

# Telling Apart the Bad from the Good Guys Behind the Spraying Mist

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# 1 Telling Apart the Bad from the Good Guys Behind the Spraying Mist

## 2 Improved Sampling and Pesticide Residue Testing for Organic Farm Compliance As- 3 sessment

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## 14 Abstract

15 Residues of pesticides not allowed in organic farming are often found in organic food. A large  
16 number of samples are being tested by organic certifiers, but the sampling methods often do  
17 not allow to determine if such residues stem from prohibited pesticide use by organic farm-  
18 ers, from mixing organic with conventional products, from short-range spray-drift from neigh-  
19 bour farms, from the ubiquitous presence of such substances due to long-distance drift, or  
20 from other sources of contamination. Eight case studies from different crops and countries  
21 are used to demonstrate that sampling at different distances from possible sources of short-  
22 distance drift allows in most cases to differentiate deliberate pesticide application by the or-  
23 ganic farmer from drift. Datasets from 67 banana farms in Ecuador, where aerial fungicide  
24 spraying leads to a heavy drift problem, were subjected to statistical analysis. A linear discri-  
25 minant function including four variables was identified for distinguishing under these condi-  
26 tions application from drift, with an accuracy of 93.3%.

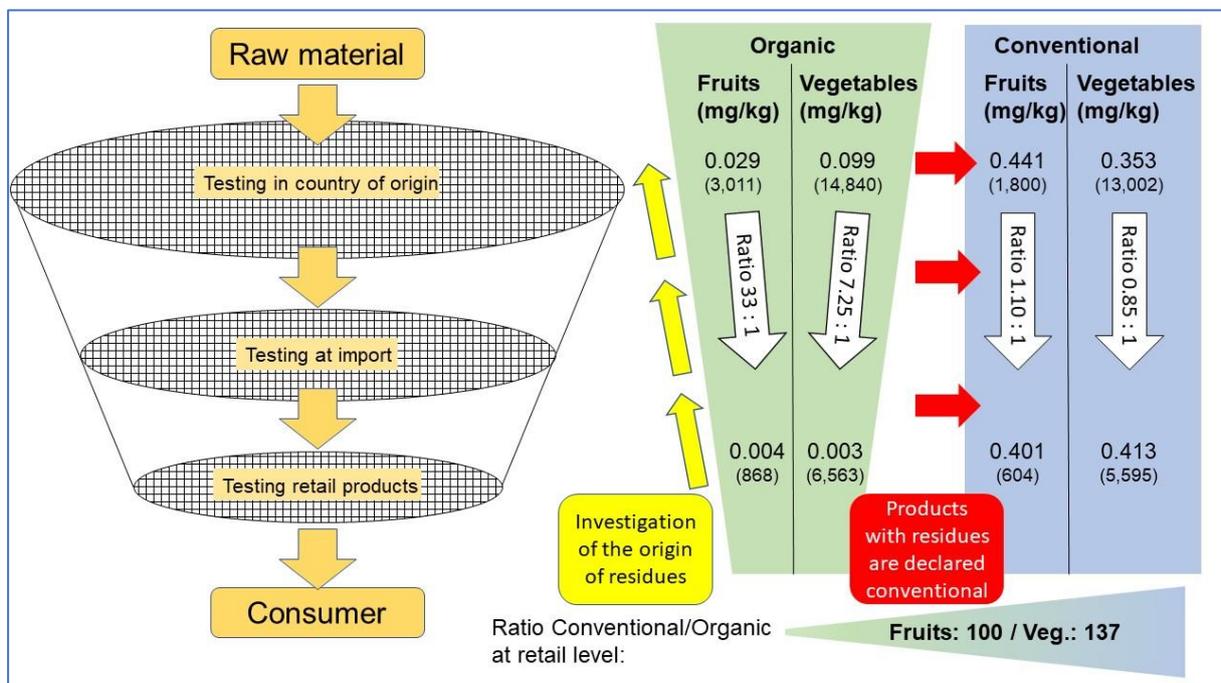
## 27 Keywords

28 Organic certification, Pesticide residues, Spray-drift, Sampling, Discriminant analysis, Super-  
29 vised learning

## 30 1 Introduction

### 31 1.1 Pesticide Residues in Organic Products

32 Non-use of synthetic pesticides is a major characteristic of organic farming, with the objec-  
33 tives of protecting (a) the environment, (b) consumer health, and (c) farm worker health. In  
34 consumer studies, "no chemical pesticides" is usually mentioned as one of the most im-  
35 portant criteria for buying organic food.<sup>1,2</sup> These consumer expectations are mostly met in  
36 what is referred to in objective (b), because the levels of pesticide residues in organic food  
37 offered in retail stores are low. The food authority in Baden-Württemberg, Germany, has  
38 been comparing pesticide residues between organic and conventional products since 2002.  
39 Taking the example of fruits and vegetables from 2013 to 2019, on average the residues  
40 were more than 100 times lower than in conventional vegetables<sup>3</sup> (Figure 1).



41  
42 **Figure 1: Multi-layer sieving model for residue testing at different points of the organic supply chain.**  
43 *The figures for organic and conventional fresh fruits and vegetables, respectively, represent the aver-*  
44 *age total amount of pesticide residues found per sample. Above the white arrows: values found by the*  
45 *accredited commercial laboratory Eurofins Dr. Specht International, representing samples from prod-*  
46 *ucts taken at different points of the supply chain. Below the white arrows: values found by the food au-*  
47 *thority CVUA,<sup>3</sup> representing retail products sampled from supermarkets, farmer markets and organic*

48 food stores. Data in brackets represent the number of samples tested. Eurofins figures are from 2020  
49 only, CVUA figures from 2013 through 2019. Ratios from wholesale to retail are shown in the white ar-  
50 rows. While the figures for conventional products remain in the same range in the process from whole-  
51 sale to retail (blue rectangle to the right), the residues for organic products are very substantially re-  
52 duced during this process (green trapezium). As a result, residues at retail level are 100 and more  
53 times lower in organic than in conventional products (trapezium at the bottom). This shows that the  
54 process represented by the red arrows works fairly well – which is not always the case for the investi-  
55 gation of the origin of such residues, as represented by the yellow arrows.

