

1 **Trends of pesticide residues in foods imported to the United Kingdom**  
2 **from 2000 to 2020**

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## 28 **Trends of pesticide residues in foods imported to the United Kingdom** 29 **from 2000 to 2020**

30

### 31 **Abstract**

32 A total of 33,911 samples with determined pesticide residues were collated and analysed in the  
33 UK monitoring programme to determine trends in pesticide residue levels in imported foods  
34 during the period of 2000 to 2020. 17,027 of those samples (50.2%) contained detectable residues  
35 while 1,126 (3.3%) exceeded maximum residue levels (MRLs). An increased trend and a  
36 significant shift before and after 2010 in imported foods containing both detectable residues and  
37 exceeding MRLs were found. The main factors responsible for these changes were due to constant  
38 amendments in regulations and legal frameworks. With adoption of Regulation EC396/2005,  
39 there have been major changes that have affected the operations of the UK food monitoring  
40 programme including sampling methods, analysis methods, new MRLs, types of foods, and the  
41 accreditation system. The proportion of imported foods with residues and the amounts of residues  
42 in imported foods varied from country to country. Foods imported from non-European countries  
43 had more non-compliant rates than foods imported from EU. Levels of pesticide residues also  
44 varied between processed foods and unprocessed raw agricultural products and between plant-  
45 based and animal foods. Fruits and vegetables and cereals had higher occurrences of quantified  
46 residues as well as higher MRLs violation rates compared to animal products.

47

48 **Keywords:** food safety; pesticide residues; food monitoring programme; imported foods; the UK.

49

### 50 **Abbreviations<sup>1</sup>**

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MRLs- maximum residue levels,  
Defra- Department for Environment, Food & Rural Affairs,  
FSA- Food Standards Agency,  
EFSA- European Food Safety Authority,  
EC- European Commission, EU- European Union,  
GIS- Geographic Information System,  
PRiF- The Expert Committee on Pesticide Residues in Food,  
FSAI- The Food Safety Authority of Ireland, CAC- Codex Alimentarius Commission,  
HSE- Health and Safety Executive, GLP- Good Laboratory Practice,  
UKAS- United Kingdom Accreditation Service, RASFF- Rapid Alert System for Food and Feed,  
WPPR- Working Party on Pesticide Residues and PRC- Pesticides Residues Committee,  
AFBI- AgriFood and Biosciences Institute,  
SASA- Science and Advice for Scottish Agriculture,  
FERA- Food and Environment Research Agency.

51       **1. Introduction**

52  
53           Protecting agricultural productivity is vital in meeting the rising food needs of the  
54 rapidly growing world population because worldwide losses of crop yields from pests and  
55 diseases can reach approximately 45% (Kolani et al., 2016). Pesticides are extensively  
56 used in agriculture to maintain crops yield and quality, and thus they constitute one of the  
57 main agricultural inputs (Bajwa & Sandhu, 2014). According to the Pesticide Manual 17<sup>th</sup>  
58 edition of the British Crop Production Council, more than 1,600 active substances have  
59 been developed and used as pesticides (Fussell, 2016). Many of them are restricted or  
60 banned due to adverse effects of pesticides on the environment, wildlife and human  
61 health.

62  
63           Harmful pesticide residues in foods pose risks to human health (Blankson et al.,  
64 2016; Cieslik et al., 2011; López-Blanco et al., 2016). The presence of pesticide residues  
65 in foods even at low levels can cause many health problems (Fothergill & Abdelghani,  
66 2013; Kiwango et al., 2018). Therefore, pesticide residues in foods are regulated by  
67 international organizations and national governments (Seo et al., 2013). Many countries  
68 have established their own monitoring programmes to measure pesticide residues in foods  
69 to control the allowable residue levels, also known as maximum residue levels (MRLs)  
70 (Seo et al., 2013). In the UK, monitoring of pesticide residues in both imported and  
71 domestic foods has been carried out since 1977 and results are regularly published in  
72 official reports (Reynolds, 1998).

73  
74           Imported foods, accounted for approximately 50 percent of food consumed in the  
75 UK, increasingly constituting a large proportion of the UK food needs (Defra, 2017).  
76 Imported foods have been controlled and subjected to strict inspection and checks at entry  
77 points (FSA, 2013). However, the UK pesticide residue monitoring results have reported  
78 that imported foods, including from EU countries, have frequently exceed the MRLs  
79 (FSA, 2006). Food samples from abroad also more frequently contained detectable  
80 residues than those from the UK (FSA, 2006). Similarly, annual reports of the EU  
81 monitoring programme have indicated that MRLs of imported foods from outside the EU  
82 were often higher than foods from EU countries (EFSA, 2018a). Poulsen et al. (2017)  
83 analysed the results of the Danish monitoring programme between 2004 and 2011 and

84 found that imported foods were higher than domestic foods in terms of the frequencies of  
85 samples with detectable residues and MRLs.

86

87 Countries exporting foods to the UK must comply with EU MRLs, but both UK  
88 and EU monitoring programmes have revealed that EU MRLs are often violated in  
89 imported foods. These findings have also increasingly concerned regulators, researchers  
90 and consumers (Galt, 2009). The objectives of this study were to assess pesticide residues  
91 in imported foods consumed in the UK and to investigate the trends of pesticide residues  
92 of imported foods from 2000 to 2020. In addition to determining changes in the  
93 frequencies of pesticide residues in imported foods, another objective was to determine  
94 differences between exporting countries by visualising their residue levels using  
95 Geographic Information System (GIS). The GIS technique was used for spatial  
96 assessment of the exporting countries by producing global patterns of pesticide residue  
97 levels in imported foods. The global and spatial patterns created in this study facilitated  
98 the understanding and interpretation of differences in pesticide residue levels of imported  
99 foods among exporting countries.

