CHAPTER 3.1 AGRI BUSINESS AND FOOD SAFETY

3.1.1 Overview

Vietnam is the largest black pepper and cashew producer and exporter in the world, and ranks in the top five for the export of rice, tea and coffee. Fish and seafood are also important export products. Agriculture uses 80% of the natural land area, feeds 67% of the people living in rural areas, and employs 48.4% of the labour force. In 2013, the estimated contribution of agriculture to the Gross Domestic Product (GDP) was 19.3%. In the first ten months of 2014, the export value of the sector is estimated to be 11.2% year-on-year. Nevertheless, Vietnam still imports more agricultural products, food and raw materials than it exports.

The agricultural sector is a vulnerable sector though, as climate change and the economic situation have an impact on its output. A study by the Institute of Policy and Strategy in Agriculture and Rural Development and Oxfam shows that the risk ratio for farmers is 70-80% with a profitability ratio of just 20%. Dependence on weather conditions and fluctuating prices limit the possibility to increase the export volume of various products. At present, Vietnamese products are competitive on price but not on quality, and there is a need, and a possibility, for improvement. Focusing on market and consumer needs rather than just production would in our view open up many opportunities. We believe that the agri and aqua business sector can grow, and export more and different products in a sustainable way.

This objective can be achieved in various ways. One way is to shift from exporting mainly commodities and low-end mass products to exporting high-quality end manufactured products. This will allow Vietnam to enter new markets and earn more. A second possibility is to commercialise rest products. Yet another way is to diversify the range of export products, which could be extended to fruits and vegetables. However, some issues need to be addressed to allow this. Government support for these products is needed in the same way as for the other products. Furthermore, investments are needed for the education of farmers, the production and the post-harvest phases, as well as the processing and preserving sectors. It is also important that farmers and producers are instructed about food safety and hygiene standards. To ensure food safety, it is important that farmers use chemical inputs according to Good Agricultural Practices (GAP) and label recommendation. Only by doing so can maximum residue levels (MRL) be ensured, which in return will protect consumers and ensure export possibilities for producers. We also believe it is necessary to introduce a high logistic level and innovative management scheme. In short, a strategy is needed to upgrade and modernise the value chain, which will improve efficiency, competitiveness, sustainability, product quality and meet consumer demand.

1 Available at asiacommodities.com.vn/en/new/s/3439/vietnam-s-key-agricultural-commodities-sept-2013
3 Available at www.cia.gov/library/publications/the-world-factbook/geos/vm.html
4 Available at bizhub.vn/news/8282/agroforestry-seafood-exports-bring-in-228b.html
5 Available at trade.ec.europa.eu/doclib/docs/2006/september/tradoc_111584.pdf
6 See note 2
7 Available at vccinews.com/news_detail.asp?news_id=30288
8 Available at vccinews.com/news_detail.asp?news_id=30497 and vietnamnew s.vn/economy/258396/coffee-exports-show-big-potential.html
9 Available at vietnamnew s.vn/economy/255018/high-tech-agriculture-needs-funding.html
10 These constraints are described in the Vietnam country paper for the FFTC-NACF International Seminar on Threats and Opportunities of the Free Trade Agreements in the Asian Region, held in Korea on 11-15 September 2013. See ap.fftc.agnet.org/ap_db.php?id=106&print=1
11 Please note that we mention a few of the constraints.
12 See note 11 and en.vietnamplus.vn/Home/Modernising-agriculture-opportunities-and-solutions/2014/5/3514.vnplus
CHAPTER 3.1 SECTORAL ISSUES/AGRI BUSINESS AND FOOD SAFETY

Once a strategy is developed, it needs to be funded and implemented. In recent years, investment in agriculture has not been in line with the contribution agriculture made to the GDP. For example, in 2012, agriculture represented about 19.7% of GDP, while only 5% of the Government’s total investment was dedicated to the sector. We fully support the view presented in the Vietnam country paper for the Food and Fertiliser Technology Centre-National Agricultural Cooperative Federation (FFTC-NACF) seminar that investments in agriculture are important to ensure food security and a sustainable agricultural development in Vietnam. Even if the level of investment by the Government is insufficient, it is still possible to modernise and upgrade the sector through Foreign Direct Investment (FDI) and Private-Public Partnerships (PPP). PPP is another way to attract more investment into the agriculture sector. This point is developed in paragraph 6 hereafter. Noteworthy are also the initiatives of banks to support financing the introduction of hi-tech agriculture in Vietnam.

