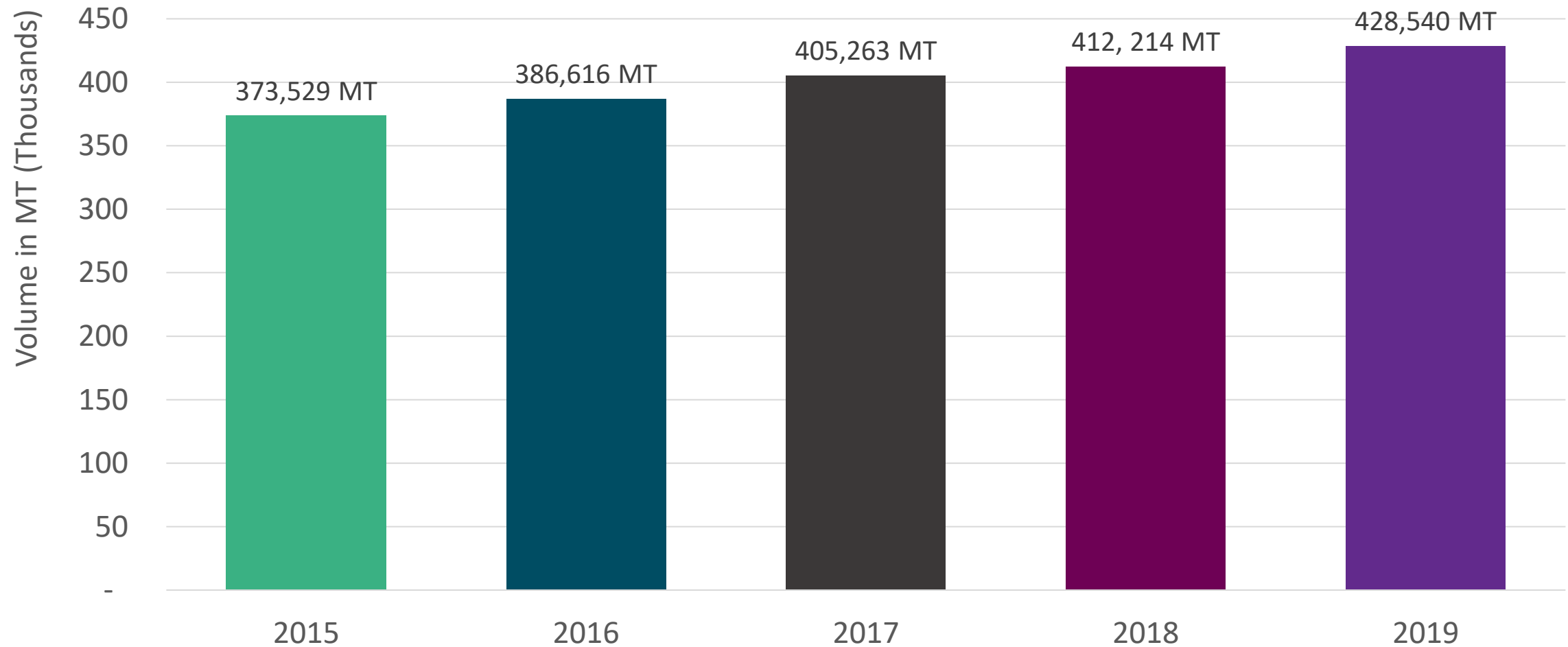
American Spice Trade Association

Bill Bryant
Chairman

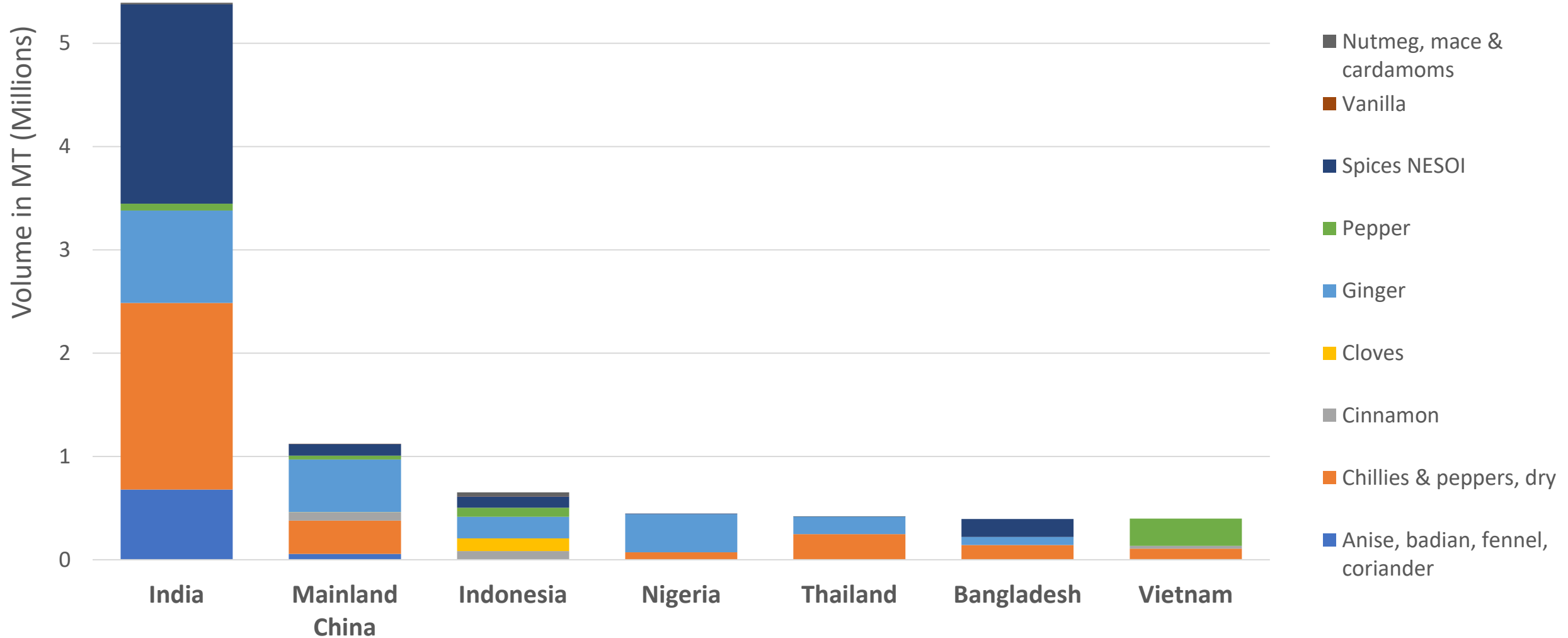


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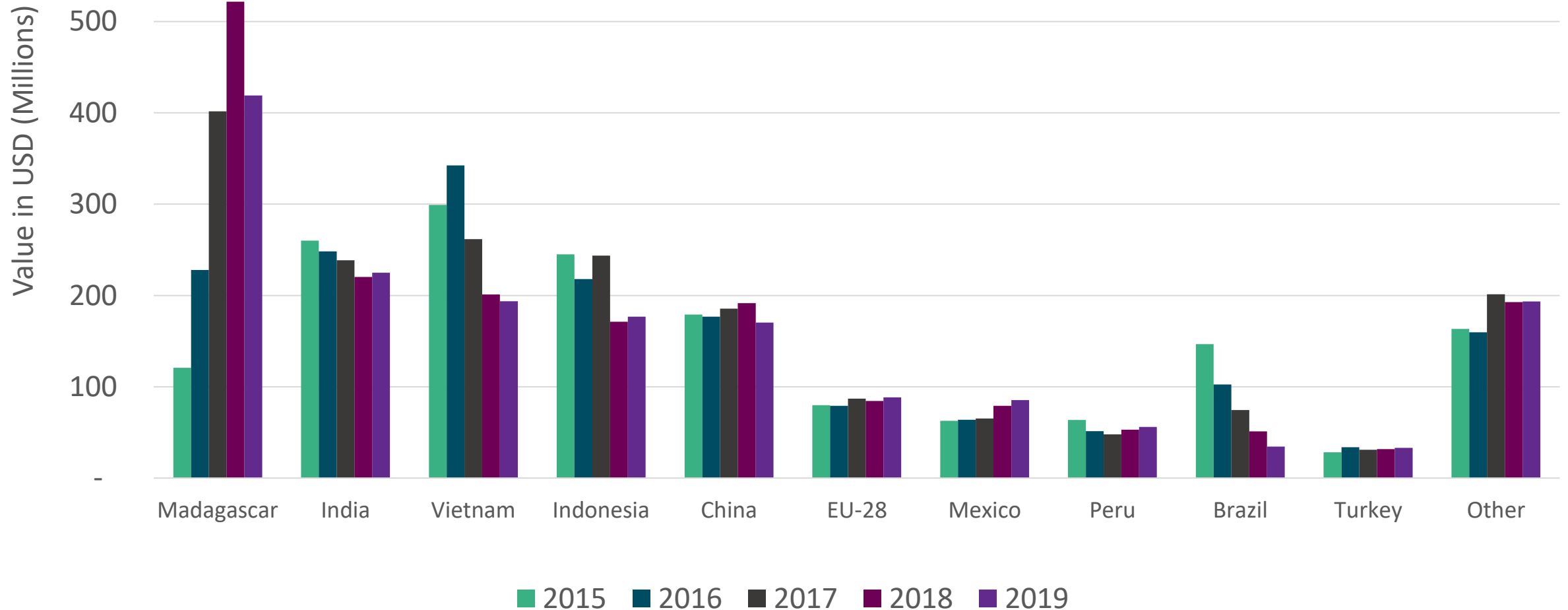