100

## 101 **2. Material and methods**

102

### 103 **2.1. Data collection and extraction**

104

105 The UK National Reference Laboratories, Food and Environment Research  
106 Agency (Fera Science), AgriFood and Biosciences Institute (AFBI) and Science and  
107 Advice for Scottish Agriculture (SASA), have conducted the analysis of pesticide  
108 residues for the UK monitoring programme (Fera, 2021; PRiF, 2016). The official  
109 laboratories are also accredited to the ISO/IEC 17025 standard, and so the analysis  
110 method applied must meet requirements of the current and valid laboratory criteria (EC,  
111 2017; Fera, 2021). Collected samples have been analysed by the national laboratories  
112 mostly using multi-residue methods based on LC-MS and/or GC-MS instrumentation.  
113 However, polar analytes and other pesticides unsuitable for multi-residue methods have  
114 been also analysed using single residue methods that is more selective.

115

116 Every year, the results of the UK monitoring programme are published as  
117 quarterly and annual reports. Accessible and downloadable reports of the monitoring  
118 programme results are available on National Archives website (data.gov.uk). The data  
119 used in this study were collected from existing reports of UK monitoring programme  
120 results. The data of the 21years between 2000 and 2020 were collated and analysed after  
121 data collection was completed and organized.

122

123 According to structure of the UK monitoring programme, a year is divided into  
124 four periods of three months (i.e. per quarter of a year) and samples of foods are collected  
125 and analysed for each period. Each year, the results of each period are released in four  
126 quarterly reports and the results are published in a series of reports (e.g. 2017 Report on  
127 Quarter 1, 2017 Report on Quarter 2, 2017 Report on Quarter 3, 2017 Report on Quarter  
128 4, and 2017 Annual Report). Quarterly reports were used to obtain data for this study, as  
129 they contained more detailed data. The databases provided by quarterly reports include  
130 records of residue analysis results for each type of foods imported from each country. The  
131 number of samples analysed for pesticide residues, the number of samples with detectable  
132 residues and the number of samples with residues above MRLs were provided for each  
133 record. The databases of quarterly reports also contained the countries of origin of  
134 samples analysed for each record.

135

136 Eighty-four quarterly reports between 2000 and 2020 were examined to extract  
137 the necessary data. The most significant issue regarding data extraction was the  
138 determination of imported foods and countries from where these foods were imported.  
139 Therefore, imported foods were separated from foods of UK origin and this process was  
140 carried out for each year from 2000 to 2020. Countries that exported their foods to UK  
141 were also determined. Then, the data of these foods and their origins of countries for all  
142 years were compiled and these databases were used to produce the annual data in Tables  
143 Supplemental S1 to S4.

144

## 145 **2.2.Statistical analysis**

146

147 The data was statistically analysed to determine whether the change in pesticide  
148 residues followed a changing trend over the years. First, proportion of samples with

149 detectable pesticide residues was calculated. Then, the proportion of samples with  
150 pesticide residues above MRLs was calculated. Linear regression analysis was performed  
151 to test and determine whether there was a significant temporal trend for all annual samples  
152 analysed. The proportion of samples with detectable residues and proportion of samples  
153 above MRLs were also analysed. To detect whether there was a significant shift in  
154 proportion of samples with detectable residues and proportion of samples above MRLs  
155 before and after 2010, sums of annual samples, sums of samples with detectable residues  
156 and samples with residues above MRLs from 2000 to 2010 were determined and then  
157 analysed against those counterparts from 2011 to 2020 assuming a binomial distribution  
158 for proportion of samples with detectable residues and proportion of samples with  
159 residues above MRLs. All the above calculation and analyses were performed in  
160 Microsoft Excel.

161

### 162 **2.3.Data processing for GIS maps**

163

164 The study was also aimed to create global and spatial maps that allowed the  
165 visualisation of pesticide residue data from foods imported to the UK. GIS maps, which  
166 were created using the data on foods imported from each country, provided spatial  
167 patterns in detectable pesticide residues and MRLs in foods of these countries. To prepare  
168 the spatial data for map presentation, the total number of samples of each country was  
169 calculated from all imported samples analysed during 2000-2020. Samples with  
170 detectable residues of each country and samples exceeding MRLs of each country were  
171 each calculated as percentages. The data used in GIS maps were processed using  
172 Microsoft Excel. QGIS software was used to create maps for visualization of pesticide  
173 residue data.

174

## 175 **3. Results and Discussion**

176

### 177 **3.1.Trends of pesticide residues**

178

179 A total of 33,911 analysed samples from imported foods were reported in the UK  
180 pesticide residue-monitoring programme during the 21years from 2000 to 2020 to check  
181 for pesticide residues (Supplemental Table S1). Out of the total 33,911 analysed samples,

182 17,027 of those samples (50.2%) contained detectable residues and 1,126 of total  
183 analysed samples (3.3%) were above MRLs.

184

185 Figure 1 shows the number of imported food samples analysed annually for  
186 pesticide residues by the UK monitoring programme between 2000 and 2020. The  
187 number of samples analysed in 2000 was smaller than half of the annual total food  
188 samples in the following years. The numbers of annually analysed samples have stabilised  
189 after 2001. However, the number of total samples analysed in 2020 showed a sharp  
190 decline. This could be caused by the disruptions in activities both in imports and in staff  
191 restrictions during lockdown due to COVID-19 pandemic. There was no statistically  
192 significant change in annual samples analysed after 2000 ( $p > 0.31$ , Figure 1). The reason  
193 for this was the introduction of major changes and innovations in sampling methods since  
194 2001, and the legalization of these changes and innovations with Directive 2002/63/EC  
195 adopted in 2002 (EC, 2017; EFSA, 2013). In fact, the biggest change in the sampling  
196 methods was made by this directive that introduced the representative number of samples,  
197 which took account of the population size for the number of products analysed in each  
198 country (FSAI, 2009). Before this directive, the UK monitoring programme implemented  
199 sampling methods according to Codex Alimentarius Commission (CAC) guidelines set  
200 in 1993 (EC, 1999).