For the first nine months of 2014 the sector has received 1.4%. To attract more FDI there are several challenges that need to be overcomed, such as creating clear and transparent trade policies and administrative procedures, equal access for small and large-scale farms and enterprises, shortage of high-skilled labour resources in the agricultural sector, and finally creating a competitive tax system. We are pleased with the view of President Truong Tan Sang that some regions should try to attract FDI and use hi-tech farming techniques to develop the sector, and that some provinces, such as Dong Thap, Lam Dong and Son La, have already achieved that objective.

It is clear that there are great but yet to be explored possibilities to develop the sector, and that there are ways to achieve this objective. However, we believe that several issues need to be solved to fully use this potential. Food safety remains a problem in Vietnam, even though welcome efforts have been made by the Government. We would like to reaffirm the importance of this issue and our commitment in supporting the Government in its efforts to tackle it.

This chapter reflects the views of two EuroCham Sector Committees: Food, Agri and Aqua (FAASC), and CropLife Vietnam, as they are both active in the agri business and food safety sector.

### 3.1.2 Food Safety Agency

**Relevant Ministries:** Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

**Issue description**

In the period 2011-2013, the number of food poisoning related incidents decreased. For 2014, the number of death has arrived at 16 and almost 2,000 people were affected, which in itself does not differ from other countries. We have seen results of efforts conducted by the Government to improve

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13 See note 9.
14 See note 11.
16 Available at bizhub.vn/banking/6726/agribank-finances-credit-programme-for-hi-tech-agriculture.html
17 Available at vietnamnews.vn/economy/261099/foreign-investors-show-declining-interest-in-agriculture-sector.html
18 Available at ap.fftc.agnet.org/ap_db.php?id=106&print=1
19 Available at vietnamnews.vn/economy/259307/bac-giang-told-to-attract-fdi-to-agriculture-sector.html
food safety. Nevertheless, unsafe food is still a major public health issue in Vietnam, like in other developing countries, not because of food poisoning, but because of hidden food safety issues caused by the use of forbidden products like hormones, antibiotics, pesticides, etc. A chain approach is needed to analyse where the food safety issues occur and how they can be best prevented, as food safety issues can happen in the whole value and supply chain. However, it is necessary to find a balance between providing safe food to the population and the costs to achieve that objective.

In 2013 and 2014, several regulations have entered into force. In particular, Joint Circular 13/2014/TTLT-BYT-BNNPTNT-BCT (Joint Circular 13) is a significant step forward as it intends to avoid overlapping in food management by the various Ministries, but still this does not eliminate potential confusions. For instance, if a vitamin additive is added to milk, this product will fall under a different Ministry’s competence than just milk, which makes it complicated for the producer. More generally we believe clarification is needed. Even though it is too early to fully assess the impact of Joint Circular 13, the issue remains that multiple parties remain involved in the decision-making process with regard to food safety. In our view, this will not be as efficient and effective as having only one responsible entity. Improving the quality and safety of the products will increase the possibilities of exporting these products, as many importing countries have higher applicable standards. It is clear that current food safety standards applicable in Vietnam limit possibilities for export. This is confirmed by the recent warning of the European Union Consumer Protection Agency (EU CPA) that it will ban imports of certain vegetables if food safety issues are not addressed.

In November 2013, the FAASC co-organised an event with the Dutch embassy on food safety. This event was attended by a great number of Vietnamese Government officials, as well as the Vice-Minister of the Ministry of Agricultural and Rural Development. In October this year, another event on agriculture took place with a focus on food safety, organised by the FAASC together with EuroCham and the EU-Vietnam Business Network. In the past few months, the FAASC has met with several Government officials, like the Minister of Agriculture and Rural Development and the Deputy General Director of the Vietnam Food Administration (VFA), to talk about various issues related to the development of the sector and food safety. We are very pleased with this cooperation. We would like to suggest establishing a working group consisting of representatives of the relevant Ministries and agencies, and representatives of the industry to discuss how food safety can be dealt with efficiently and effectively based on Joint Circular 13. In this context, we would like to be supportive to discussions on the creation of a centralised Food Safety Agency (FSA). The recommendations hereafter provide an overview of what we believe should be the tasks and competences of the FSA.