Volume of spice imported into U.S. from world, 2015-19



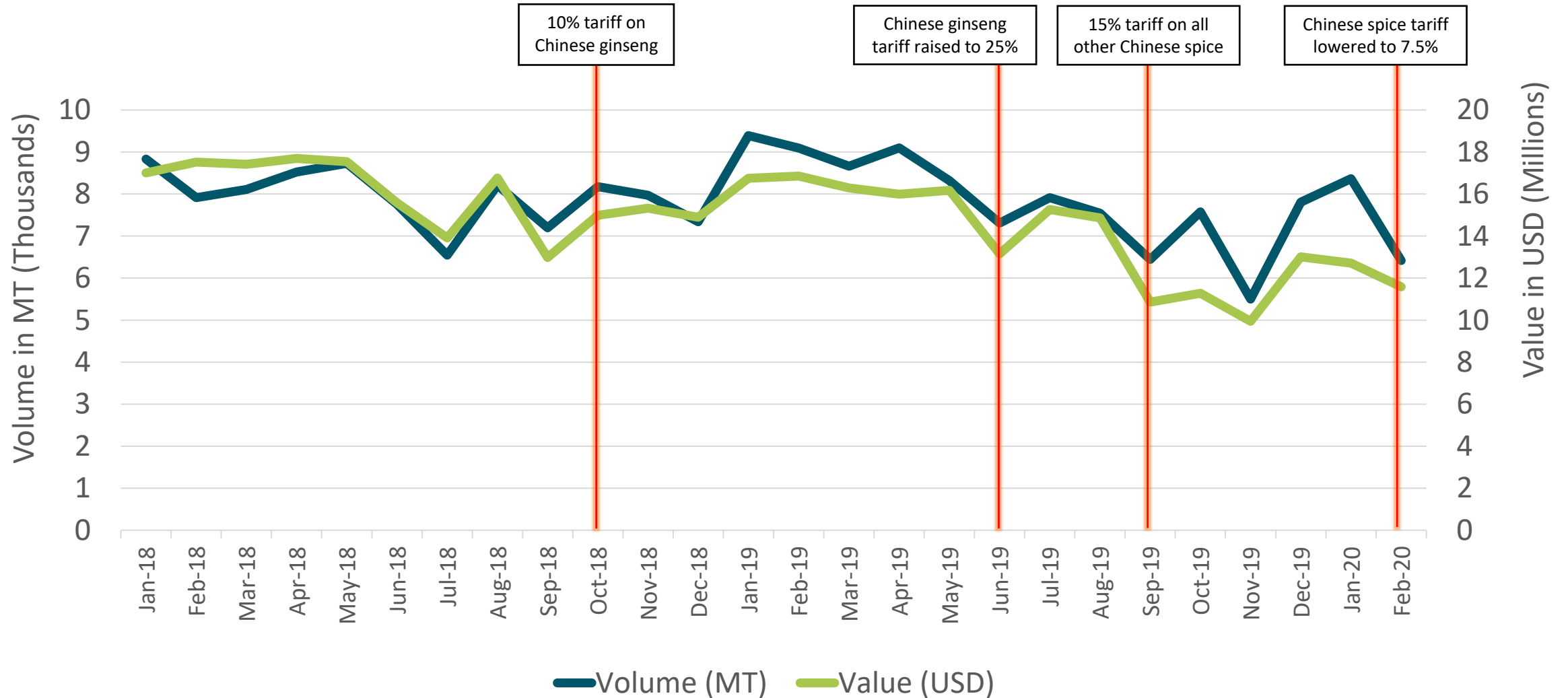
Spice production volume by spice, world's top producers, 2018



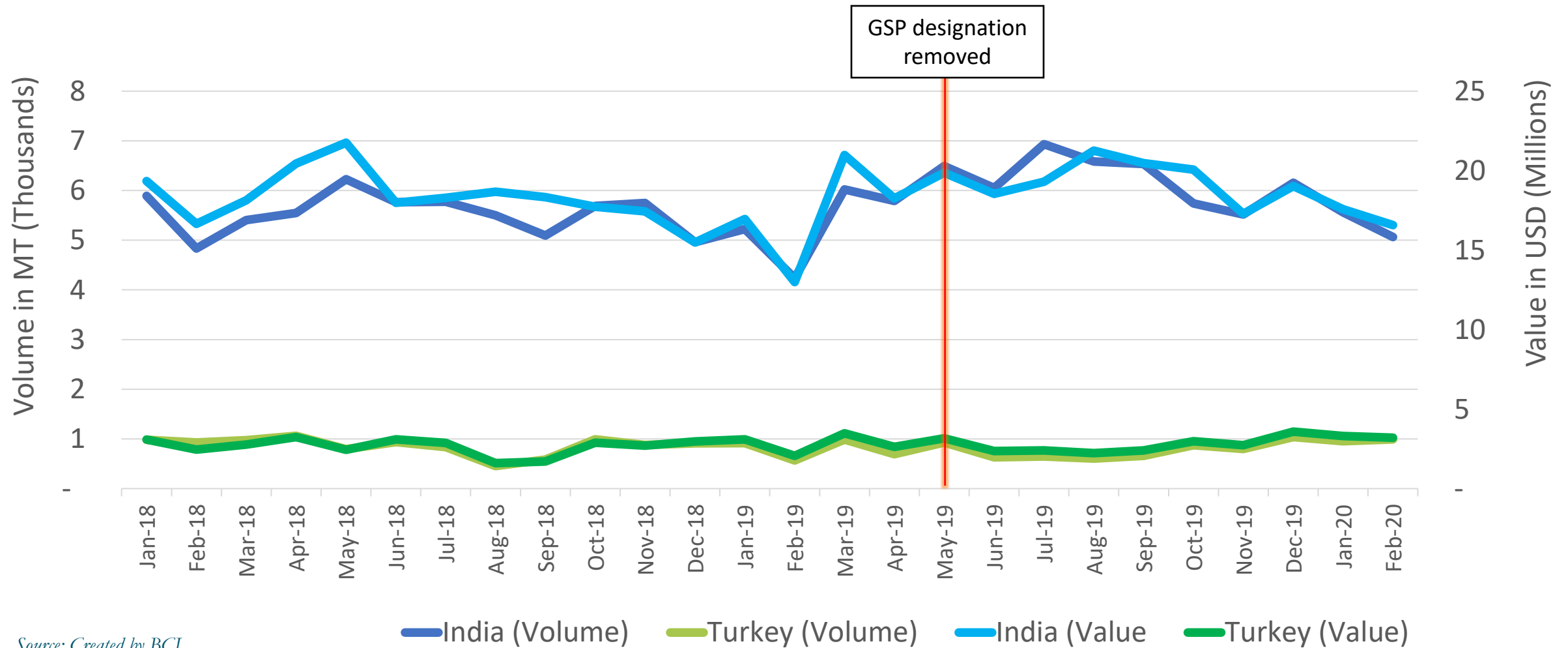
Import value of spice imported into U.S. from top-10 origins, 2015-19