201

202 **Figure 2 and 3** show changes in the proportion of imported samples containing  
203 detectable residues and samples with residues above MRLs from 2000 to 2020. It was  
204 found that there were apparent increases in the annual proportion of samples with  
205 detectable residues and exceeding MRLs and the general trends were statistically  
206 significant ( $p < 0.01$  in both cases). Of note, MRLs did not change much after 2010,  
207 suggesting that a change in legislation brought about a stabilisation of contaminated food  
208 imports. Annual EU reports stated that there was an increased trend in the annual number  
209 of imported and domestic foods with measurable pesticide residues and MRLs  
210 exceedances (EFSA, 2018a). Similarly, Nordic Projects performed by Hjorth et al. (2011)  
211 and Skretteberg et al. (2015) reported the increased trends in pesticide residues in  
212 imported foods.

213

214 To detect whether there was a significant shift in proportion of samples with  
215 detectable residues and proportion of samples with residues above MRLs before and after  
216 2010, total annual samples with detectable residues and samples with residues above  
217 MRLs from 2000 to 2010 were analysed against those counterparts from 2011 to 2019  
218 (i.e. the abnormal data point in 2020 was excluded) assuming a binomial distribution.  
219 Binomial distribution analysis was assessed approximately using the rejection region (z  
220 value of 1.96 at  $p=0.05$ ) in a normal distribution because of many samples used. As a  
221 result, there was a significant shift in the proportion of total detectable samples before  
222 and after 2010 ( $z=27.2491$ ) in samples with detectable residues. The calculated  
223 proportion of samples with detectable residues was 45.0% before 2010 while the  
224 calculated proportion of samples with detectable residues was 56.7% after 2010. The  
225 proportion of samples exceeding MRLs has also significantly changed before and after  
226 2010 ( $z=10.7692$ ) in samples with residues above MRLs. The calculated proportion of  
227 samples with residues above MRLs was 2.5% before 2010 while the calculated proportion  
228 of samples with residues above MRLs was 4.3% after 2010. Importantly, however, no  
229 significant increases in detectable pesticide residues and MRLs were observed after 2010.

230

231 It is important to point out that the changes in pesticide residues can be affected  
232 by several factors such as legal frameworks, structure of the monitoring programme and  
233 introduction of new pesticide use patterns (EFSA, 2013). However, it can be argued that  
234 the main reasons that affected the changes are regulations that have been substantially  
235 amended several times.

236

237 Until Regulation EC 396/2005 adopted in 2005 and fully harmonized in  
238 September 2008 throughout the EU, the UK like all other EU Member States, had its own  
239 pesticide regulations and national MRLs (FSAI, 2009). With the introduction of this  
240 pesticide residue regulation, substantial changes and developments occurred in pesticide  
241 residue regulations, directives and decisions (Fussell, 2006). This new legislative  
242 framework consolidated and replaced all existing pesticide residues directives, such as  
243 90/642/EEC (plant products), 86/363/EEC (foodstuffs of animal origin), 86/362/EEC  
244 (cereals), and 76/895/EEC (fruits and vegetables) (Fussell, 2006; FSAI, 2009). This new  
245 regulation also replaced all old national MRLs and provided for full harmonisation of  
246 MRLs in the EU (Delcour et al., 2015; EFSA, 2013). Additionally, with the introduction

247 of EC 396/2005, UK pesticide regulations, The Pesticides (Maximum Residue Levels in  
248 Crops, Food and Feeding Stuff) Regulations 1997, which was amended in 1999 and  
249 2001, was renewed as The Pesticides (Maximum Residue Levels) (England and Wales)  
250 Regulations 2008 (legislation.gov.uk, 2008). These changes in both EU and UK pesticide  
251 residue regulations has led to major structural changes and improvements in the UK  
252 monitoring programme.

253

254 Due to Regulation EC 396/2005, there have been significant innovations and  
255 changes in the design of monitoring programmes, such as method of sampling, method  
256 of analysis, pesticides sought, and the MRLs (HSE, 2015). Article 27 of EC 396/2005 set  
257 out the sampling method of monitoring programmes, such as product type and number of  
258 samples analysed (EC, 2005). According to sampling methods set by this regulation,  
259 sufficient number of domestic and imported products should be analysed every year, and  
260 the number of products analysed in each country is expected to reflect population size,  
261 and thus the number of samples analysed each year is expected to be updated (EC, 2005).  
262 Product type should also be determined according to dietary consumption patterns of each  
263 country provided that most of them are fresh agricultural products (FSAI, 2009).  
264 Allocation of the majority of analysed product types into fresh fruits and vegetables may  
265 directly affect changes in numbers and proportions of foods containing pesticide residues  
266 because fresh produce contains higher frequencies and quantities of pesticide residues  
267 than processed, animal or cereal food samples (EFSA, 2018a; FSA, 2006). Galt (2010)  
268 also found linear relationships between volumes of analysed samples and MRLs violation  
269 increases.

270

271 Article 28 in Regulation EC 396/2005 sets out analysis methods for pesticide  
272 residues in monitoring programmes, and the analysis method applied must meet  
273 requirements of the current and valid laboratory criteria (EC, 2005). Directive  
274 882/2004/EC adopted in EU to provide the current and valid laboratory criteria with the  
275 ISO/IEC 17025:2005 accreditation that imposes all official control laboratories used in  
276 monitoring programmes (EC, 2017). Guidelines, which determine laboratory criteria, are  
277 constantly changed and updated with technological advances (EFSA, 2013). Until the  
278 accreditation of ISO/IEC 17025, the official control laboratories used in the UK  
279 monitoring programme were accredited with Good Laboratory Practice (GLP) or United

280 Kingdom Accreditation Service (UKAS) (EC, 1999). The ISO/IEC 17025 accreditation  
281 incorporates analysis methods and methodology that are constantly improved and  
282 renewed through technological developments as well as keeping the analysis methods up-  
283 to-date, which increases the quality and accuracy of the results in the control laboratories  
284 (Fussell, 2016). This means that the latest analytical methods allowed measurement of  
285 residues at low levels and ensured that the residue results were more accurate and reliable  
286 (PRiF, 2016).

