

INTERGOVERNMENTAL GROUP ON TEA
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Working Group on Maximum Residue Levels1

# Communications outline

**Keeping tea compliant**

This communications outline is based upon the successful approach utilized by the Tea Association of Canada.

# The approach

**Transparency and consistency**

Fundamental to effective communications are transparency and consistency. Adherence to transparency and consistence in messaging builds trust and reinforces your credibility among and around those with which you are looking to establish rapport and from whom you are seeking assistance.

Consistency means one story being delivered repeatedly, no surprises for those who have already heard the message and are hearing it again from you or from another source.

Transparency means no hidden agendas or undisclosed elements of your process or next steps. By sharing with others who you have met or communicated with and who you are next planning to approach avoids the creation of suspicion and frequently fosters advice, helpful insights as well as often some useful introductions.

# The stakeholders

**Identification of key contacts**

The identification of key contacts is critical to successful messaging and the establishment of ongoing constructive dialogue.

**Governments**

Governments do not like surprises and frequently react strongly and quickly in unexpected situations.

Political contact can be helpful later on in some situations, but should not be the starting point for contact with the government. Typically a politician will ask who you have already met within the bureaucracy of the responsible government department, and in the event that you have not made any contact, will direct you to do so.

**Regulators**

Regulators are the legal gatekeepers. They enforce the law and know what, if any, parameters exist for discretion within the law and are also the ones who decide if any discretion might be offered.

Respect the regulator despite how much you may not like the rules. Regulators cannot show favouritism. Attempts to make a regulator “a friend” creates a very awkward situation for the regulator and could easily result with you not developing the rapport that you will need for finding the way forward with the regulator.

Resist confrontational outbursts or making threats, as doing so will erase any potential for developing the desired respectful rapport.

Present your message and explain your situation to the most senior official in the area responsibility which has authority over the area relevant to the specific regulatory issue. (i.e. MRLs) Let the senior official direct you to the working level officials that you should be dealing with. Work with the working level official while continuing to keep the most senior official apprised and updated.

Building respect and rapport is a two way relationship. While you are seeking a regulatory resolution from the regulator, whenever possible bring the official information that might be of value to the regulator, such as a report from a meeting or international event that the regulator might have been able to attend but could be interested in or where relevant information to your issue may have arisen. Keep the regulator in the loop and reinforce the fact that you are active in regulatory spheres beyond the regulator’s domestic responsibilities

**Tea officials**

While not directly responsible for regulatory matters, trade officials are always sensitive to potential trade disputes and trade irritants.

Trade officials frequently work in between regulatory law and the political priorities of government. The rise in global economic influence of tea producing counties such as India and China is not lost upon trade officials as governments around the world seek to position themselves favourably with such rising economic stars.

Similarly, the economic attraction and trade potential of tea consuming nations scores high among the broader trade priorities of many tea producing countries with diversified economies, where tea has often been the lead commodity upon which traditional trade relations had been originally established, hence tea is viewed as a catalyst for the development of further trade.

Trade officials frequently lever moral suasion within governments to find the win-win circumstances which permit trade relations to blossom

**Global regulatory authorities**

Global regulatory forums provide a broader context for discussion and consideration of issues while also affording an excellent opportunity for creating awareness, the communication of messages and networking.

Industry initiated side bar meetings held at the time and location of the meetings of global regulatory authorities capitalize upon the presence of regulators from around the world and provide an excellent opportunity for efficient communication of messages, immediate discussion and feedback among multiple regulators, while not requiring

The Tea Association of Canada has participated and continues to participate in and/or at meetings of the following global regulatory authorities:

* FAO IGG on Tea
* OECD
* CODEX

**Tea industry**

* Importers
* Packers
* Tea boards
* Tea research institutes
* Plantation owners

Those whose businesses rely upon the ongoing compliance of tea must be kept apprised of regulatory activities and be encouraged to accept their respective responsibilities in implementing required changes to maintain compliance by steadfastly reinforcing the industry’s messages within their value chain and among their tea suppliers regarding what is acceptable in tea consuming countries.