U.S. importation of and retaliatory tariffs applied to Chinese spices

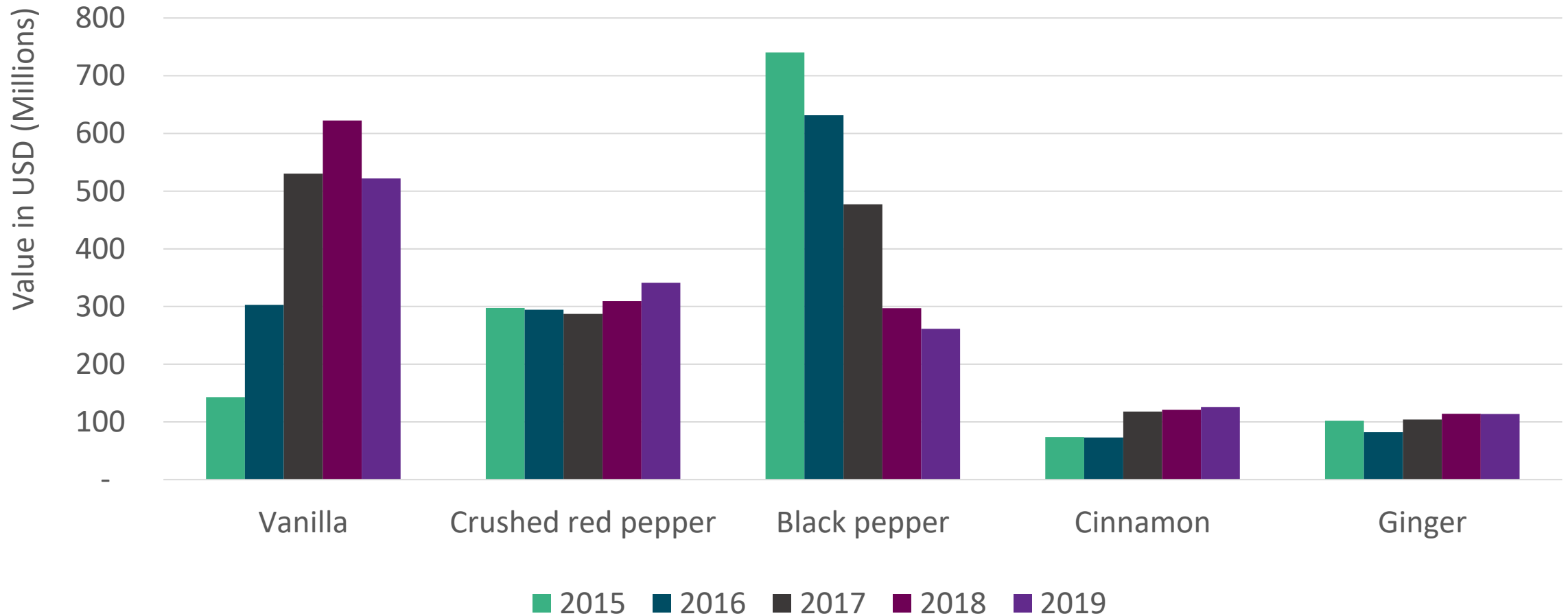


U.S. importation of Indian and Turkish spices

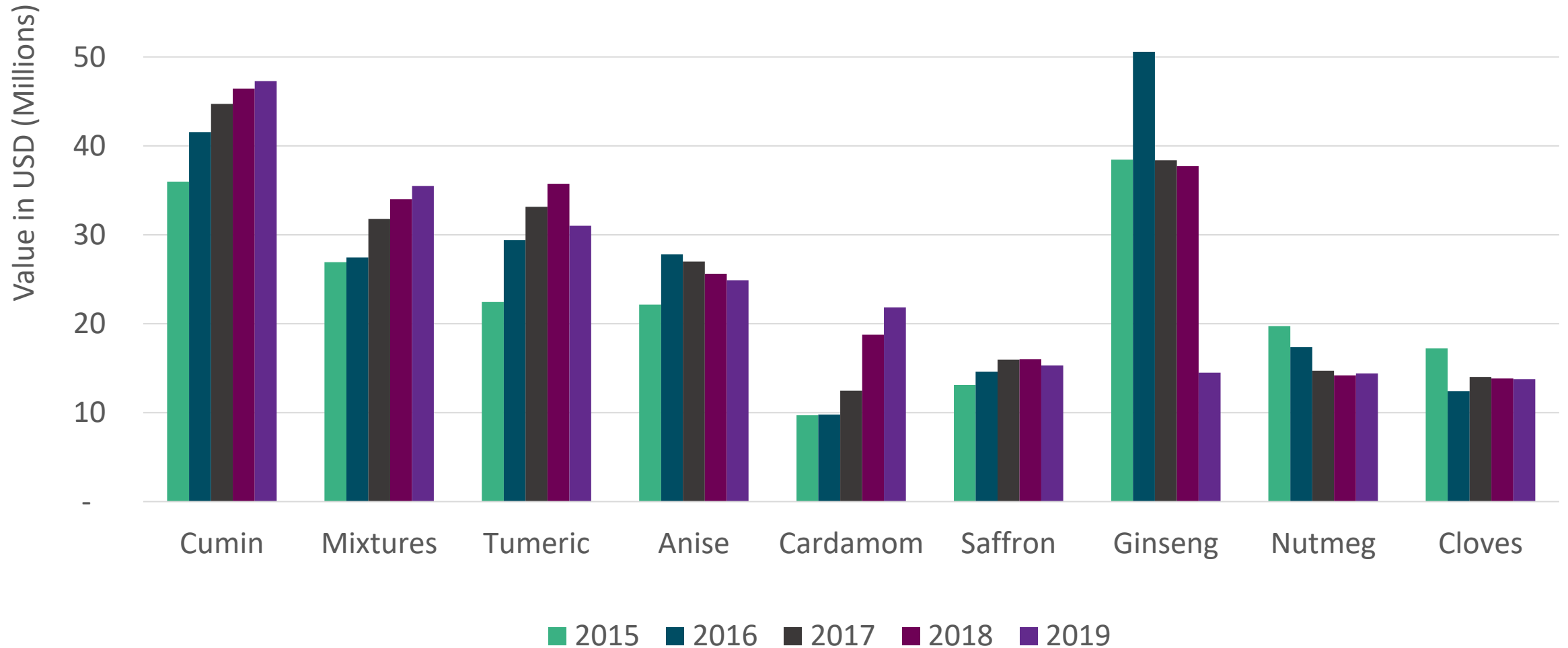


Source: Created by BCI
using USDA GATS data

Import value of spices imported into U.S. by type, 2015-19



Import value of spices imported into U.S. by type, 2015-19



MRL Risk Factors



- Increasing Volumes
- Consumer emphasis on food safety
- National MRLs increasing
- Testing more precise
- Consequences of violations can be severe