287

288 Official laboratories accredited with ISO/IEC 17025 started to be established in  
289 2006 and most of EU Member States, including the UK and accredited their control  
290 laboratories as of 2010 (EFSA, 2013, Fussell, 2016). We found significant increases in  
291 the proportions of samples with detected pesticide residues ( $z = 27.2491$ ) and samples  
292 exceeding MRLs ( $z = 10.7692$ ) after 2010. This substantial change may be attributed to  
293 new analytical methods and improvements provided ISO/IEC 17025 accreditation to  
294 official control laboratories (EFSA, 2013; Fussell, 2016). Furthermore, the annual  
295 number of samples with pesticide residues and MRL violations increased over time. PRiF  
296 (2016) has reported that UK monitoring programme uses state-of-the-art methods for  
297 residue analysis, which means that it was expected to see an increase in the number of  
298 active substances detected and samples containing pesticide residues.

299

300 Up to EU-harmonized MRLs, pesticide residues were evaluated in the UK  
301 monitoring programme according to UK, EU and Codex MRLs (HSE, 2015). Since the  
302 fully harmonized EU MRLs were provided by EC 396/2005 in September 2008, it can be  
303 considered that a major factor affecting the results of the monitoring programme was the  
304 MRLs which were amended by this regulation. The EU MRLs for more than 500 active  
305 substances and about 370 foods are defined and the default MRLs (0.01 mg/kg) was used  
306 for the unspecified active substances in this regulation (EFSA, 2018a). Regulation EC  
307 396/2005 not only modified the MRLs, but also led to an increase in the number of MRL-  
308 defined active substances, which result in an increase in the number of pesticides sought  
309 in monitoring programmes (Fussell, 2006). With this regulation, new types of foods, such  
310 as cocoa, coffee and sugar beet, were also included, and thus there was an increase in the  
311 number of products exceeding MRLs, which meant that greater numbers and types of  
312 products were analysed in monitoring programmes (Fussell, 2006). In short, more

313 numbers of foods containing pesticide residues were determined in the monitoring  
314 programmes due to expanded analytical scopes, greater numbers of foods analysed, and  
315 more active substances sought (EFSA, 2013).

316

317 MRL values are the levels determined for safe exposure of people to pesticide  
318 residues in foods (Winter & Jara, 2015). Under Regulation EC 396/2005, proposals are  
319 made on a regular basis to improve, change or delete MRLs (EC, 2005). The Food  
320 Standards Agency (FSA) established in 2000 and European FSA (EFSA) established in  
321 2002 are considered two important agents for proposals made for potential changes to  
322 MRLs (Fussell, 2006). FSA principally focuses on consumer protection and thus notices  
323 Rapid Alert System for Food and Feed (RASFF) for risky foods analysed in monitoring  
324 programmes (PRiF, 2016). EFSA has performed risk assessment and communication, but  
325 it began to perform the risk assessment needed for all MRLs with the adoption of  
326 Regulation EC 396/2005 in 2008 (Fussell, 2006). The proposals for MRLs arrangements  
327 are based on EFSA opinions under Regulation EC 396/2005. In short, the establishment  
328 of FSA and EFSA and their activities on MRLs can consider two important political  
329 issues because setting, modifying or deleting of MRLs directly affected the results of  
330 pesticide residue analysis.

331

332 Studies on toxicological reference values for pesticide residues are continuously  
333 carried out and thus some MRLs values are lowered (EFSA, 2018a). Lowered MRLs  
334 directly affected the results of pesticide residue analysis and may cause an increase in the  
335 number of samples with residues. Furthermore, MRLs values have been changed and  
336 regulated for many reasons. To date, changes and amendments in commodities and  
337 pesticides for which MRLs are set have been made with many MRLs and pesticide  
338 residues regulations. Although new laws and regulations on MRLs have been introduced  
339 from time to time, the biggest change may be from Regulation EC396/2005 because a  
340 large number of new active substances and products have been introduced in which the  
341 MRLs have been set for the first time (EC, n.d.; HSE, 2012). Since 2009 and 2010, this  
342 regulation and its new schemes have been implemented by all EU Member States,  
343 including the UK (EFSA, 2013). The UK has included these new products and active  
344 substances in its monitoring programme and can be considered one of the major reasons  
345 for the significant change after 2010.

346

347 Under Regulation EC396/2005, each member state is obliged to update its  
348 national monitoring programmes in accordance with the existing regulations and to fulfil  
349 their requirements (EC, 2005). Therefore, the UK monitoring programme had then been  
350 subjected to an indirect but effective change with amended and renewed regulations and  
351 directives mentioned above. However, it can be claimed that it was influenced by the  
352 changes in its own managerial structure. The HSE is responsible for both monitoring of  
353 pesticide residues and implementation of EU MRLs in the UK (HSE, 2015). PRiF has  
354 carried out the UK monitoring programme on behalf of the HSE (PRiF, 2016). However,  
355 official bodies responsible for conducting the UK monitoring programme before PRiF  
356 were Working Party on Pesticide Residues (WPPR) and Pesticides Residues Committee  
357 (PRC) (Defra, 2018). Since each management period has been designed to expand with  
358 regard to number of samples and product types analysed and active substances sought  
359 and to ensure more independent and reliable works, changes in the official bodies may  
360 affect the structure of monitoring programme and thus resulting in changes in pesticide  
361 residues (PRC, 2000; PRiF, 2016).