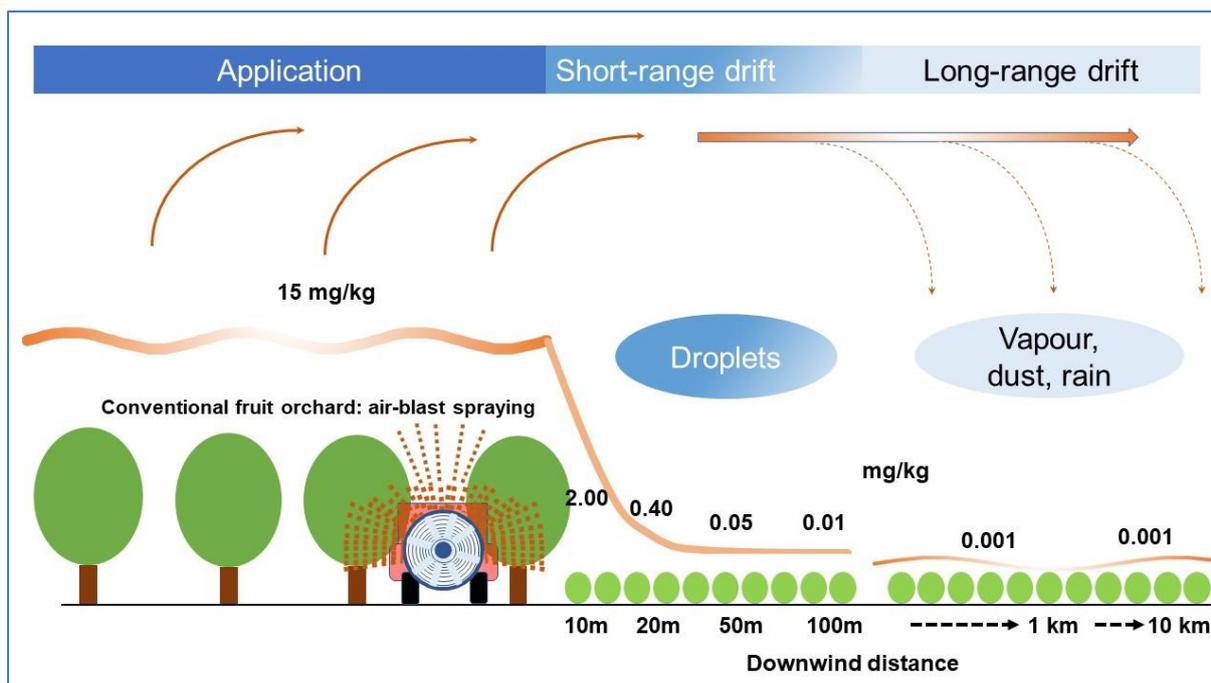
56 Unfortunately, this good news for consumers with respect to objective (b) does not always  
57 mean that objectives (a) and (c) are also met. With the steady growth of the organic market  
58 and globalisation of supply chains, fraud has also grown.<sup>4,5</sup> Pesticide residues in organic  
59 products can be the result of fraudulent spraying by farmers, commingling organic with con-  
60 ventional products, selling conventional products as organic, spray-drift, or different (avoida-  
61 ble or unavoidable) sources of contamination along the supply chain.

## 62 1.2 Two Forms of Spray-Drift

63 Over the past decades, a distinction has been made between short distance **primary** spray-  
64 drift **during** the application, and long distance **secondary** spray-drift occurring **after** the ap-  
65 plication.<sup>6</sup> The latter was attributed to evaporation and considered to play a role only for pes-  
66 ticides with high vapour pressure.<sup>7</sup> On the one hand, recent studies have shown that evapo-  
67 ration and long-distance transport can already play a role **during**, not only after application.<sup>8</sup>  
68 On the other hand, long-distance transport has been found to be linked not only to evapora-  
69 tion. Pesticides adherent to dust from wind erosion can contaminate large areas.<sup>9</sup> In the pre-  
70 sent context, we use the terms **short-range** and **long-range** drift, instead of primary and  
71 secondary drift (Figure 2).

## 72 1.3 Long-range Drift

73 Long-range drift is so far poorly understood, can lead to (normally very low) residues at dis-  
74 tances as far as thousands of km,<sup>10</sup> and happens in the form of vapour or molecules adhered  
75 to dust. The main factors influencing long-range drift are vapour pressure of the pesticide,  
76 capacity of adherence to dust, incidence of wind erosion, and temperature inversion in the  
77 atmosphere.<sup>7</sup> Long-range pesticide drift has recently received more attention.<sup>11,12,13,14,15</sup> Ex-  
78 amples have been used in the context of organic certification for supporting the argument of  
79 ubiquity of pesticides, linked to the assumption that low- or even medium-level residues in



80  
 81 *Figure 2: Simplified model of short-range vs. long-range drift originating from air-blast spraying in a*  
 82 *fruit orchards. The specific values for pesticide concentrations (mg/kg) expected for different down-*  
 83 *wind distances from the orchard can vary by a factor 10 or more, depending on the applied substance,*  
 84 *dose, weather conditions, vegetation, etc., but the graph provides an approximate estimate of the ra-*  
 85 *tios that can be expected. In the case presented here, pesticide concentration in fruit leaves immedi-*  
 86 *ately after the application is 15 mg/kg. In the area of short-range direct drift, deposit decreases expo-*  
 87 *ponentially, so that at 100 m distance, we can expect to find only 0.01 mg/kg. At further distances, de-*  
 88 *posits are often below this level.*

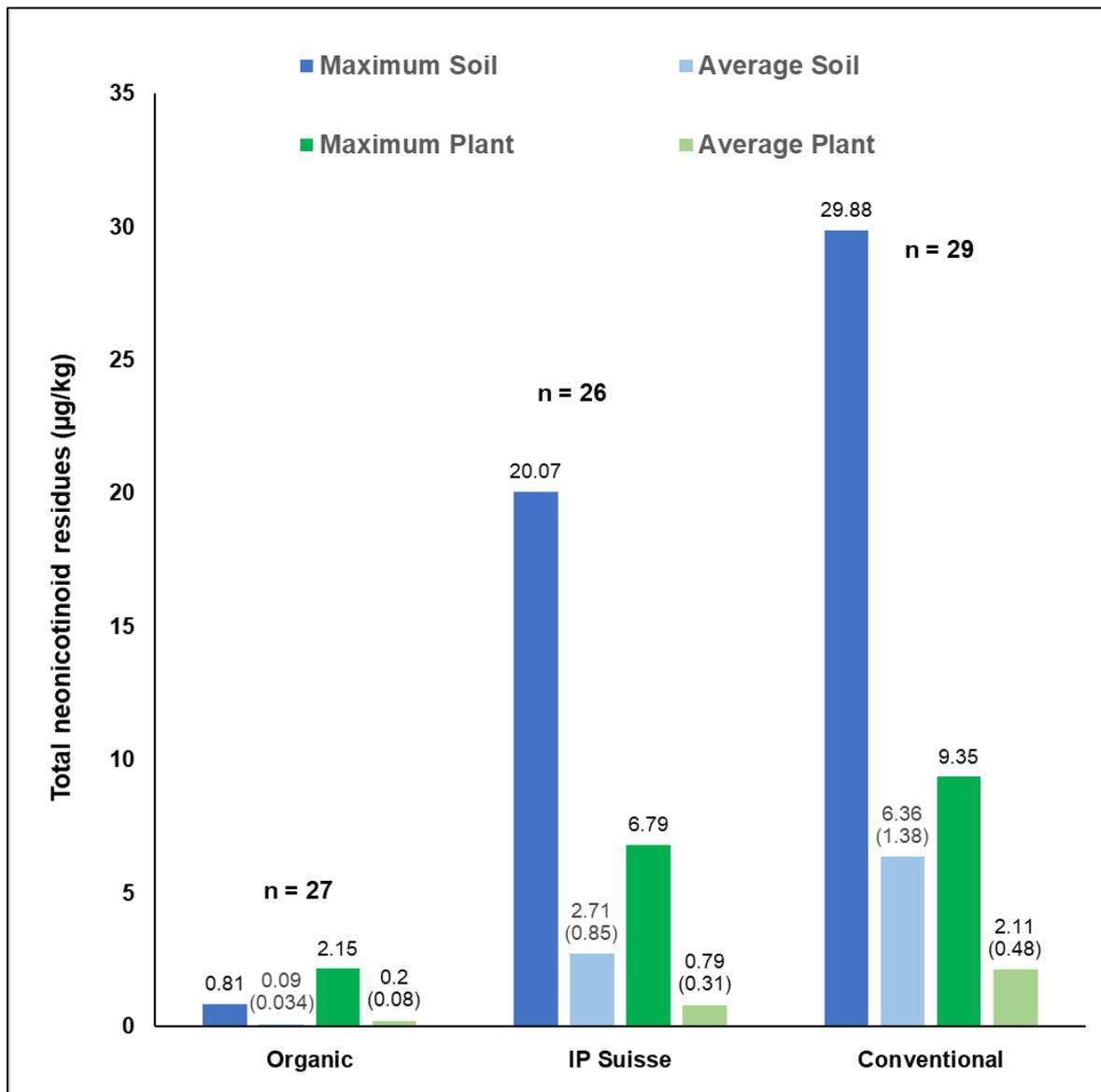
89 organic products are often derived from their omnipresence in the environment.<sup>16,17</sup> Cases  
 90 from Brazil (endosulfan in soybeans), Montana (USA) and Saskatchewan (Canada) (glypho-  
 91 sate in khorasan wheat) and Germany (pendimethalin and prosulfocarb in different crops)  
 92 have been quoted to demonstrate the ubiquity of pesticides.<sup>17</sup> None of these case studies,  
 93 however, provides solid evidence for the assumption that long-distance transport of pesti-  
 94 cides leads to residues in organic food above the level of, say, 0.01 to 0.03 mg/kg. The prob-  
 95 lem of the herbicides pendimethalin and prosulfocarb being subject to long-distance drift be-  
 96 cause of their high vapour pressure, has been known for a long time,<sup>18</sup> but this phenomenon  
 97 cannot be extrapolated to other substances. Even for these herbicides, there is no evidence  
 98 that residues at larger distances could be above the indicated levels. On an average of 15  
 99 vegetation samples from nature reserves in Germany, 0.009 mg/kg pendimethalin and 0.004  
 100 mg/kg prosulfocarb were found.<sup>19</sup> Exceptions may exist, e.g., when pesticide applications are  
 101 followed by heavy wind erosion, as seems to be the case in some of the North American  
 102 wheat growing areas, where glyphosate is used for cereal desiccation shortly before harvest.