Risk Mitigation

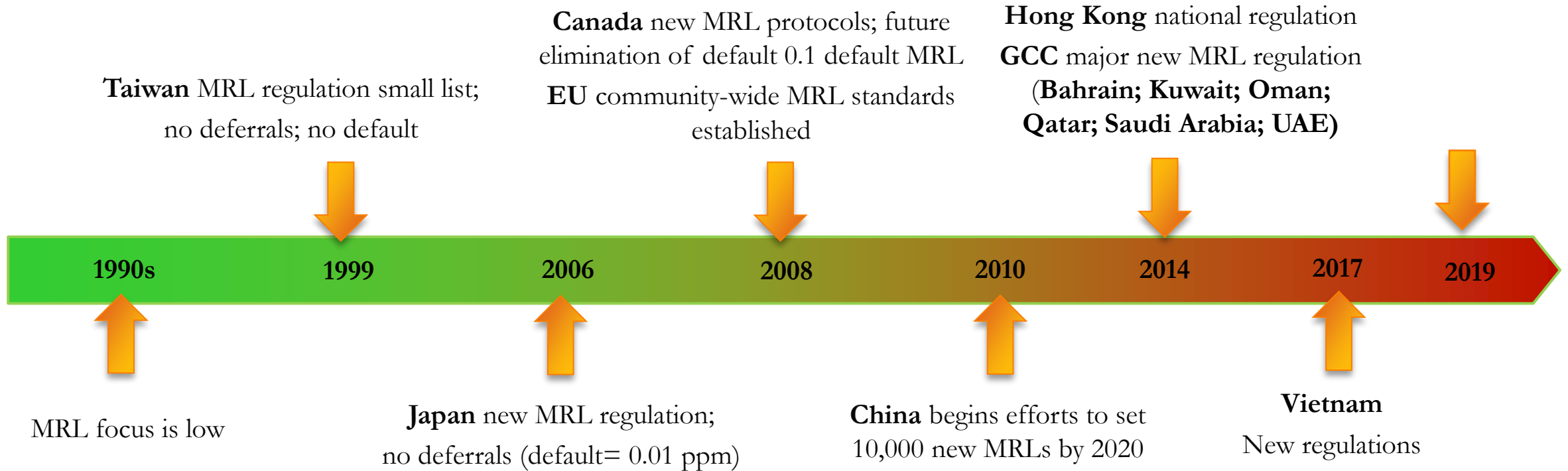
Changing Standards
Identify Exposure



Monitor Changing

- MRLs
- Registrations
- Approaches

Major MRL Revisions



Other markets with new MRL regulations pending: **Mexico; Morocco; Peru, Dominican Republic**

European Union: Approach Revisions

- Negotiations in March
- Corona postponement
- Countries turning inward
(MRLs and Approach)



National Regulating Agencies

Benefits:

- Most accurate
- Always first to notify
- Comprehensive in scope
- Primary source

Challenges:

- Scope of work (hundreds)
- Finding correct sources can be difficult
- Many languages

International Sources

Benefits:

- Centralized
- Background information
- Helpful insights
- Can offer translations

Challenges:

- Not a primary source
- Not comprehensive
- Timeliness
- Inaccuracies in reporting

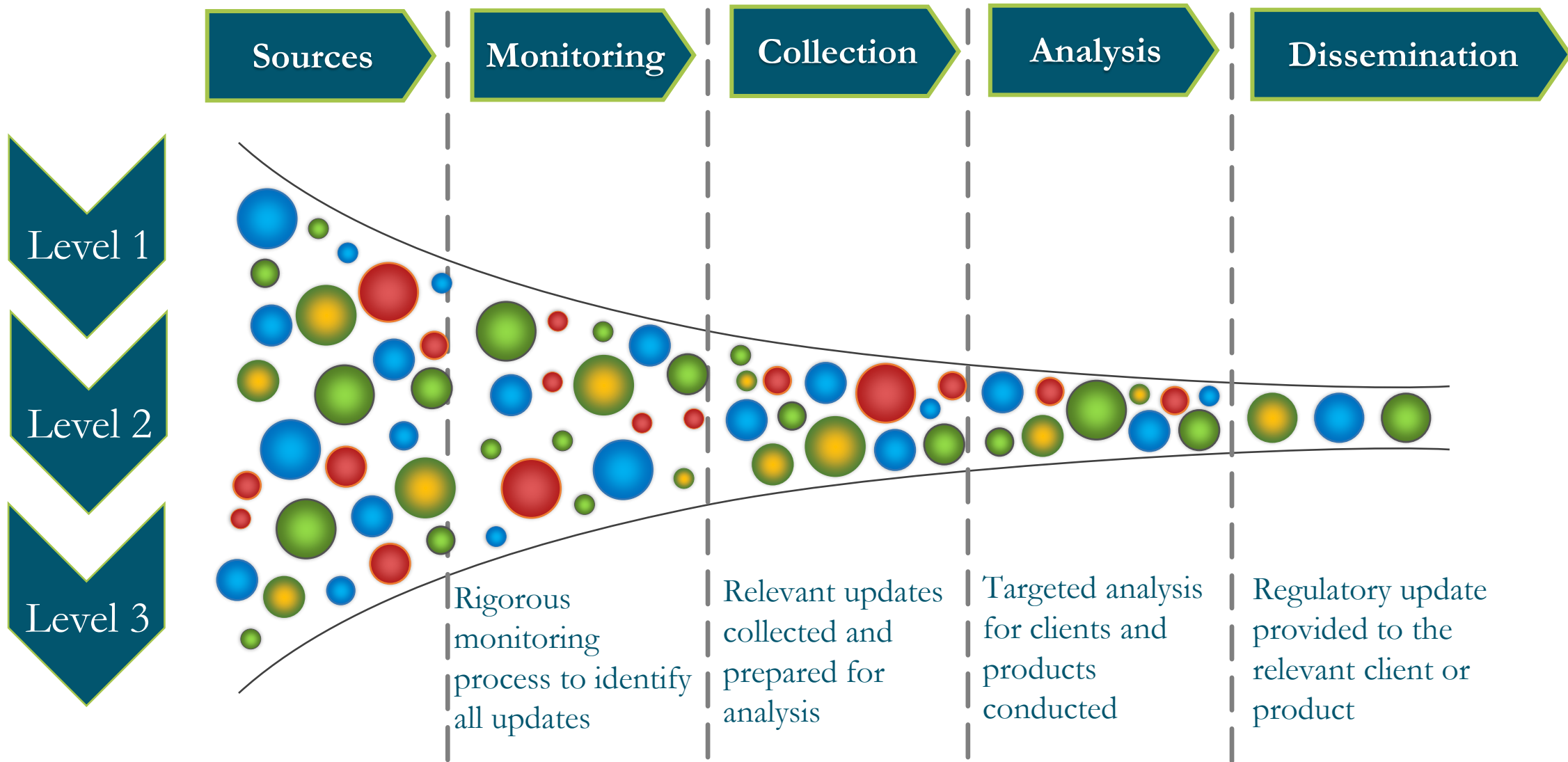
WTO Notifications

Benefits:

- Centralized
- Comment periods
- Enquiry points
- Can offer translations

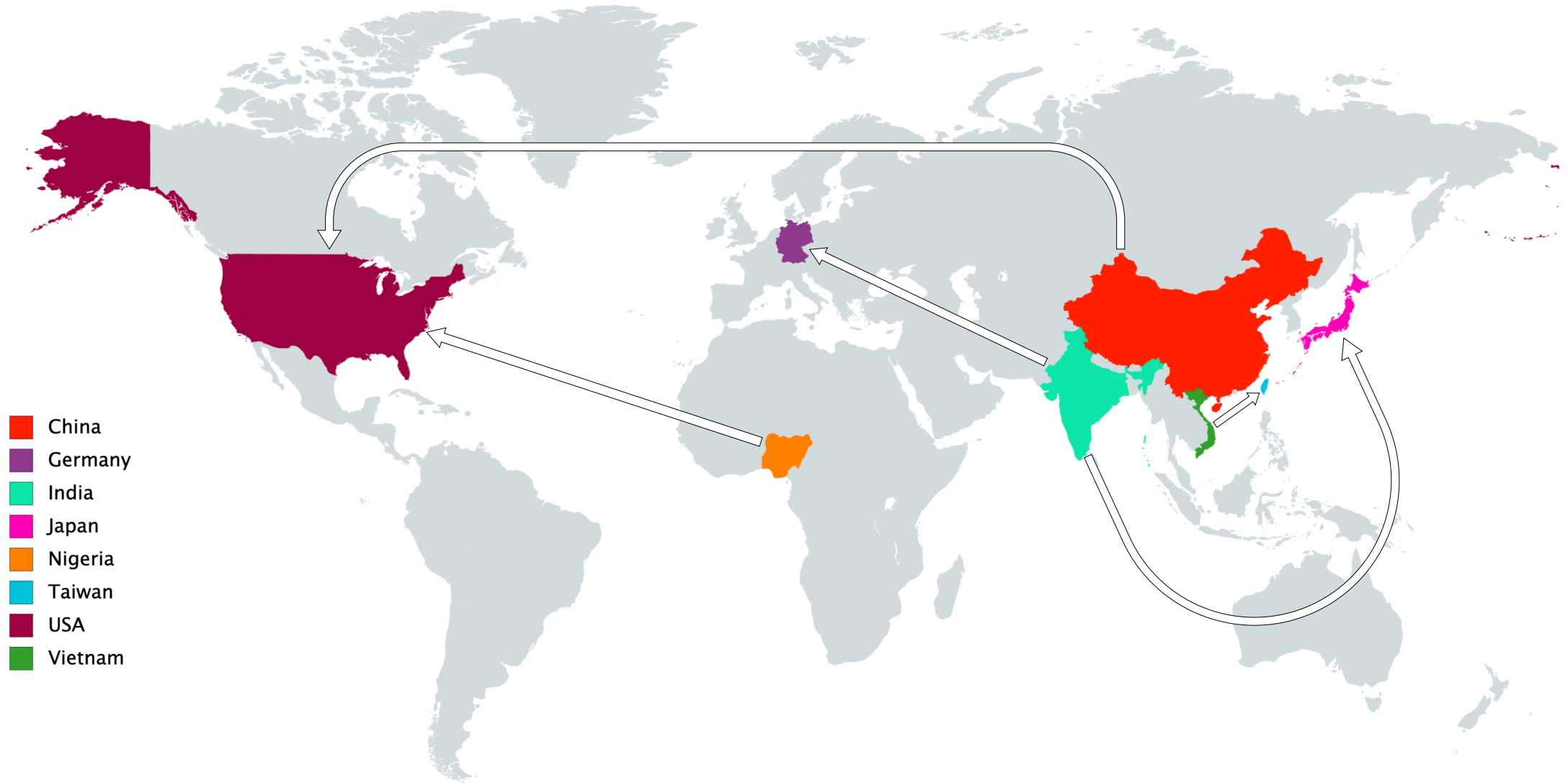
Challenges:

- Not a primary source
- Not comprehensive
- Timeliness
- Inaccuracies in reporting






Exposure



China — pepper



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[Pesticide MRLs](#) [Change Report](#) [Market Info](#) [User Guide](#) [FAQs](#)


Pesticide MRLs





Pepper (spice) / Bifenthrin	
United States	China
—	0.03

Pepper (spice) / Fenvalerate	
United States	China
—	0.03

Vietnam — star anise



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Pesticide MRLs

Star anise / Fenobucarb


United States	Codex
—	—


Taiwan	Vietnam
0.05	—


India — cumin





Cum


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Pesticide MRLs


Cumin, seed / Ethylene oxide


United States	Codex	European Union
<div>7</div> <div>MORE INFO</div>	<div>—</div> <div>MORE INFO</div>	<div>0.1</div> <div>MORE INFO</div> <div></div>
Germany	India	
<div>0.1</div> <div>EU</div> <div>MORE INFO</div> <div></div>	<div>0.01</div> <div>Default</div> <div>MORE INFO</div>	


India — fennel





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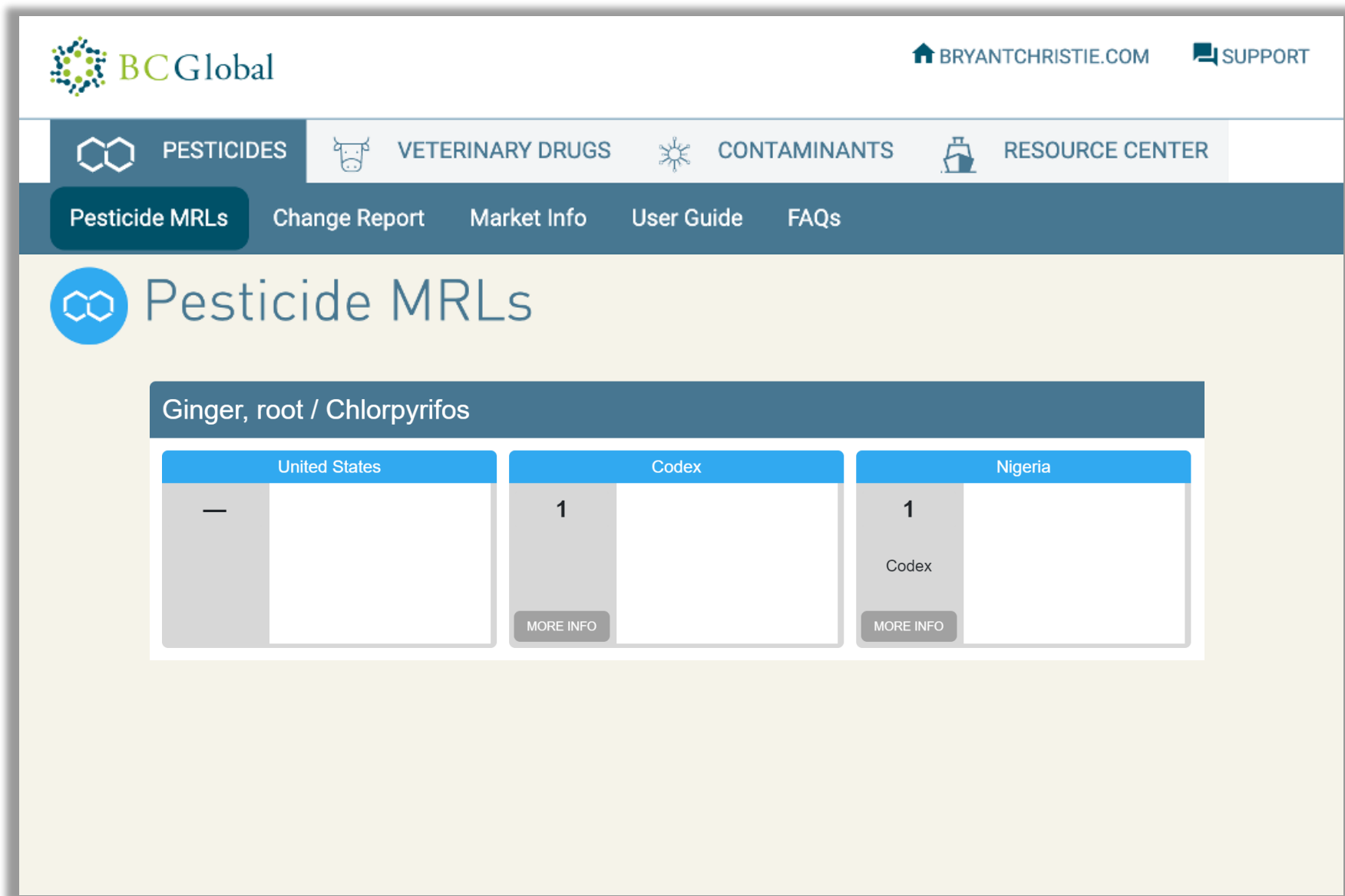