362

363 Finally, it should be pointed out that the results of the 21-year pesticide residues  
364 were influenced by the legal regulations and directives set for product groups, such as  
365 baby foods. Since 2009, all member states have also been required to analyse at least 10  
366 products from infant formula and foods (EFSA, 2013). As infants and young children are  
367 the most affected groups of pesticide residues, more restrictive regulations are being  
368 introduced with ongoing legal arrangements (EFSA, 2018a). The compulsory inclusion  
369 of baby foods in monitoring programmes may lead to changes in the trends of food  
370 samples analysed and residue levels.

371

### 372 **3.2.Differences between exporting countries**

373

374 The distribution of imported foods by country and by country groups separated as  
375 European and non-European countries is shown in Supplemental Table S2. The total of  
376 33,911 food samples was distributed to 125 different countries during the period 2000-  
377 2020. 16,440 samples imported from non-European countries had more non-compliant  
378 rates (detectable rate 53.7%; MRL exceeding rate 5.6%) than foods (17,471 samples)

379 imported from European countries (detectable rate 47.0% and MRLs exceeding rate  
380 1.2%).

381

382 From Supplemental Table S2, five points can be highlighted. First, the majority  
383 of food samples analysed came from Spain (20.2%). The other important countries with  
384 the highest number of analysed samples were South Africa (7.5%), the Netherlands  
385 (7.0%), Italy (6.8%), France (5.0%), India (3.6%), the United States (3.4%), Belgium  
386 (3.2%), Israel (2.8%), Chile (2.8%), New Zealand (2.6%), Brazil (2.5%), Egypt (2.5%)  
387 and Kenya (2.1%). Samples from these countries with detectable residues included Chile  
388 (77%), South Africa (74.8%), Brazil (68.3%), Belgium (57.6%), Spain (56.2%), India  
389 (55.1%), Egypt (51.3%), the United States (46.1%), the Netherlands (46.0%), Kenya  
390 (45.7%), and France (43.6%). Moreover, some of these countries with the highest rates  
391 of violated MRLs were India (18.1%), Kenya (11.4%), Brazil (7.8%), Egypt (5.1%), Chile  
392 (3.2%), the United States (2.0%), Israel (1.6%), Spain (1.4%), Italy (1.3%), France (1.1%)  
393 and South Africa (1.1%).

394

395 Second, despite a small number of analysed samples, the following countries  
396 exceeded MRLs at very high percentages: Ukraine (MRLs violation was 50% in 6  
397 samples), Romania (MRLs violation was 20% in 10 samples), Cambodia (MRLs  
398 violation was 12.5% in 8 samples), Iran (MRLs violation was 25% in 8 samples),  
399 Lebanon (MRLs violation was 20% in 5 samples), Saudi Arabia (MRLs violation was  
400 50% in 2 samples) and Tunisia (MRLs violation was 11.1% in 9 samples).

401

402 Third, MRL violations for samples imported from EU countries were remarkable  
403 because high residue rates were determined in food samples imported from certain EU  
404 countries. For example, Spain had a large number of samples with detectable residues  
405 (56.2%) and above MRLs (1.4%) especially in fruits and vegetables. In samples imported  
406 from Cyprus, rate of detectable residues was 66.0% and MRLs violation rate was 9.4%.  
407 France had samples containing measurable residues at 43.6% and breaching MRLs at  
408 1.1%. Samples from Poland were also found to have serious residue rates (detectable  
409 36.8%; MRL violation 4.8%). Another example of high residue levels was Italian samples  
410 with 37.3% for detectable residues and 1.3% for exceeding MRLs. Samples from Greece,  
411 the Netherlands, Germany, Ireland and Bulgaria had detectable residue rates at 52.8%,

412 46.0%, 19.1%,17.4% and 21.7%, and violating MRLs rates at 0.9%, 0.7%, 1.3%,0.8%  
413 and 4.3% respectively.

414

415 Fourth, high residue rates in foods imported from developed countries were of  
416 great concerns. There is a common belief that food commodities of developed countries  
417 are not alarming in terms of pesticide residues (Galt, 2010) but this study found  
418 contradictory results. For example, detectable residues (36.3%) and MRLs violation  
419 (5.3%) were determined in 171 Canadian samples analysed. The United States had  
420 samples with detectable residues (46.1%) and with residues above MRLs (2.0%), as well.  
421 Foods imported from Norway did not violate MRLs but residues were detected in 46.1%  
422 of the 152 samples. On the other hand, none of the samples analysed from the products  
423 of Finland, Iceland and Sweden had MRL violations.

424

425 Fifth, the highest non-compliance rates were determined in foods imported from  
426 outside European countries. Samples from Bangladesh had the most samples with  
427 residues above MRLs (50.0%) and with detectable residues (64.6%). Samples from  
428 Cameroon had residues in 29 of 32 samples (90.6%) and samples from Uruguay had  
429 residues in 48 of 56 samples (85.7%), but no MRL violations were found in any of their  
430 samples. Seven countries with the highest level of MRLs violations were Malaysia  
431 (38.8%), Jordan (20.8%), Jamaica (18.6%), Pakistan (12.2%), Ghana (11.4%), Thailand  
432 (11.5%) and Colombia (10.0%). Moreover, food samples from Dominican Republic  
433 (8.7%), Venezuela (9.1%), Serbia (3.7%), Uganda (4.3%), Puerto Rico (4.8%), Costa  
434 Rica (3.2%), and Turkey (3.6%) had residues above MRLs. Windward Islands (detectable  
435 75.8%; MRLs exceedance 6.1%) and Namibia (detectable 75.0%; MRLs exceedance  
436 4.2%) had also other highest non-compliant rates. However, 41 samples from Indonesia  
437 were analysed and no residue was found in all samples.