Food safety issues are often not limited to Vietnam; therefore it is important to continue working together with neighbouring countries within the existing ASEAN group for Cooperation in Food,

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26 For example: Decree 178/2013/ND-CP dated 14 November 2013 on sanctions of administrative violations on food safety, Decree 119/2013/ND-CP dated 9 October 2013 on sanctioning of administrative violations in the domains of veterinary medicine, livestock breeds, and livestock feeds (Decree 119) and Joint Circular 13/2014/TTLT-BYT-BNNPTNT-BCT dated 9 April 2014 on allocation of tasks and cooperation among regulatory agencies in food safety.
27 Ibid.
28 Available at www.fao.org/docrep/007/y5488e/y5488e09.htm
30 Available at www.thenhiennews.com/business/eu-issues-stem-warning-to-vietnams-veggie-exporters-32164.html
31 Available at www.eurochamvn.org/node/12775
32 Available at www.eurochamvn.org/node/13578 and www.eurochamvn.org/node/13671
Agriculture and Forestry, as several policies and action programs as well as a website have already been developed.  

**Potential gains/concerns for Vietnam**

After Joint Circular 13 is clarified we believe it will improve efficiency, reduce costs for companies, improve (international) competitiveness and reduce health risks.

We believe the creation of an FSA would also improve and boost the reputation of Vietnamese products for consumption in Vietnam. A strong FSA under one responsible Ministry will reduce the likelihood of products being rejected if they do not meet the standards set and allow companies to approach new markets. Although the vast majority of companies are eager to meet the standards, a few cases might still affect all companies. Effective and efficient food safety management and enforcement will not only reduce costs for companies that export, but also those targeting the local market. In short, an FSA will improve the competitiveness of the sector.

**Recommendations**

- Clarify the scope of Joint Circular 13, in particular as regards competence and responsibility sharing.
- Establish a working group consisting of representatives of relevant ministries/agencies, the FAASC and other organisations active in the food, agri and aqua business.
- Amend the Law on Food Safety No. 55/2010/QH12 dated 17 June 2010 and create a Food Safety Agency under the responsibility of one Ministry by the end of 2015.
- Incorporate existing structures in order not to lose existing knowledge and experience.
- Continue to cooperate with the EU, as well as with neighbouring countries to address cross-border food safety issues within the existing ASEAN group for Cooperation in Food, Agriculture and Forestry.
- A Food Safety Agency could deal with the following:
  - Import, export and transhipment of food requirements related to inspection, certification and control;
  - Food testing and certification;
  - Food labelling and advertisement;
  - Report on food alerts related to the food supply chain including pesticide, fertiliser, feed, etc.
  - License and register food traders and establishments, food processors and food warehouse;
  - Provide education and trainings on food safety and food safety awareness;
  - Assist in developing best practices related to food safety;
  - Organise inspections and provide input for criminal investigations related to feed and food safety.

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35 Available at vietnamnews.vn/society/261458/safety-quality-key-to-export-growth.html
3.1.3 Stewardship
Relevant Ministries: Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

Issue description
Farmers are facing multiple challenges every day, including financial problems, low yields and coping with natural disasters. Therefore they need to be equipped with tools and technologies that can help them manage their crops properly so as to maximise yields and quality. Stewardship plays a vital role in fostering good agricultural practices and ensuring responsible use of crop protection inputs, waste management and secure storage.

Potential gains and/or loss for Vietnam
Agriculture is a major contributor to the Vietnamese economy but years of under-investment in rural development and agricultural research have left farmers exposed to dealing with food security pressures, increasing input costs and climate change issues. All these have led to a decrease in productivity for farmers and to a negative impact on the environment through overuse of chemicals and abandoned chemical containers.