Pesticide MRLs

Fennel, seed / Triazophos

United States		Codex	
—		0.1	
		MORE INFO	
India		Japan	
0.01	Default	0.01	Default
MORE INFO		MORE INFO	

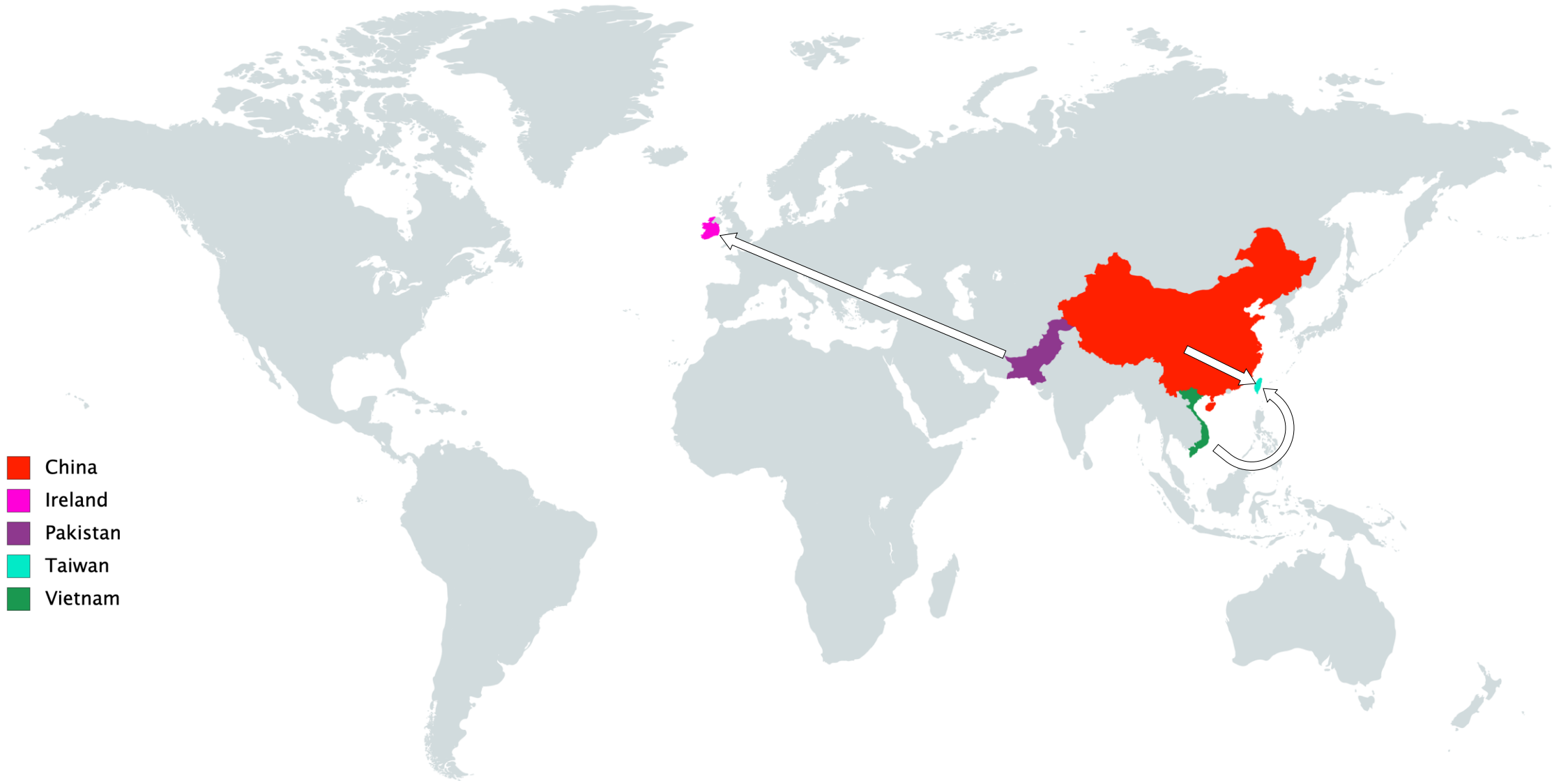
Nigeria — ginger



The screenshot shows the BCGlobal website interface for Pesticide MRLs. The top navigation bar includes the BCGlobal logo, a home icon, the URL BRYANTCHRISTIE.COM, and a SUPPORT link. Below this is a secondary navigation bar with icons and labels for PESTICIDES, VETERINARY DRUGS, CONTAMINANTS, and RESOURCE CENTER. A third navigation bar contains links for Pesticide MRLs (highlighted), Change Report, Market Info, User Guide, and FAQs.


The main content area is titled "Pesticide MRLs" and displays a table for "Ginger, root / Chlorpyrifos". The table has three columns: United States, Codex, and Nigeria. Each column contains a value (—, 1, and 1 respectively) and a "MORE INFO" button.





United States	Codex	Nigeria
—	1	1
	MORE INFO	MORE INFO



Pakistan — mixed spices




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Contaminants
Market Info

Contaminant Limits

Herbs, spices, and seasonings, including salts COLLAPSE SECTION

United States

Aflatoxins, total

Published Commodity	Limit	Status	
Foods	0.02 ppm Action Level	Current	MORE INFO

European Union

Aflatoxins, total

Published Commodity	Limit	Status	
2.1.14 Following species of spices: Capsicum spp. (dried fruits thereof, whole or ground, including chillies, chilli powder, cayenne and paprika); Piper spp. (fruits thereof, including white and black pepper); Myristica fragrans (nutmeg); Zingiber officinale (ginger); Curcuma longa (turmeric); Mixtures of spices containing one or more of the abovementioned spices	0.01 ppm	Current	MORE INFO


Ireland

Aflatoxins, total

Published Commodity	Limit	Status	Deferral	
2.1.14 Following species of spices: Capsicum spp. (dried fruits thereof, whole or ground, including chillies, chilli powder, cayenne and paprika); Piper spp. (fruits thereof, including white and black pepper); Myristica fragrans (nutmeg); Zingiber officinale (ginger); Curcuma longa (turmeric); Mixtures of spices containing one or more of the abovementioned spices	0.01 ppm	Current	EU	MORE INFO

China — pepper




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Contaminants
Market Info


Contaminant Limits


China	Lead		
Published Commodity	Limit	Status	
Seasonings (excluding table salt and spices)	1 ppm	Current	
Spices	3 ppm	Current	
Table salt	2 ppm	Current	