438

439 The results mentioned above were comparable with EU-coordinated control  
440 programme (EUCP), which was conducted with the same scheme across Europe, and can  
441 be concluded to be within the range of those found for residue results here within. EFSA  
442 (2013) reported in the 2010 EUCP that foods imported from outside European countries  
443 (7.9%) had a higher average rate of MRLs violations than foods from EU countries  
444 (1.5%). Similarly, according to 2016 EUCP results, foods of European origin were found

445 to have less measurable residue rates (43.9%) and less MRL violations (2.4%), compared  
446 to foods from outside European countries (measurable 52.1%; MRL violation 7.2%)  
447 (EFSA, 2018a). In this study, average MRL exceedance rate was found to be relatively  
448 lower but closer to 5.6% for samples from outside European countries and 1.2% for  
449 samples from EU countries.

450

451 Among the European countries, the highest rate of MRLs violations were found  
452 for samples from Slovenia, Portugal, Cyprus and Slovakia in the 2010 EUCP (more than  
453 3%) (EFSA, 2013) as well as for samples from Poland, France, Norway, Cyprus and  
454 Iceland in the 2016 EUCP (above 4%) (EFSA, 2018a). In this study, the highest MRLs  
455 violation rates for EEA countries were found in samples from Cyprus (9.4%), Poland  
456 (4.8%), Spain (1.4%), Italy (1.3%) and France (1.1). Among the outside European  
457 countries, the highest rate of MRL violations were found for samples from Mauritius  
458 (20.0%), Thailand (20.9%), Iran (21.4%), Jordan (21.7%), Burundi (22.2%), Uganda  
459 (23.6%), India (28.3%), Bolivia (33.3%), Bangladesh (44.4%), Cambodia (50.0%) in  
460 2010 EUCP (EFSA, 2013). Similar results were also found for outside European countries  
461 in 2016 EUCP and accordingly, samples from India, Brazil, Kenya, Tunisia, Dominican  
462 Republic, Egypt, Colombia and Israel had the highest MRLs breaches rates (7.2%) and  
463 other countries with the high non-compliance rates were Suriname, Cambodia, Pakistan,  
464 Thailand, Sri Lanka, Uganda, China, Vietnam and Laos (EFSA, 2018a).

465

466 In addition to the EUCP results, two Nordic project studies can be compared with  
467 the results of this study since the monitoring programmes were carried out under the same  
468 law in all European countries. Hjorth et al. (2011) examined the pesticide residues in  
469 fruits and vegetables exported from South American countries including Uruguay,  
470 Suriname, Peru, Ecuador, Columbia, Chile, Brazil and Argentina to Nordic countries such  
471 as Sweden, Finland, Estonia, Denmark and Norway and concluded that 72% of the  
472 samples analysed had detectable residues and more than 8% of them exceeded MRLs.  
473 Hjorth et al. (2011) have also found that foods from Brazil (13%), Uruguay and Columbia  
474 (both 10%) were the samples with the highest MRLs violations. Similarly, as in another  
475 Nordic project, Skretteberg et al. (2015) analysed the Southeast Asian fruits and  
476 vegetables imported to Sweden, Norway, Finland, Denmark to examine the adherence to  
477 EU MRLs and legislation but reported the requirement for effective and continuous

478 monitoring of foods from Southeast Asia due to high rates of samples containing  
479 detectable residues (28%) and breaching EU MRLs (12%). Skretteberg et al. (2015) have  
480 also concluded that Vietnam (33%), Malaysia (11%) and Thailand (9%) had the highest  
481 samples exceeding MRLs.

482

483 We found similar results with both EUCP and Nordic Project results for these  
484 same outside European countries. Bangladesh (50.0%), Malaysia (38.8%), Burma  
485 (7.7%), Cambodia 12.5%), Colombia (10.0%), Ghana (11.4%), India (18.1%), Jamaica  
486 (18.6%), Jordan (20.8%), Kenya (11.4%), Pakistan (12.2%) and Thailand (11.5%) had  
487 the highest MRLs exceeding samples. The highest detectable residue rates were found  
488 from Belize (100%), Bolivia (95%), Cameroon (90.6%), Uruguay (85.7%), Bangladesh  
489 (64.6%), Brazil (68.3%), Chile (77%), Costa Rica (76.4%), Dominican Republic (54.7%),  
490 Guatemala (62.5%), India (55.1%), Namibia (75.0%), South Africa (74.8%) and  
491 Windward Islands (75.8%). About half of the food samples had detectable residues in  
492 Argentina (53.7%), Colombia (58.9%), Egypt (51.3%), Honduras (43.7%), Jordan  
493 (50.2%), Kenya (45.7%), Malaysia (45.9%), Morocco (59.6%), Turkey (55.6%) and the  
494 United States (46.1%).

495

496 All of these results revealed the high incidences of pesticide residues in imported  
497 foods consumed in the UK. Regulation 669/2009 was thus adopted for certain countries  
498 outside European to perform import controls for specific pesticide residues in their  
499 specific foods (EFSA, 2018a). Although this law has been implemented and regularly  
500 modified since 2010 (Fussell, 2016), this study demonstrated that the high levels of  
501 pesticide residues in foods imported from non-European countries still continue to exist.

502

### 503 **3.3.Problematic pesticides**

504

505 Over the 21 years from 2000 to 2020, there were in total 141 different active  
506 substances that were quantified with above MRLs (Supplemental Table S3), the most  
507 occurrence of active substance in violation of MRLs was dimethoate followed by  
508 dithiocarbamates and carbendazim, 98 different products were analysed with active  
509 substance(s) above MRLs (Supplemental Table S4), the product with the most frequent

510 violation of MRLs was beans followed by okra and grapes, and 64 countries that exported  
511 foods with active substance(s) above MRLs.