103 In a survey in Switzerland,<sup>20</sup> neonicotinoid residues were found in 93% of plant samples from  
104 organic farms (as compared to 100% of samples from conventional farms), thus supporting  
105 the ubiquity suspicion. But there were substantial quantitative differences between organic  
106 and conventional farms (Figure 3). The average sum of neonicotinoid residues in plant and  
107 soil samples from organic farms was lower by a factor of 11 than that of plant samples from  
108 conventional farms. For soil samples, this factor was as high as 71. Even the highest value  
109 for one single substance (imidacloprid) found in organic plants ( $2.13 \mu\text{g}/\text{kg} = 0.00213 \text{ mg}/\text{kg}$ )  
110 would be below the limit of quantification (LOQ) used for this substance in most screenings  
111 ( $0.01 \text{ mg}/\text{kg}$ ).

112 In a study in Germany<sup>19</sup>, total mean pesticide concentration in natural vegetation in five refer-  
113 ence areas (average distance from arable fields > 3 km) was  $0.003 \text{ mg}/\text{kg}$ , and in 15 nature  
114 conservation areas (average distance from arable fields 143 m) it was  $0.006 \text{ mg}/\text{kg}$ , but in  
115 three buffer zones (average distance 54 m) it was  $5.4 \text{ mg}/\text{kg}$ . (To make figures comparable  
116 with other data in this article, we have deducted the concentration of non-agricultural pesti-  
117 cides from the total amounts, and divided the numbers by a factor five, because the residues  
118 in this study refer to dry matter, while all the others use fresh matter). Although  $5.4 \text{ mg}/\text{kg}$  at  
119 54 m distance is a disturbingly high value, the survey confirms that concentrations at larger  
120 distances do not exceed the "traces" level. The intention of this article is not to put in doubt  
121 the environmental damage caused by such traces. We try to show that the "ubiquity" argu-  
122 ment may sometimes be hiding cases of fraudulent pesticide use by organic farmers.

#### 123 **1.4 Short-range Drift**

124 As opposed to long-range drift, short-range drift is well understood, has its impact mainly in a  
125 range from 1 m up to a maximum of 1,000 m (for aerial spraying), happens in the form of  
126 droplets, and is not substance specific. The main factors influencing this form of drift are  
127 droplet size, windspeed, and height of the boom (nozzles) above soil.<sup>7,10,21,22,23</sup> The fact that  
128 long-range drift is poorly understood and leads to low concentrations of certain substances  
129 over wide areas, should not stop certification bodies (CBs) from using the available



130  
 131 *Figure 3: Maximum and average residues of neonicotinoid insecticides in soil and plant samples from*  
 132 *organic, integrated ("IP Suisse") and conventional farms in Switzerland. The figures represent the sum*  
 133 *of acetamiprid, chlothianidin, imidacloprid, thiacloprid and thiamethoxan. Figures in brackets represent*  
 134 *standard errors.*<sup>18</sup>

135 knowledge about short-range drift as a tool for assessing farmers' compliance with organic  
 136 production rules. The dynamics of short-range spray-drift have been widely studied in the  
 137 context of preventing liability problems due to herbicide damage, contamination of water bod-  
 138 ies and natural habitats, and direct risks for human settlements.<sup>10,21,22,23,25,26,27</sup> Pesticide de-  
 139 posit decreases exponentially with increasing distance from the field, on which the substance  
 140 is applied. With a tractor boom sprayer, deposit at 25 m distance is expected to be only 1%  
 141 of that in the target field. While distances are greater for air-blast or aerial spraying, the basic  
 142 principle of exponential decrease is the same (Figure 2 and Supplementary Fig. 1).

## 143 **1.5 Certifiers' Testing Strategies**

144 Both the EU Regulation on organic farming and the US National Organic Program (NOP) re-  
145 quire certification bodies (CBs) to take samples from at least 5% of their clients every year. A  
146 large amount of data is being generated through this mechanism, but the sampling proce-  
147 dures and interpretation of results often do not allow to derive clear results.

148 Testing at different points along the organic supply chain could be an excellent tool for de-  
149 tecting non-compliance with organic production rules. The idea behind this is depicted in Fi-  
150 gure 1. The filter process as such, and the exclusion of contaminated batches from the or-  
151 ganic market, as represented by the red arrows, often work well. Thus, there are significantly  
152 lower average amounts of residues after undergoing this filtering process across the supply  
153 chain. The fact that residues in organic produce reported from the wholesale and processing  
154 levels are massively higher than those reported from retail samples (33 times higher for veg-  
155 etables and 7 times higher for fruits) while they vary little for conventional produce, shows  
156 that market actors often remove problematic produce by declaring it conventional. However,  
157 the information about these switches is not always reaching the CBs, thus impeding the in-  
158 vestigation of the origin of residues and the exclusion of excluding fraudulent actors from the  
159 market (yellow arrows in Figure 1).

160 Not only for market actors, however, but also for many CBs, the purpose of sampling and  
161 testing is limited to ensuring that food sold on the market with an organic claim, is free of  
162 pesticide residues. A recent unpublished BSc thesis at the University of Kassel revealed that  
163 80% of the samples by CBs in ten EU member countries are taken of final products, but only  
164 20% from the field or during the production process.