Recommendations
- Promote and educate farmers on Good Agricultural Practices (GAP) including the Five Golden Rules and Responsible Use;\(^{37}\)
- Implement measures to ensure the proper disposal of empty containers to protect the environment;
- Implement the International Code of Conduct to safeguard pesticide management practices.\(^{38}\)

3.1.4 Quality of Laboratories and Testing
Relevant Ministries: Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

Issue description
The quality of laboratories and testing methods are also important to improve food safety. We also believe that all companies should be treated in the same way and the control of products should be the same before they are allowed to enter Vietnam. Practice has shown this is not always the case.\(^{39}\) A recent case also has shown that improvement is necessary, because two tests by different testing agencies for the same product had different results, and were therefore inconclusive as to whether the product was safe or not.\(^{40}\)

Besides this, the testing method does not always guarantee safe food. For example sanitary and phytosanitary requirements on heavy metals should not be tested for the total concentration of heavy metals. More specific analyses are needed that focus only on those types of heavy metals that actually affect human, animal and plant health. Indeed, certain harmful types of heavy metals can be very present and concentrated while the total concentration of heavy metals is still acceptable. In addition, the equipment used is often not sufficiently up-to-date to test adequately. Testing imported or local food products for contaminants such as bacteria, total plate count, yeast and mould for the purpose of food safety is for example done through so-called ‘traditional methods’ using Petri dishes. These procedures are complicated, time-consuming, and they do not guarantee safe food.

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\(^{37}\) Available at www.fao.org/prods/gap/
\(^{38}\) Available at croplife.org/crop-protection/regulatory/product-management/international-code-of-conduct/
\(^{39}\) Available at english.vietnamnet.vn/fms/business/114672/management-of-fruit-imports-in-a-muddle.html
\(^{40}\) Available at vietnamnews.vn/society/258756/probe-launched-into-customs-food-tests.html
In addition to this, a broad spectrum analysis of active ingredients (AI) cannot be performed in Vietnam; the laboratory needs to be told for which specific AI the product should be tested. However, this test is very important for companies exporting to for example the EU, which has set MRLs for pesticides, hormones or other allowed substances. Practice has, however, shown that it is not always clear what pesticides or other substances farmers have used. Therefore the exporter does not know what he should have tested, while a broad spectrum analysis will show if the product stays below the allowed MRLs. If the exporter does not want to risk entire containers to be rejected he has to send samples for testing to Europe. This is costly and will increase the price of the product, and on top of this it will damage the reputation of the exporter, if goods are repeatedly rejected\(^\text{41}\), and even Vietnam in general, as the recent warning of the EU CPA has shown. Testing in Vietnam also takes longer than in Europe.

At the same time, it is problematic that test results from foreign laboratories are not accepted in the same way as test results from local laboratories, even though they have obtained a world-wide recognised accreditation, such as International Organisation for Standardisation (ISO) 17025.\(^\text{42}\) In Vietnam one needs to obtain an accreditation from for example the Ministry of Health, Department of Animal Health and National Agro Forestry Fisheries Quality Assurance Department, but ISO 17025 certification is not recognised. In our opinion the acceptance of test results should not depend on the licence issued by a Ministry, but it should be enough that a company has been ISO 17025 accredited.

Finally, under Circular 128/2013/TT-BTC, quarantine and food safety testing must, in principle, be carried out at a customs checkpoint.\(^\text{43}\) The facilities at such customs checkpoints are often insufficient, causing delays which may break the cold-chain. This requirement therefore causes food safety issues as well as financial damages for the company.

**Potential gains/concerns for Vietnam**

The current way of testing is costly, time-consuming and often does not guarantee the detection of food safety issues. It is especially important to detect MRLs to be able to export Vietnamese products to for example the EU. An improvement of the current system following our recommendations will be cheaper for companies, which could result in lower consumer prices. It will also result in higher food safety, and the competitiveness and reputation of Vietnamese products will increase. We believe that it is paramount that the quality of laboratories is improved, while testing methods need to be modernised and brought to international standards.

**Recommendations**

- Amend requirements so that a ‘speciation analysis’ is requested for heavy metals.
- Encourage the upgrading of testing methods and facilities to be in accordance with modern, international standards (for example ISO or national organisations for standardisations) to ensure accurate, quick, impartial and fair testing results.
- Accept test results on food safety of foreign laboratories that are ISO 17025 certified, in the same way as test results of local laboratories; without requiring additional accreditation.
- Make accreditation for national laboratories according to international standards, such as ISO, obligatory.
- Allow importing companies to store frozen food products in their own or neutral storage facilities for

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\(^{41}\) For example the company sources weekly from 200 farmers, so every week 200 samples have to be sent to Europe for testing.