512

513         There were not any trends in the kinds of active substances that were above MRLs  
514 through time. However, the products with above MRLs were mostly grocery vegetables  
515 and fresh fruits (Supplemental Table S4). In particular, beans, okra, grapes and yam had  
516 the highest violating MRLs rates at 26.6%, 13.7%, 6.9%, 5.2%, respectively. Beans were  
517 mainly imported from Kenya, Thailand, Egypt, Spain, Cyprus, Bangladesh, China, India,  
518 Dominican Republic and Malaysia. Okra was mostly imported from India, Jordan,  
519 Colombia, Dominican Republic, Spain and Cyprus. Grapes were mainly imported from  
520 Chile, Greece, India, Egypt, Spain, Turkey, USA and Brazil. Yam was mostly imported  
521 from Brazil, Ghana, Jamaica, South Africa, China and Jordan. EFSA (2021) reported in  
522 the 2019 EUCP that fresh vegetables and fruits (beans, peppers, teas, vine leaves, herbs,  
523 celery leaves, water cresses, dragon fruit, prickly pears, passion fruits, pomegranates) had  
524 the highest MRL exceedance rates.

525

526         Although it was the product group with the lowest violation rate (0.7% in Table  
527 1), pesticides which were banned years ago such as organochlorine pesticides were  
528 detected in animal foods. It is not surprising that residues of these pesticides were found  
529 in animal products, as DDT and its metabolites have a high potential to bioaccumulate in  
530 foods high in fat and have a long-term persistence in the environment, resulting in  
531 exposure of animal foods. For example, low levels of DDT were detected in oily fish  
532 (samples imported from Ireland, Norway, Peru, and Portugal), salmon (imported from  
533 USA, Ireland and France), lamb's liver, lamb's mince, venison and butter (imported from  
534 New Zealand). Moreover, DDT and other organochlorine pesticides were detected in sea  
535 fish farming at the Pacific and South West Atlantic. All these findings prove that these  
536 pesticides still exist in aquatic and terrestrial ecosystems and continue to exist in the food  
537 chain. However, it has been emphasized in the annual reports of UK monitoring  
538 programme that these banned pesticides were at low levels and did not pose any risk to  
539 human health. It has been found the similar results with the EUCP that banned pesticides,  
540 DDT, were detected in fish and in animal foods (EFSA, 2021).

541         Dimethoate, dithiocarbamates, carbendazim, metomyl, and chlorpyrifos in  
542 imported foods from 2000 to 2020 were the most common types of violating active

543 substances, with the highest MRLs exceedance rates of 8.24%, 7.66%, 6.44%, 3.35% and  
544 3.15%, respectively. Poulsen et al. (2017) stated in their research that active substances  
545 that violate MRLs most frequently were dithiocarbamates and carbendazim. Other  
546 pesticides with high MRLs exceedance rates were omethoat (2.77%), acephate (2.7%),  
547 profenofos (2.7%), and BAC (2.64%).

548

### 549 **3.4.GIS maps**

550

551 To visualise differences between countries which exported foods to UK from 2000  
552 to 2020, analysed and processed data were integrated into QGIS software and three  
553 different maps were created. Figure 4 shows the distribution of total number of samples  
554 analysed for pesticide residues in imported foods for each country. Figure 5 shows the  
555 distribution of analysed samples for each country according to the percentages of food  
556 samples with detectable residues. Figure 6 shows the distribution of analysed samples for  
557 each country according to the percentages of food samples with residues above MRLs.

558

559 These maps showed that the proportion of foods with residues greatly varied with  
560 country. Although the fluctuation might result from several factors mentioned above,  
561 such as sample numbers and types of foods analysed, sampling and analysis methods  
562 used, and even analytical instruments development by technological improvements,  
563 imported foods could be a major factor responsible for the variation from country to  
564 country (FSA, 2006).

565

566 Pesticides, pesticide regulations or authorizations and pest problems differed in  
567 each exporting country because of different environmental conditions and types of  
568 products (Galt, 2009). Environmental conditions, such as warm and humid climates,  
569 provide more favourable environments for different weeds, diseases and pests (Fussell,  
570 2016). Countries with conducive environmental conditions tend to apply more pesticides  
571 to protect their products from intense diseases and pests, and thus pesticides and  
572 regulatory regimes vary appreciably from country to country (Hjorth et al., 2011).  
573 Additionally, chemicals show different degradation in different foods and environmental  
574 conditions (Galt, 2010). Levels of pesticide residues are influenced by the intensive use

575 of pesticides, applying different active substances and degradation rates of pesticides,  
576 resulting in residue differences between countries (Vannoort, 2001).

577

578 Product types, such as processed and unprocessed foods, cause significant  
579 differences in residue levels because pesticide residues in foods are reduced and removed  
580 during commercial processing of foods, including preparation, transport and storage and  
581 post-harvest treatments (FSAI, 2009). Several studies (Al-Taher et al., 2013; Bajwa &  
582 Sandhu, 2014; HSE, 2015) have reported that foods are exposed to many stages from raw  
583 material to final product and this leads to a reduction in levels of pesticide residues.  
584 Preparation stages (e.g. trimming and peeling), which directly move away pesticide  
585 residues in shell and surface of foods; thermal processing stages (e.g. scrambling,  
586 canning, steaming, cooking, boiling, blanching and pasteurization), which are effective  
587 in degradation of chemicals and in lowering of residue levels; and other stages (e.g.  
588 brewing, malting, curing, wine making, baking, milling, fermentation and refining),  
589 which result in reduction of residue levels in final products. However, later processing  
590 stages like concentration and dehydration or drying, lead to an increase in concentration  
591 of residues and hence increase in residue levels (HSE, 2015).

592

593 For these reasons, levels of pesticide residues vary between processed foods and  
594 unprocessed raw agricultural products. EFSA (2018a) reported that in 2016 EUCP,  
595 unprocessed foods had more detectable residues (47.9%) than processed products  
596 (33.4%) and had more MRL violations (3.9%) than processed foods (2.8%). It was also  
597 calculated in 2006 EUCP that, about 3% of fresh produce had samples with residues  
598 above MRLs while MRLs exceedances was not found in processed foods (FSAI, 2009).  
599 Moreover, there are also residue differences between food of origin (e.g. cereals, fruits  
600 and vegetables) and animal foods. EFSA (2018b) reported by 2013, 2014 and 2015 EUCP  
601 that plant-based foods had a higher rate of samples with measurable residues and above  
602 MRLs than animal foods. Our results were consistent with these studies that fruits and  
603 vegetables and cereals had a higher occurrence of quantified residues (59.8% and 34.2%)  
604 as well as higher MRLs violation rate (4.0% and 2.1%), compared to animal products  
605 (14.0% and 0.7%) (Table 1). Given that countries exported different foodstuffs, it was  
606 expected that there were differences between the residue levels of exporting countries.