165 The differentiation between active use and non-intentional contamination is difficult, though, if  
166 only final products are tested. Plant (mainly leaf) samples from the field have several ad-  
167 vantages in this regard: (a) Often, there is a long time span between pesticide application  
168 and harvest. Because of dissipation of the residues, nothing or only traces may be found in  
169 the final product (Supplementary Table 1). Field samples can be taken during or shortly after

170 a suspected pesticide application, which leads to better results. (b) Leaves have a sur-  
171 face/weight ratio between 10 and 118 cm<sup>2</sup>/g<sup>28</sup>, whereas for fruits this ratio is between 0.6 and  
172 2.2<sup>29</sup>, and for seeds between 2 and 10 cm<sup>2</sup>/g only<sup>30,31,32</sup>. Residues in leaves are therefore  
173 normally higher than in seeds, fruits or roots, which makes interpretation of test results eas-  
174 ier. (c) Field sampling allows to take separate samples from centre and margin of the field, as  
175 explained below in more detail.

176 Unfortunately, if CBs take field samples at all, they often take them **only** from field mar-  
177 gins<sup>33,34</sup> ("let's see if there is a drift problem"). Positive results are then attributed to spray-  
178 drift, and farmers are required to establish buffers – without even considering the possibility  
179 of residues originating from an application by the organic farmer. Such procedures open the  
180 door for fraudulent use of pesticides by organic farmers.

181 Other CBs have established so-called "action levels", below which they consider the pres-  
182 ence of residues in organic products to be the result of ubiquitous environmental contamina-  
183 tion, with no need to investigate their origin.<sup>33</sup> While such "action levels" may be necessary  
184 for specific cases (see below concerning the banana industry), using this approach in a gen-  
185 eral way disregards not only the spatial distribution, but also temporal dynamics of pesticides  
186 in plant tissue. As opposed to soil, half-lives in plant tissue exposed to UV radiation and  
187 weather, are relatively short for most modern pesticides<sup>35</sup>. A residue level of 0.02 mg/kg,  
188 used by some CBs as "action level", is typically reached one to two months after the applica-  
189 tion of a pesticide, in some cases even after only five days (Supplementary Table 1).

## 190 **1.6 Objectives**

191 The objectives of our study are: (I) to demonstrate that appropriate field sampling methods  
192 can differentiate the effects of fraudulent pesticide application by the organic farmer, from the  
193 results of both short-range and long-range spray-drift, and (II) for the specific case of aerial  
194 fungicide spraying in the banana industry, identify appropriate variables, which allow us to  
195 interpret the test results correctly for the purpose of this differentiation.

## 196 **2 Materials and Methods**

197 **2.1 Case Studies from Different Crops and Countries**

198 To demonstrate the appropriateness of differentiated field sampling (objective I), in a first part  
 199 of our study we selected from the CERES archive six cases (Table 1), and one case from the  
 200 GfRS archive (N° 6 in Table 1).

201 *Table 1: Overview of case studies*

Country	Crop	Type of sample	Approx. distance border to centre samples	Specific conditions to be considered
1. Chile	Apples, Blueberries	Leaves	100 m	High level of spray-drift because of air-blast spraying on conventional neighbour farms
2. Togo	Soybeans	Dry plants	20 – 40 m	Small fields, low level of spray-drift because farmers use manual knapsack sprayers
3. Thailand	Rice	Straw	50 m	Small field, good buffers between organic and conventional fields, irrigation
4. Ecuador	Cocoa	Leaves, cocoa beans, weeds	100 to 300 m	2,4-D had been found by a Belgian importer in cocoa beans. Conventional banana farms with a high level of drift in the neighbourhood. 2,4-D is selective for control of dicotyledonous weeds, mainly in cereals, but is frequently used in Latin America also for weed control in perennial crops such as cocoa.
5. Bulgaria	Oil-bearing roses	Leaves	200 to 600 m	The inspector had been made believe that a risk of spray-drift did not exist, because conventional neighbour fields were semi-abandoned. Therefore, he had taken only one sample from the centre of the farm, composed of several sub-samples. Later, it turned out that one neighbour had sprayed his rose plantation, using air-blast equipment, four days before the organic field had been sampled.
6. Germany	Grapes	Leaves	10 – 15 m	Small fields, very heavy drift, samples taken during spraying season.
7. Moldova	Walnuts	Kernels, fresh nuts, leaves	100 to 400 m	This case is different from the others, because the walnut trees are wild or abandoned. Requirements for organic certification of wild collection include, among others, harvest from areas, where no pesticides have been applied during three years, and which are not exposed to spray-drift from conventional farming.
8. Ecuador	Bananas	Leaves and fruit peels	Ca. 200 m	Very high level of spray-drift because of aerial fungicide spraying. In addition, terrestrial spraying of insecticides and herbicides is common (insecticides and herbicides were not considered for this case study, however).

202

203 For differentiating drift from an application by the organic farmer, it would be preferable to  
 204 test samples taken at **several** distances from the potential source of spray-drift, to find out if  
 205 a gradient similar to the theoretical exponential decrease exists. In most cases, however, this

206 would be too costly. Therefore, only two samples are normally taken: one close to the possi-  
207 ble source of spray-drift, and one at the centre of the organic field. Exceptions are those  
208 cases, where an organic field is surrounded by several conventional fields.

209 Detailed sampling records are kept. Samples are stored in PE bags. When there is a risk of  
210 samples rotting during storage and transport, paper bags are used. Bags are sealed and  
211 sent to accredited laboratories for multi-residue screening following DIN EN 15662:2018-07  
212 mod. LC-MS/MS, GC-MS/MS, GC-NCI-MS.

## 213 **2.2 Variables that allow Interpretation of Test Results on Aerial Spray-** 214 **Drift in the Banana Industry in Ecuador**

215 Frequent aerial spraying in this industry leads to strong spray-drift, often with overlaps from  
216 several conventional neighbours on different sides of the organic farm. In addition, the high  
217 frequency of 17 to 35 applications per year<sup>36</sup> often leads to temporal overlaps of residues de-  
218 rived from several spraying events. To identify appropriate variables that allow under these  
219 conditions to discriminate between fraudulent application and spray-drift (objective II), a total  
220 of 476 residue tests from Ecuador from 2018 and 2019 were analysed. From these, 24 were  
221 excluded because of sampling mistakes. In most cases, to reduce testing costs, first a mixed  
222 sample from border and centre is tested (Supplementary Fig. 3). Based on the assumption  
223 that, due to the overall heavy drift problem, residues in mixed samples below 0.1 mg/kg were  
224 derived from drift and did not require separate testing, 119 mixed samples were identified as  
225 "drift" and no separate testing of margin and centre done. These were excluded from the sta-  
226 tistical analyse. Residues in 20 mixed samples were so high that they were immediately  
227 identified as "application" and were also not considered. This left datasets from 67 farms with  
228 222 individual samples (i.e. 67 centre and 155 border samples), which were analysed sepa-  
229 rately and then subjected to statistical analyses. Of the 67 cases, 14 had been identified as  
230 "application", 48 as "drift", while five had remained "unclear".