\(^{42}\) ISO 17025 is the single most important standard for calibration and testing laboratories around the world, so laboratories accredited ISO 17025 have demonstrated that they are technically competent and able to produce precise and accurate test and/or calibration data.

\(^{43}\) Circular 128/2013/TT-BTC dated 10 September 2013 on customs procedures, customs supervision and inspection; export tax, import tax, and administration of tax on exported goods and imported goods.
quarantine and food safety inspections to avoid breaking the cold-chain.

### 3.1.5 Legal Framework, Coordination and Enforcement

#### Relevant Ministries: Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

#### Issue description

In the view of the World Health Organisation and the Food Agricultural Organisation, good food management is undermined by fragmented legislation, weaknesses in surveillance, monitoring and enforcement.\(^{44}\) Progress has been made in 2012 and 2013, but more steps need to be taken to further improve the legal framework, coordination and enforcement of rules and regulations applicable to the sector.

For example, a wax from the EU could be used to better present a locally cultivated fruit destined to be exported. This wax can be legally used within the EU. However, documents needed according to Vietnamese law to approve the import of this by the MOH cannot be obtained from the EU member State because such a document is not issued there. This means that the MOH will not approve, and the locally cultivated fruit is – compared to fruits produced elsewhere and treated with this wax – less attractive for export.

A second example used to illustrate difficulties with enforcement of food safety standards in Vietnam is related to potassium bromate (E924), an additive often used in the bread-baking industry. It has been banned in the EU since 1990 and in many countries world-wide, as it is carcinogen and can be replaced by other products.\(^{45}\) It is not on the list of authorised additives in the food industry in Vietnam either. Despite verbally agreeing that such additives should not be used, Government agencies do not seem to be willing to issue a statement in writing that the additive is not allowed. Such a document could make enforcement easier, although problems have been identified with the enforcement of the regulation by relevant authorities.

Another issue is that several small animal-feed manufacturers add growth hormones to pig feed. This is done to shorten the growth period of the animal, to make the animal look better (before selling), and to have leaner meat. However, the use of these hormones has damaging effects on the health of consumers.\(^{46}\) Because of the carcinogenic risks, the use of growth hormones has been banned in the EU since 1989. The use of growth hormones is not allowed in Vietnam either, but often enforcement of this regulation is weak. Earlier this year, several provinces in North Vietnam have strictly enforced the regulations forbidding the use of these hormones.\(^{47}\) This has discouraged many producers from putting growth hormones in animal feed and many farmers no longer buy this animal feed.\(^{48}\)

#### Potentials gains/concerns for Vietnam

Vietnam’s acceptance of products authorised in the EU as well as strict enforcement will allow increasing the potential of Vietnamese products and exports to the EU market.\(^{49}\) If a substance is not allowed to be used, especially if it has damaging effects, it is important to enforce the law. Alternatives to banned substances exist or can be found, as illustrated by practices in other countries.

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\(^{44}\) Available at www.wpro.who.int/foodsafety/documents/docs/English_Guidelines_Food_control.pdf

\(^{45}\) Available at www.ncbi.nlm.nih.gov/pmc/articles/PMC1567851/

\(^{46}\) Available at www.preventcancer.com/consumers/general/hormones_meat.htm and ec.europa.eu/food/fs/sc/scv/out21_en.pdf

\(^{47}\) Available at vietnamnews.vn/society/259271/pig-farmers-targeted-in-chemical-probe.html

\(^{48}\) Decree 119, see note 27 and see www.iasvvn.vn/san-pham/tin-the-truong/cong-ty-thuc-an-chan-nui-duong-chat-cam-da-co-gay-nhung-ai-xu.html

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Recommendations

- Allow products that can be legally used in other countries, to be imported into Vietnam without additional documents.
- Encourage strict enforcement of existing regulations as this will cause producers to obey existing regulations.
- Enforce international laws and standards on banned substances/additives.

### 3.1.6 Counterfeit products

Relevant Ministries: Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

#### Issue description

Counterfeit and illegal crop protection products are on the rise, creating devastating losses for farmers and the agricultural industry. Counterfeit pesticides are rarely tested and may contain unknown toxic impurities which may pose risks to farmers and consumers’ health. Furthermore counterfeit products can severely damage crops or can lead to rejection of the produce by food companies due to unwanted residues. All these factors can put the income of farmers in jeopardy.