607           There are different MRLs being set throughout world and countries regulate  
608 pesticide residues according to their national MRLs (e.g. EPA tolerances used in the  
609 USA; EU MRLs used in EU countries; Canadian MRLs) or according to Codex MRLs  
610 employed in many countries, which result in creation of dissimilar pesticide / commodity  
611 MRLs combinations. Thus, MRLs differences in imported produce will affect residue  
612 assessment results (Winter & Jara, 2015).

613

614           Most developing countries may be less aware of the importance of pesticide  
615 residues in foods and do not have monitoring programmes or may not effectively  
616 administer them due to deficiency of the strict enforcement of regulations and enough  
617 infrastructure (Hjorth et al., 2011; Kolani et al., 2016; Mutengwe et al., 2016). Since the  
618 Circle of Poison, published by Weir and Schapiro in 1981, specified that developed  
619 countries are at risk with pesticide residues prohibited or restricted on imported foods,  
620 imported foods have been of great concern (Galt, 2009). Similarly, Ecobichon (2001) has  
621 asserted that developing countries intensively use inexpensive, more toxic and non-  
622 authorized pesticides without the concern of their pesticide residues in local foods and  
623 even in foods they export. While farmers and growers of developing countries use  
624 chemicals that are relatively more effective and cheaper in combating pests due to  
625 economic concerns, biological control and integrated pest management are widely  
626 applied in many developed countries (Ferro et al., 2015; Fussell, 2016; Poulsen et al,  
627 2017). These methods lead to less use of pesticides and thus reduced levels of residues,  
628 but many developing countries are even lack of Good Agricultural Practice (GAP)  
629 (Ecobichon, 2001). Samples from developing countries which applied pesticides “that are  
630 approved or no longer approved in the EU on crops for which no import tolerances have  
631 been requested by the importers” (EFSA, 2018a, p.80). For these reasons, given the  
632 increasing trade in food commodities, governments have set and imposed obligatory  
633 regulations and legislation to reduce consumer concerns for imported foods as well as  
634 particularly monitored imported foods through their pesticide residue monitoring  
635 programmes (Wilson & Otsuki, 2004).

636

#### 637           **4. Conclusions**

638

639 33,911 sample residues records from UK monitoring programme in 2000-2020  
640 were analysed to reveal changes in the frequency of detectable pesticide residues and  
641 breaching MLRs in foods imported into the UK. Imported foods with both detectable  
642 pesticide residues and MRLs breaches increased through time and this increased trend  
643 was statistically significant. Several factors, such as structure of the monitoring  
644 programme, introduction of new pesticide patterns and changes in MRLs and MRL-  
645 defined foods, were jointly responsible for this trend. However, among the main factors  
646 were likely to be regulations and legal frameworks that have been constantly amended  
647 and changed. The proportion of imported foods with residues or the amounts of residues  
648 in imported foods were found to vary with year and between countries because of  
649 differences in production conditions, product types and MRLs. Thanks to the monitoring  
650 programmes, active substances exceeding MRLs and banned pesticides have been  
651 detected and monitored. GIS application was found to be a useful tool to display the  
652 differences in pesticide residues among exporting countries.

653

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804

### 805 **Table and Figure Captions**

806

807 Table 1. The total number of samples in imported foods analysed for pesticide residues,  
808 the number of samples with detectable residues, the number of samples with residues  
809 above maximum residue levels (MRLs), samples with detectable residue calculated as a  
810 percentage of total analysed samples and samples exceeding MRLs calculated as a  
811 percentage of total analysed samples in food product groups during the period in 2000-  
812 2020.

813

814 Figure 1. Trends in the total number of samples analysed for imported foods to the UK  
815 from 2000 to 2020. The dotted line is the fitted regression line to the data without 2000  
816 and 2020. The fitted equation is  $y=14325.0 -6.286*x$  with the coefficient of determination  
817 ( $R^2$ ) of 0.058 which measured the proportion of variance accounted for by the year and  
818 was not statistically significant ( $p>0.31$ ).

819

820 Figure 2. Trends in the percentage of total samples with detectable residues in imported  
821 foods to the UK. The dotted line is the fitted regression line to the data without 2020. The  
822 fitted equation is  $y=-2368.0 + 1.2034*x$  with the coefficient of determination ( $R^2$ ) of  
823 0.6175 which measured the proportion of variance accounted for by the year and was  
824 statistically significant ( $p<0.01$ ).

825

826 Figure 3. Trends in the percentage of total samples with residues above MRLs in imported  
827 foods to the UK. The dotted line is the fitted regression line to the data without 2020. The  
828 fitted equation is  $y=-363.5 + 0.1825*x$  with the coefficient of determination ( $R^2$ ) of  
829 0.6547 which measured the proportion of variance accounted for by the year and was  
830 statistically significant ( $p<0.01$ ).

831

832 Figure 4. Global map showing total number of samples analysed out of the total samples  
833 in imported foods to the UK from each country in the period of 2000-2020. Country  
834 outlines © 2018 GADM.

835

836 Figure 5. Global map showing percentage of samples with detectable residues out of the  
837 total samples in imported foods to the UK from each country in the period of 2000-  
838 2020. Country outlines © 2018 GADM.

839

840 Figure 6. Global map showing percentage of samples exceeding maximum residue levels  
841 (MRLs) out of the total samples in imported foods to the UK from each country in the  
842 period of 2000-2020. Country outlines © 2018 GADM.