231 Thirty-nine variables (Supplementary Table 2) were tested for their suitability for telling apart  
232 spray-drift from deliberate fungicide use by organic farmers. When the laboratory had found

233 only "Traces < LOQ" for a specific substance, a default value of 0.005 mg/kg was used in-  
234 stead. For testing the variables, multivariate statistical analysis based on logistic regression,  
235 discriminant analysis and support vector machines were performed to find rules that would  
236 classify farms into the two groups.<sup>37</sup> Here, we only report results of the discriminant analysis,  
237 which provided the most satisfactory results. The variable selection and performance of mod-  
238 els and their prediction accuracy were assessed using leave-one-out and *k*-fold cross valida-  
239 tion. The selected variables are graphically displayed using a biplot.<sup>38</sup> A one-way ANOVA  
240 was used to test the statistical significance of these variables between the "application" and  
241 the "drift" farms. The analysis was performed in *R* programming language using MASS, caret  
242 and klaR libraries.

## 243 **3 Results and Discussion**

### 244 **3.1 Case Studies from Different Countries**

#### 245 **3.1.1 Apple and Blueberry Orchard in Chile**

246 The organic apple orchard from Chile has borders with a conventional cherry plantation.  
247 While in the sample taken close to the cherries, 11 different pesticides were found, with dif-  
248 ferent residues adding up to 13.41 mg/kg (the highest value for a single substance was 9.1  
249 mg/kg for captan), at 100 m distance only seven substances were found, with a concentra-  
250 tion of only 3% of the border sample – leaving no doubt that the residues were derived from  
251 drift. Yet, the values were so extremely high that the orchard lost its organic status under  
252 NOP, while under the Chilean organic standard, the farmer had to establish broad buffer  
253 zones. In a nearby blueberry plantation, however, we had the opposite picture: the concen-  
254 tration of imidacloprid in the margin sample was 0.15 mg/kg, while in the centre of the field,  
255 at 100 m from the margin, it was 1.8 mg/kg. This was a clear case of fraud, and the farm lost  
256 its certification.

#### 257 **3.1.2 Soy-Beans from Togo**

258 In the centre sample from farmer 1, 0.023 mg/kg chlorpyrifos was detected, and traces of di-  
259 chlobenil, but no lambda-cyhalothrin. In the margin sample from SH1, however, no chlorpyri-  
260 fos was found, but 0.076 mg/kg lambda-cyhalothrin and 0.005 mg/kg dichlobenil. Thus, most

261 probably there was an overlap of an application (chlorpyrifos) and drift (for the other two sub-  
262 stances). In the case of farmer 2, only traces of deltamethrin were found in the margin sam-  
263 ple, but no residues in the centre, thus this was a clear "drift" situation. From farmer 3, only  
264 one sample was taken, because there was no conventional neighbour. The sample had rela-  
265 tively high residues of fipronil, clearly showing an application (Supplementary Table 3).  
266 These results demonstrate that even for small fields of less than 1 ha, the difference between  
267 residues derived from spray-drift and from application by the organic farmer can often be es-  
268 tablished, especially when neighbours use manual knapsack sprayers. As a result, the  
269 group's internal control system excluded several member farmers from the group and had to  
270 improve its internal member monitoring.

### 271 **3.1.3 Rice Field in Thailand**

272 The insecticides bifenthrin and chlorpyrifos were detected at levels of 0.005 to 0.013 mg/kg  
273 in samples from centre and margin, respectively, of a 4 ha rice field (Supplementary Fig. 2).  
274 The on-site inspection did not reveal any evidence for use of these substances by the or-  
275 ganic farmer. Short-range drift could be ruled out, because in this case the residues in the  
276 centre would be expected to be by a factor 10 lower than in the margin sample. Both insecti-  
277 cides have a low vapour pressure, therefore long-range drift through evaporation is also ex-  
278 cluded. The residues could theoretically originate from an application two to three months  
279 prior to sampling, but also from long-range drift through dust, or contaminated irrigation wa-  
280 ter. Many conventional rice farmers in the region use these insecticides. Under the principle  
281 of "innocent until proven guilty", the farmer remains certified.

### 282 **3.1.4 Cocoa Plantation in Ecuador**

283 For finding the origin of 2,4-D residues detected in organic cocoa beans, different samples  
284 were taken from the cocoa farm. Weed samples from the centre of the plantation had low  
285 levels (0.023 mg/kg) of the herbicide 2,4-D, while weed samples from the field margins and  
286 cocoa leaf samples were free of residues. Several fungicides found in the cocoa leaves prob-  
287 ably came from aerial spraying on nearby banana plantations, but this could not have been  
288 the case for 2,4-D, because aerial spraying of this herbicide would kill the banana plants,

289 while spray-drift from manual knapsack sprayers used in between banana plants, with the  
290 nozzle turned downwards, is almost zero. Also, long-range drift could be ruled out, because  
291 considering the dense canopy of cocoa trees, this would lead to higher residues in the can-  
292 opy itself than in the weeds growing beneath (Supplementary Table 4). Dry weeds observed  
293 by the inspectors in between the cocoa trees provided further evidence of herbicide applica-  
294 tion on the organic plantation. Therefore, the certificate was suspended in spite of the low  
295 residue level.

### 296 **3.1.5 Oil-bearing Roses from Bulgaria**

297 A leaf sample from an organic oil-bearing rose (*Rosa damascena*) field in Bulgaria in 2020  
298 had penconazole residues of 0.62 mg/kg. The farmer's claim of the neighbour spraying at a  
299 wind speed of 11 to 13 m/s seemed unlikely (not only because spraying under such condi-  
300 tions is not effective, but also because data from regional weather stations show a maximum  
301 wind speed of 3.8 m/s for the entire month). Using a spray-drift equation for air-blast spray-  
302 ing<sup>27</sup>:

$$303 \quad y = 3908x^{-2.42} \quad (1)$$

304 with: x = distance from the target field and y = deposit at distance x, expressed as a fraction  
305 of the deposit on the target field,

306 combined with approximate data concerning the impact of wind speed,<sup>10</sup> CERES concluded  
307 that the assumption of these residues being derived from drift, was not plausible (Supple-  
308 mentary Table 5). Penconazole was also detected in a sample of rinse water from the or-  
309 ganic farm's sprayer, further supporting the presumption that it was a case of deliberate ap-  
310 plication. The farm lost its organic status.

### 311 **3.1.6 Vineyards in Germany**

312 Grape leaves were sampled from eight organic vineyards during a period when conventional  
313 farmers were applying fungicides for preventing different fungus diseases. Samples from  
314 seven farmers had residues with a maximum of 0.75 mg/kg for folpet and 0.52 mg/kg for sub-  
315 stances from the dithiocarbamate group. The small size of the vineyards, combined with air-

316 blast spraying by neighbours and possibly air swirling caused by thermal lift in the hilly land-  
317 scape, did not allow for a clear distinction between margin and centre samples. On farm N°8,  
318 however, the folpet concentration reached 73 mg/kg, clearly indicating a direct application by  
319 the organic farmer. This was confirmed later by a sample taken from sprayer rinsing water.  
320 This farmer lost the organic status, while the others remained certified. This decision was  
321 correct assuming that under the given weather conditions, all farmers in the region had  
322 sprayed more or less at the same time, so that drift effects were not confounded with dissipa-  
323 tion effects.