The transfer of compliance information is vital. Importers and packers must relay information to tea boards and plantation owners regarding what is required to continue to have access to tea consuming countries.

Tea Research Institutes which utilize GLP standards and methodology can be of great assistance to crop protection companies, by providing a facility for the generation of the field data necessary to support the establishment of MRLs for tea.

**Crop protection industry**

**Chemical Companies**

Crop protection companies in consuming countries are frequently unaware of compliance challenges faced by the tea industry and have limited latitude for mitigating the situation given their domestic focus.

Due to climatic circumstances, few crop protection compounds used on tea are compounds marketed in western tea consuming countries, therefore chemical companies in tea consuming countries have little economic incentive to invest significant time in matters related to MRLs for tea.

There is a move a foot among a number of crop protection companies to undertake global approaches on their compounds to avoid the prevailing and problematic patch work situation regarding the registration of the compounds and the related import tolerances. The tea industry has benefited from such global initiatives by some crop protection companies and it is anticipated that increasingly the crop protection industry as a whole will begin to embrace similar global approaches.

The chemical companies in tea producing countries are critical to the transition towards the ongoing compliance of tea. The changing of tea production practices to those which utilize crop production compounds that are compliant with the regulations of tea consuming countries is a long term process. The encouragement of making the transition and the benefits of doing so is best explained and demonstrated to tea growers by the chemical company representatives located in tea producing countries.

**CropLife**

CropLife is the trade association for the crop protection industry. CropLife International, based in Brussels, is the overarching global association to which all the regional and country based CropLife affiliates report.

CropLife provides an excellent and efficient venue for communication of the tea compliance issues because CropLife’s membership includes the critical mass of crop protection companies globally.

In tea producing countries, CropLife is the central point for messaging to chemical companies who are active in a country.

**Certification**

Certification bodies work both with packers and growers, they can help us explained and communicate the issues that can occur from the packers point of view, they can also understand the difficulty and help in the training of growers, especially small tea holders.

# The timing

**Sequence of contact**

There is a logical progression to making contact with stakeholders which is based upon the concept of cumulative information which then reinforces consistency and transparency.

**Government – Domestic regulators** are the starting point. Gain an understanding of what is needed to maintain compliance and what suggestions the regulator has with regard to achieving the desired compliance level. . Communicate to the regulator the tea industry’s desire to maintain compliance and ask what can be done to assist the regulator as the tea industry endeavours to make the transition towards ongoing compliance.

**Tea Industry – Domestic packers and importers** must be apprised of the discussions with the domestic regulators and agree to be consistent in their messaging with the messages delivered to the domestic regulators. Any departure from message by the domestic tea industry will undermine credibility with the government and other stakeholders.

Domestic packers and importers must advise their contacts in tea producing countries (tea boards and tea plantations) of the need to maintain compliance in tea consuming countries.

**Government – Trade officials** needto be advised that the teaindustryis working to ensure ongoing compliance. Such information will be appreciated as a “heads up” so that trade officials be aware of such information as trade discussions evolve.

It is helpful, but not mandatory if **global regulatory authorities** approached when a domestic regulator familiar with the tea industry message is also present, as this reinforces the message and the tea industry’s commitment to act to the domestic regulator while also impressing the global regulatory authority that the tea industry had dome its “homework” with the domestic regulators.

**Chemical companies** aremost receptive after initiatives have been taken among the regulators both domestic and global, as such provides comfort that the tea industry has some degree of understanding about the highly regulated environment in which crop protection companies operate.

**CropLife** is inclined to be receptive and assist once there is evidence that its member companies have been informed by the tea industry and therefore then industry wide involvement is justifiable.

While participation by CropLife in global or domestic regulatory forums is not typically a regular occurrence, when CropLife is present at such gatherings its presence is duly noted by regulators and it enhances “bench strength” on an issue such as with tea.