Codex	Lead		
Published Commodity	Limit	Status	
Salt, food grade	1 ppm	Current	


Taiwan	Lead		
Published Commodity	Limit	Status	
Herbs and spices	0.3 ppm	Current	

Vietnam — cumin


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Contaminants

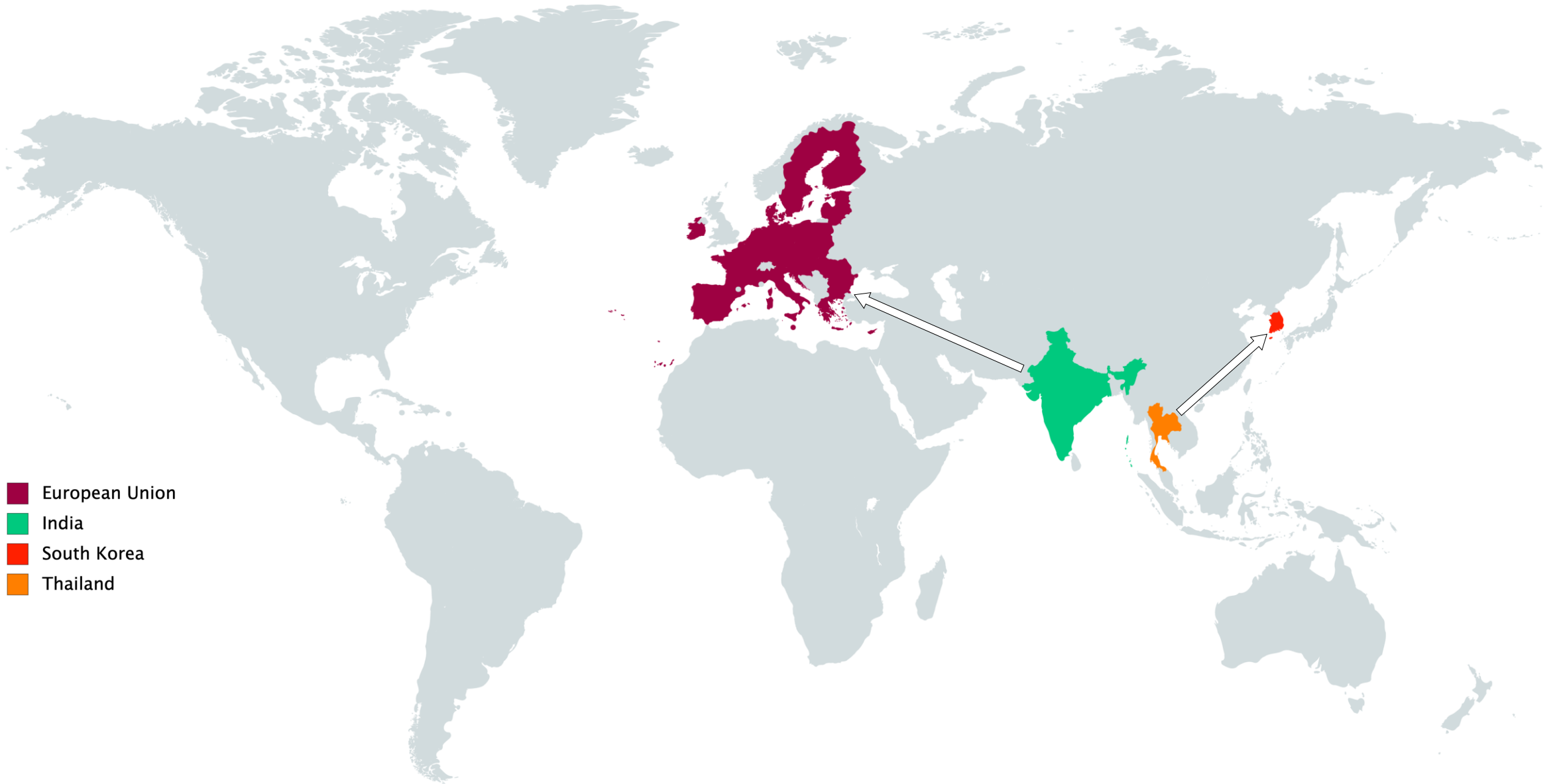
Market Info



Contaminant Limits


Taiwan		Cadmium	
Published Commodity		Limit	Status
Herbs and spices		0.2 ppm	Current
Salt, food grade		0.2 ppm	Current


Vietnam		Cadmium	
Published Commodity		Limit	Status
Salt		0.5 ppm	Current
Spices (including curry powder)		1 ppm	Current




India — chili



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BCGLOBAL

Food Additive Database

[Search](#)

Additive Term Comparisons


Food Category Comparisons

Resources

User Guide

Results

Codex Food Category: [12.02.01 - Herbs and spices](#)

Market	Tech Functions	Food Types and Maximum Levels
Codex	-----	-----
European Union	Colour	08.3.3 Casings and coatings and decorations for meat: Only decorations and coatings except edible external coating of pasturmas Additive Note 35 mg/kg 
India	-----	-----
United States	-----	-----

Thailand — garlic




Food Additive Database

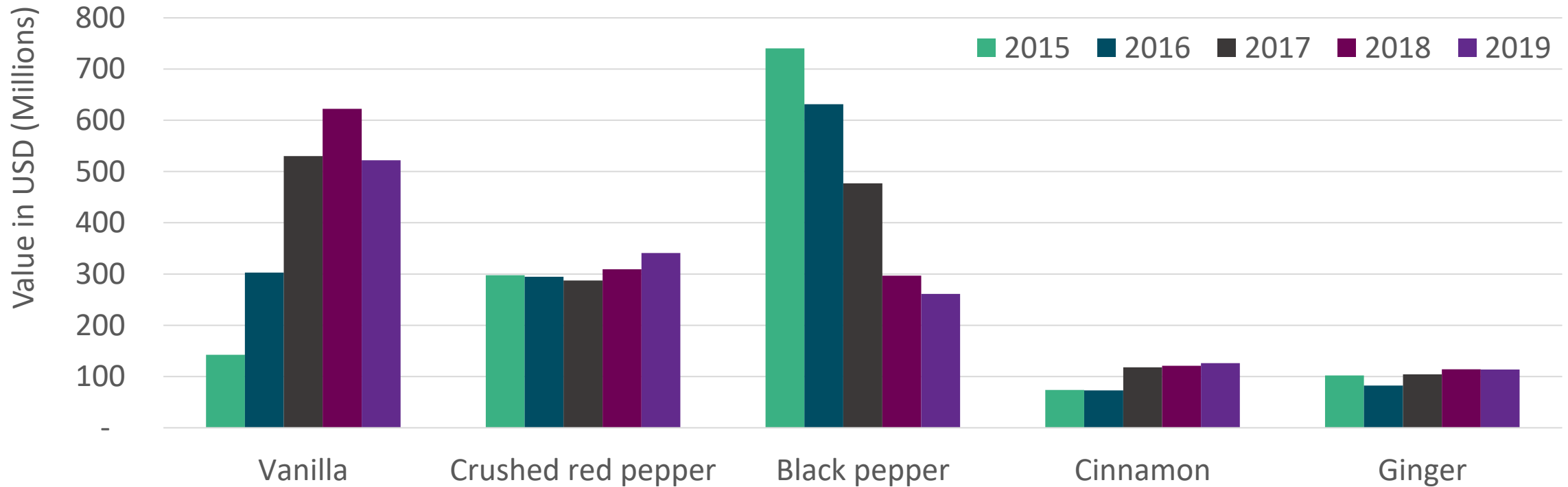
[Search](#)
[Additive Term Comparisons](#)
[Food Category Comparisons](#)
[Resources](#)

Results

Codex Food Category: [12.02.01 - Herbs and spices](#)

Market	Tech Functions	Food Types and Maximum Levels
Codex	-----	-----
Korea	Anticaking agent	Other foods Additive Note 2% 
	Filter aid	Food product Additive Note Should be removed 
Thailand	Anticaking agent Antifoaming agent Carrier	12.02.01 Herbs and spices (Spices only) Additive Note GMP
United States	Anticaking agent	<u>Silicon Dioxide</u> Food 2% 
	Component of an anti-foaming agent	<u>Silica aerogel</u> Food GMP 
	Defoaming agent	<u>Silicon Dioxide</u> Food May be safely used 