### 324 **3.1.7 Walnuts from Moldova**

325 Between 2017 and 2019, eight out of eight walnut samples from a company in Moldova dedi-  
326 cated to wild collection had low residues of the herbicide 2,4-D (0.013 to 0.031 mg/kg; aver-  
327 age 0.016 mg/kg). Four hypotheses were considered regarding the origin of this phenome-  
328 non: (a) Ubiquity due to long-range transport: 2,4-D is known to be taken up by plant roots  
329 and transported via the xylem.<sup>39</sup> Because of its lipophilic condition<sup>40</sup> it is often found in wal-  
330 nuts. This, together with consistently low residues in all samples from three harvest seasons,  
331 at a first glance made ubiquity in the region the most plausible explanation. (b) For facilitating  
332 harvest, collectors might remove vegetation below the walnut trees with the help of 2,4-D:  
333 This could be ruled out, because it would have been easily visible during on-site visits. (c)  
334 Short-range spray-drift from nearby cereal fields: To verify this hypothesis, leaf samples were  
335 taken from margins and centres of the collection areas. Indeed, the two margin samples had  
336 traces of 2,4-D < LOQ, while the six centre samples were free of residues. However, the find-  
337 ing did not seem to be a plausible explanation for the presence of 2,4-D in **all** walnut sam-  
338 ples from three seasons. (d) Collectors might be delivering nuts from non-certified areas:  
339 This was confirmed through collector interviews. Due to the pressure from the CB, the com-  
340 pany implemented strict measures for preventing delivery of nuts from non-certified areas. As  
341 a result, nine out of nine nut samples from the 2020 harvest were free of residues, thus refut-  
342 ing the ubiquity hypothesis and showing that most probably (d) was the main cause of the

343 problem, possibly in combination with (c). After implementing the necessary measures, the  
344 company kept its organic status.

### 345 **3.1.8 Two Examples from the Banana Industry**

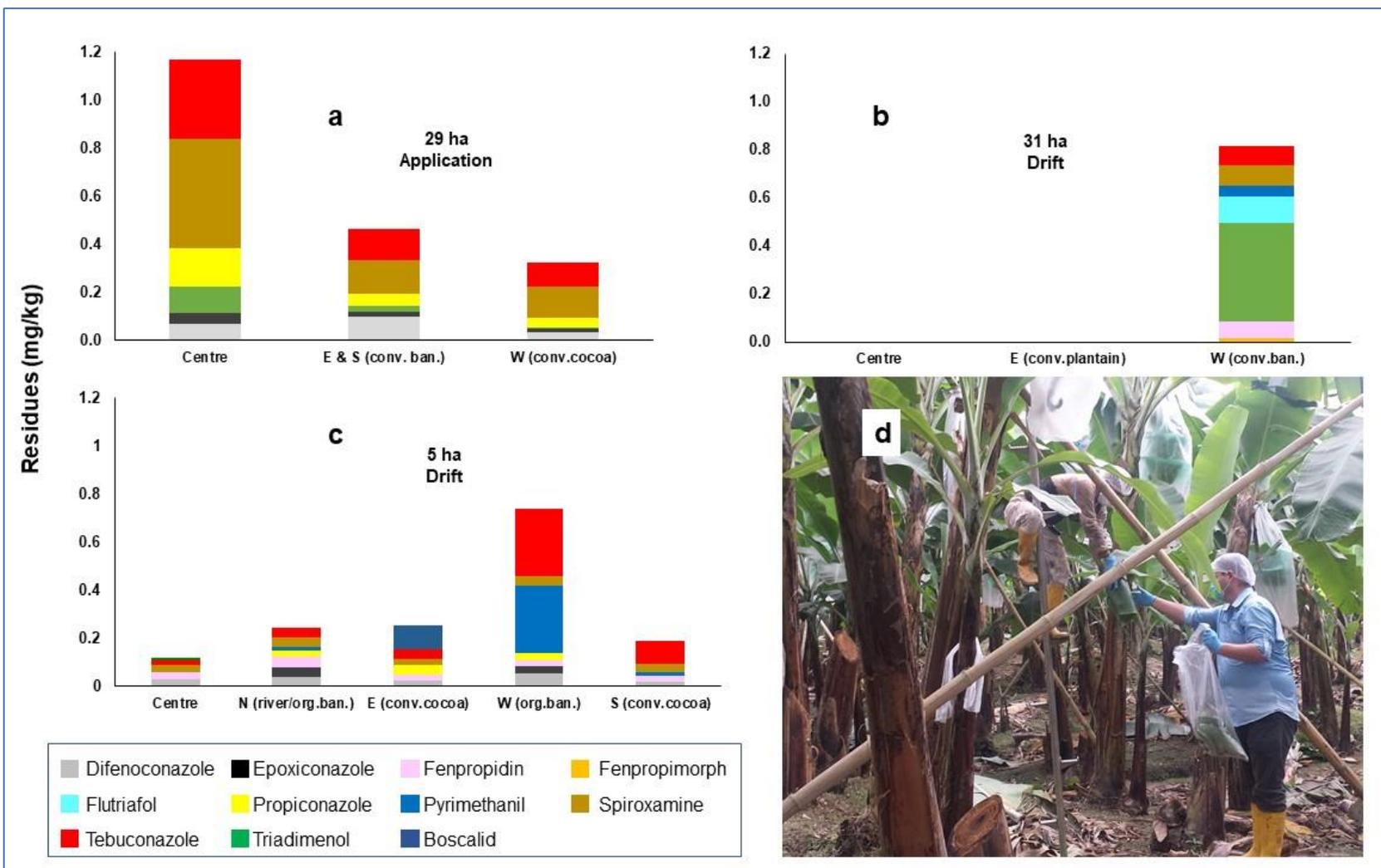
346 Sampling banana leaves is a time-consuming effort (Figure 4d). On the first plantation, the  
347 same six fungicides were found in the centre and in two border samples. Not only the sum of  
348 all pesticide residues was substantially higher in the centre than in the margins, but also the  
349 values for most individual substances (Figure 4a). This did not leave any doubt that the resi-  
350 dues were derived from an application by the organic farmer, whose certificate was then sus-  
351 pended. On the second plantation, however, only the sample taken close to the conventional  
352 banana neighbour had residues, while the samples from the centre and close to a plantain  
353 orchard were free of residues. The residues were derived from drift and the farm kept its or-  
354 ganic status (Figure 4b and Supplementary Fig. 4).

## 355 **3.2 Statistical Analysis of Banana Sample Test Results from Ecuador**

### 356 **3.2.1 Results by CERES**

357 For many cases, however, the decision between "drift" and application was not as clear as in  
358 Figure 4 a and b. As an example, one more difficult case is presented in Figure 4c. In total,  
359 residues of 25 different fungicides were detected, with a group of nine substances (difeno-  
360 conazole, epoxiconazole, fenpropidin, fenpropimorph, propiconazole, pyrimethanil, spirox-  
361 amine, tebuconazole, triadimenol) each occurring in more than one third of the 222 samples  
362 from the 67 farms. The highest value for one single substance was 4.8 mg/kg; 21% of the  
363 centre samples, but only 1.3% of the border samples were free of residues (Supplementary  
364 Table 6).

365 CERES had decided that of the 67 farms included in the analysis, on 14 farms fraudulent  
366 pesticide applications had taken place, while 48 were classified as drift, and five had re-  
367 mained "unclear".