#### Potential gains for Vietnam

Illegal products adversely impact the economy as counterfeits act as an investment deterrent and as innovation is stifled or discouraged.

#### Recommendations

- Put in place an effective regulatory framework which does not compromise safety and efficacy.
- The protection of regulatory data and confidential business information is important to support innovation and development.
- Intellectual Property protection is necessary to encourage continued investment in research and development, and to ensure the plant science industry maintains its strong innovative base.
- Enforcement of laws to protect IP rights and to seize illegal products from the market.

### 3.1.7 Public Private Partnerships and Best Practices

Relevant Ministries: Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

#### Issue description

PPP projects have boosted agricultural output two to three times, and have increased farmers’ incomes by 10-15%. PPP allows the creation of production chains that meet international standards, increase output, while at the same time the sustainability of the sector will be improved.\(^5\)

In this paragraph we would like to describe some examples of PPP projects that at the same time can be considered as best practices. We believe these examples show that PPP can work very well in the agribusiness sector.

Coffee farmers in Vietnam are only small holders and they need to improve production in a sustainable manner, using limited quantity of farmland in an optimal way. The excessive use and wrong form (ammonia vs. nitrates) of input can have a negative impact on the environment, and it does not necessarily lead to a better output. All this reduces pressure for deforestation, greenhouse

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gas emissions, water loss and loss of biodiversity. Following the World Economic Forum of June 2010, an initiative in the form of a PPP was started to improve the coffee output sustainability involving the whole coffee value chain. The local farmers were engaged as ambassadors to spread best practices with regard to use of fertilisers amongst their peers. The result of the project is that the output and profitability have increased by 10% while the carbon footprint and water usage have been reduced by 50%, and the quantity of fertiliser has been reduced by 20%. This initiative also resulted in the creation of the Vietnam Coffee Coordinating Board aimed to strengthen Vietnam’s position as exporter of sustainable produced coffee.

Our second example is related to the dairy industry. The demand for fresh milk in Vietnam is growing, but the dairy sector is underdeveloped and around 75% of all dairy products are imported. This means that local dairying must develop to meet this growing demand. However, family-owned farms in Vietnam are very small, with an average of less than ten cows per farm; and they often lack knowledge and skills. A current project funded by the Dutch Government is intended to develop the sector in a sustainable way while increasing the production of fresh milk to meet current and especially future market demands. Within five years three dairy zones will be set up, and each dairy zone will consist of fifty farms with each fifty milking cows. Investments are made to make dairying at family-owned farms more professional. At the same time proper infrastructure systems will be set up to guarantee the highest quality milk.

Potential gains/concerns for Vietnam
PPP makes it possible to increase the output in the sector in a sustainable way providing the farmers with a higher income. At the same time import of these products can decrease. Moreover, as the quality of products is increased, these products can be exported more easily as they will get a better reputation.

Recommendations
- Encourage development of PPPs following best practices

3.1.8 Control of the Use of Pesticides
Relevant Ministries: Ministry of Agriculture and Rural Development (MARD), Ministry of Health (MOH), Ministry of Industry and Trade (MOIT), Ministry of Science and Technology (MOST)

Issue description
The issue of food safety is discussed extensively throughout this chapter. However, EuroCham’s CropLife Sector Committee would like to highlight their concerns regarding the use of pesticides. As described in previous paragraphs, a major concern for safe food production is the improper use and application of poor quality pesticides. This can adversely affect the health of pesticide applicators and consumers of the agricultural product, as well as harm the environment. In addition, it can economically affect exported agriculture products as they can be rejected due to the exceeding of maximum residual levels.

Potential gains and/or loss for Vietnam
Ensuring pesticide control would contribute to Vietnam’s safe food production, with the positive effects described in previous paragraphs.
Recommendations

- Set up technical barriers to eliminate the use of high-risk pesticides that can harm human beings and the environment.
- Encourage responsible and ethical management and use of pesticides, following good practices in selling good products, proper labelling and in compliance with the provided instructions.
- Establish regulations with specific criteria to encourage the introduction of new-class crop protection products with advanced techniques and technologies.
- Focus on using good quality and safe pesticide products.
- Provide qualified education programmes for farmers to reiterate the importance of proper use of pesticides and following instructions on labels.