Import value of spices imported into U.S. by type, 2015-19

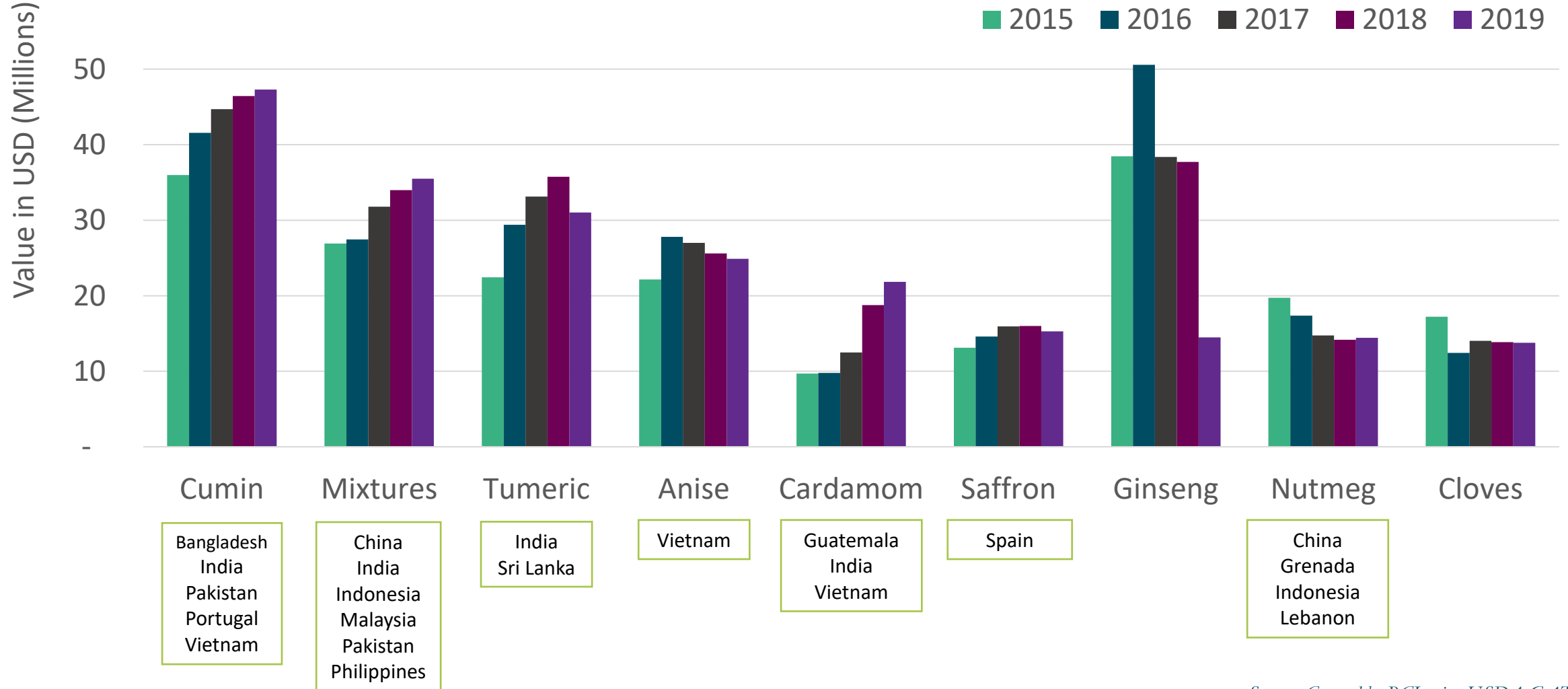


China
Ghana
India
Japan
Malaysia
Thailand
Vietnam

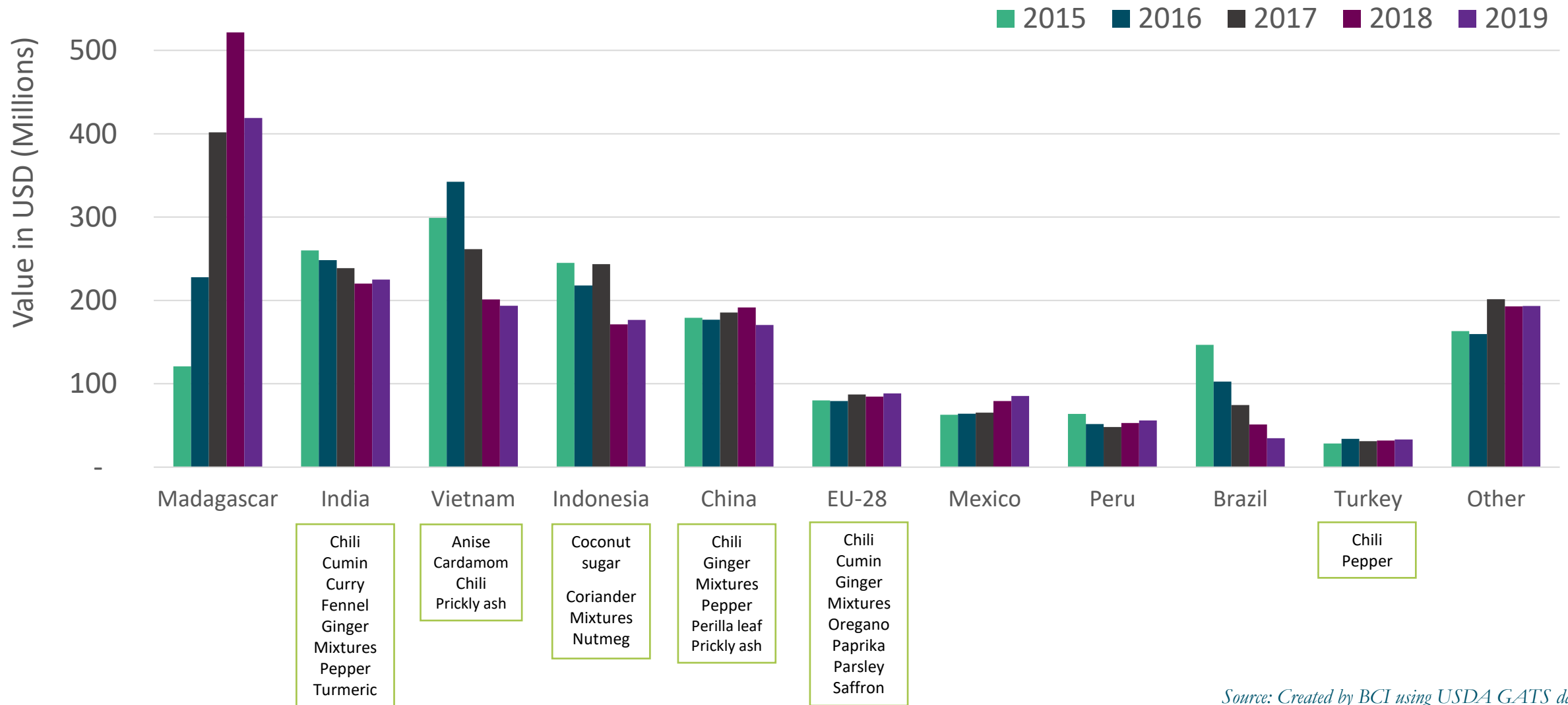
Sri Lanka

China
India
Nigeria

Import value of spices imported into U.S. by type, 2015-19



Import value of spice imported into U.S. from top-10 origins, 2015-19



Thank you

Bill Bryant

bill.bryant@bryantchristie.com

Bryant Christie Inc.

Seattle, WA