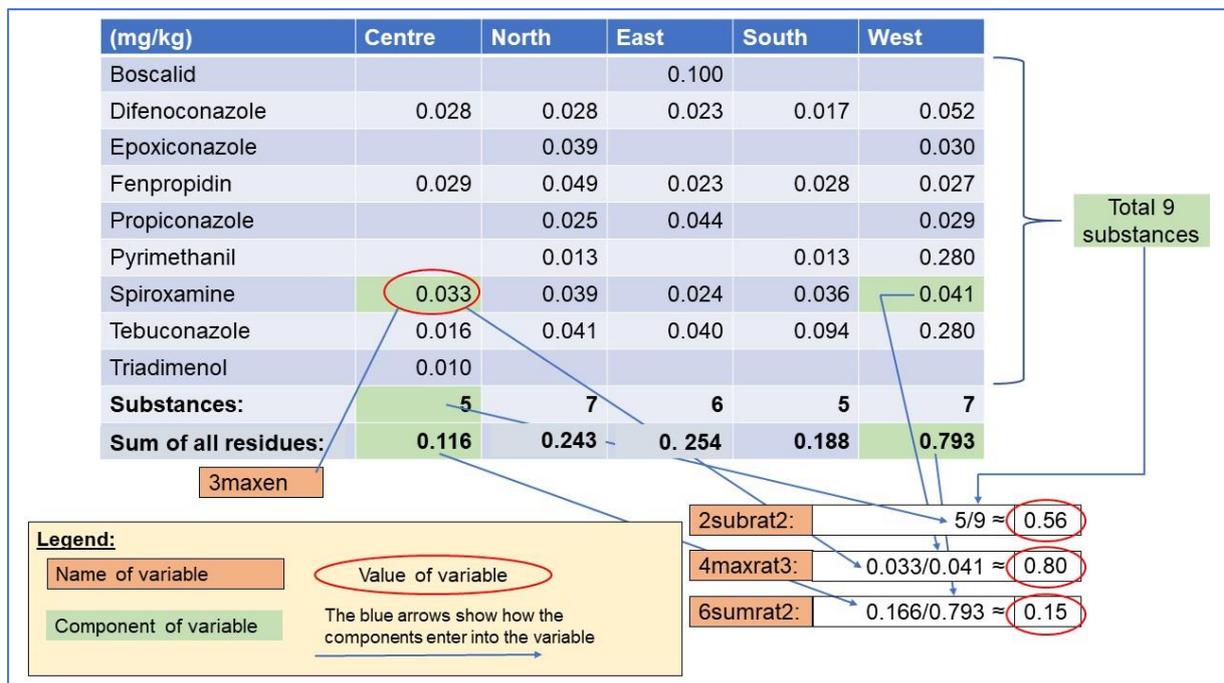


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Figure 4: Residues of different fungicides found in leaf samples from three banana farms in Ecuador: (a) is a clear "application" case, (b) is a clear "drift" case. Also (c) is a "drift" case, but more complex because of the small size of the farm and the many different substances involved. Interestingly, the drift in (c) comes from the West (which is also the main direction of wind), where another organic banana farm (not certified by CERES) is located ("org.ban.", "conv.ban." etc. refer to organic banana, conventional banana, cocoa and plantain farms as neighbours on each side; N, E, S, W to the cardinal points). (a) and (b) are cases from 2017, and are therefore not included in the statistical evaluation, while (c) represents case N° 49 (see also Figure 5). (d) Sampling banana leaves. Photo by L.Guamán.

374 **3.2.2 Statistical Approach**

375 In a first approach, the discriminant analysis identified six variables as the most promising  
 376 ones based on a cross-validated stepwise selection procedure (1subcen, 2subrat2, 3max-  
 377 cen, 4maxrat3, 5sumcen and 6sumrat2, see Figure 5). The one-way ANOVA also indicated  
 378 that the six selected variables are significantly different between the drift and the application  
 379 group (Supplementary Table 7). The biplot based on the first two principal components using  
 380 these selected variables explains 60 and 17% of the total variation, respectively (Figure 6b).

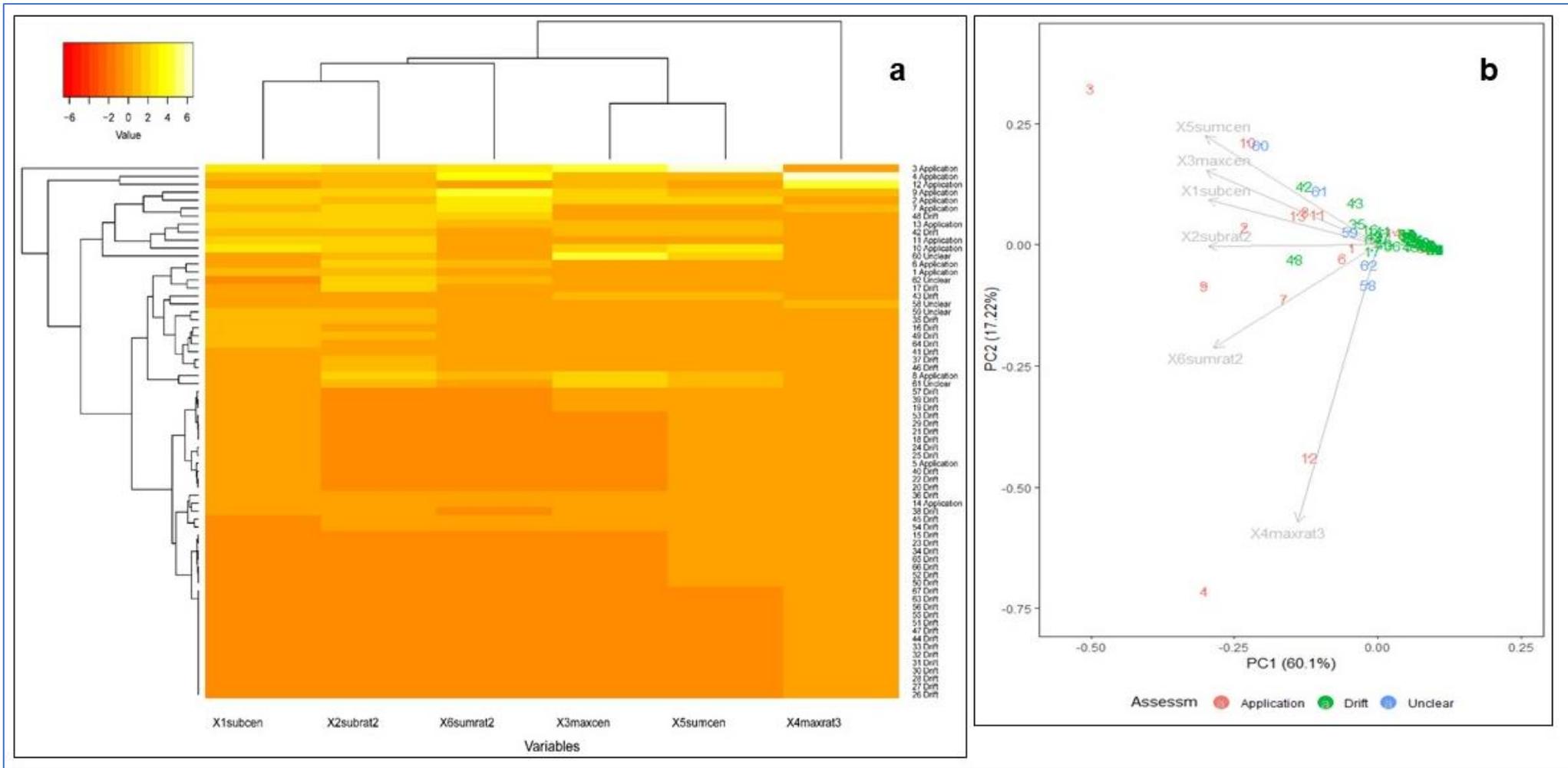


381  
 382 *Figure 5: Raw data for case 49 (see also Figure 4c), including an explanation of the four selected vari-*  
 383 *ables. A total of 5 fungicides were found in the centre, while in total 9 different fungicides were found*  
 384 *in all samples, therefore the ratio of the two (called "2subrat2") is  $5/9 \approx 0.56$ . The value 0.033 mg/kg for*  
 385 *spiroxamine is the highest figure out of the five residues found in the centre (here called "3maxcen").*  
 386 *We compare this to the highest value for spiroxamine among all samples, which is 0.041 mg/kg. The*  
 387 *ratio of the two (called "4maxrat3") is  $0.033/0.041 \approx 0.80$ . The sum of all residues from the centre is*  
 388 *0.116 mg/kg, whereas the highest sum of residues from all samples is 0.793 mg/kg. The ratio of both,*  
 389 *here called "6sumrat2", is  $0.116/0.793 \approx 0.15$ .*

390 Farms previously considered as having been subject to drift mostly clustered around zero  
 391 while application farms scattered on the left side of plot with two exceptions clustering around  
 392 zero. The farms considered unclear are distributed throughout. The raw data for the six varia-  
 393 bles were visualized using a heatmap (Figure 6a). For this, each variable was standardized  
 394 to a mean of zero and unit variance. The clustering of farms is visualized using a dendro-  
 395 gram based on the Unweighted Pair Group Method with Arithmetic means (UPGMA). The  
 396 heatmap shows that "application" farms tend to be elevated in all six variables, even though

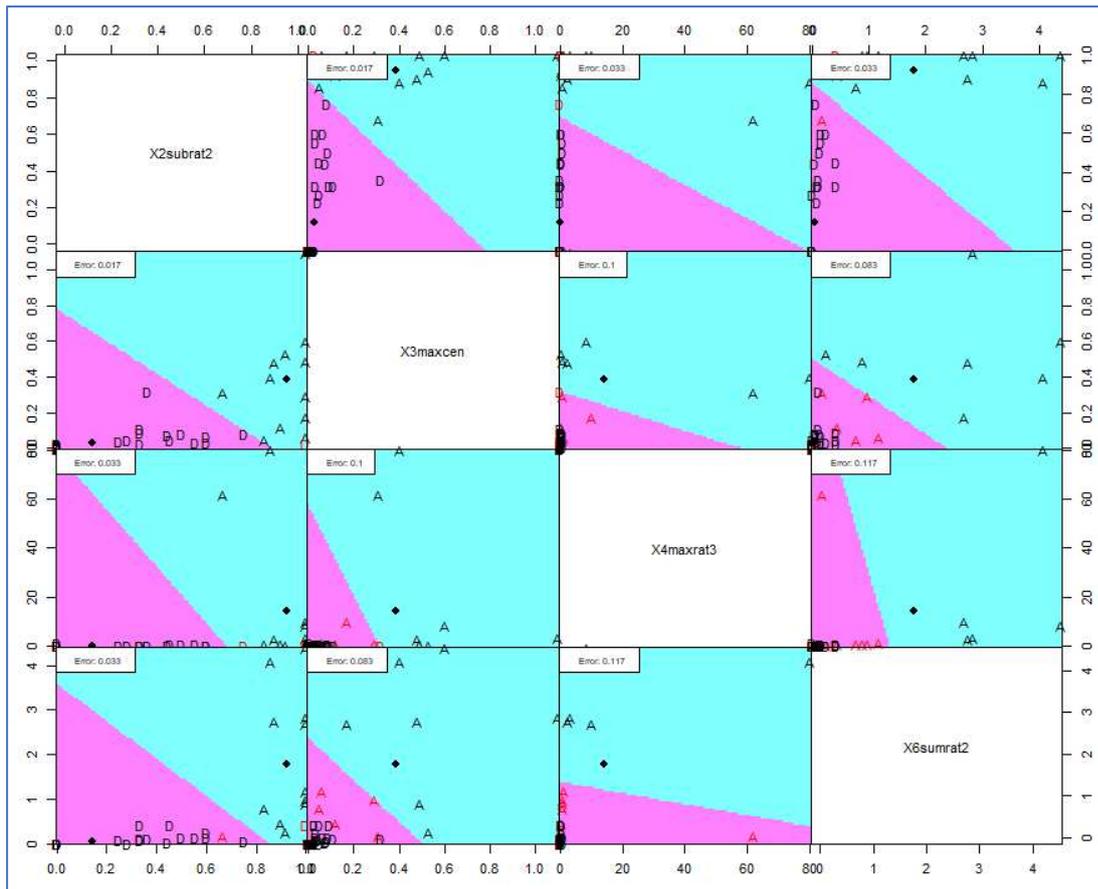
397 there is non-negligible heterogeneity within groups, confirming the one-way ANOVA results.  
398 Application farms are clustered in the top rows, showing that two farms that had been consid-  
399 ered subject to drift grouped clearly with the "applicants", whereas three supposed applicants  
400 grouped with the spray drift group. Four of the five unclear cases grouped in the application  
401 group or at the edge towards the drift group while one unclear case fell in the drift group. In-  
402 terestingly, farm 61 that groups in Figure 6b with the applicants, falls into the drift group in Fi-  
403 gure 6a. Taking a closer look at the initial raw data and sampling record for those farms,  
404 which visually in both heatmap and biplot appeared to be misclassified as "drift" (cases 42  
405 and 48), revealed that these cases should not have been included in the analysis because  
406 the field samples had been taken in a wrong way, and that the cases 5, 8 and 14 should  
407 have been classified as "drift". Thus, we subsequently re-classified the latter three cases as  
408 "drift" and the former two as "unclear", leaving a training dataset containing the 60 farms for  
409 which the class had been assigned as either "drift" or "application". The test dataset contains  
410 the five cases originally classified as "unclear" (cases 58, 59, 60, 61, 62) and the two cases  
411 subsequently removed from the test set (cases 42 & 48). The linear discriminant function  
412 performed best in terms of accuracy with the four variables 2subrat2, 3maxcen, 4maxrat3  
413 and 6sumrat2 (Figure 5 and Figure 7).

414 This linear discriminant function was evaluated by cross validation and found to correctly  
415 classify a farm as either "drift" or "application" with an accuracy of 93.3%. The leave-one-out  
416 cross validation method was used to evaluate the accuracy of the model. In this method,  
417 each sample farm was dropped from the test data and then the class of that farm was pre-  
418 dicted using the discriminant model. The misclassification rate in this cross validation of a  
419 "drift" as an "application" farm was 2.1%. This means that for a farm that is truly a "drift farm"  
420 there is an estimated probability of 2.1% that this is erroneously classified as an "application"  
421 farm. The misclassification rate of an "application" farm as a "drift" farm was estimated at  
422 25% (Figure 7). Thus, for an "application farm" there is an estimated 1 in 4 chance of being



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Figure 6: (a) Heatmap of six variables from 67 farms. The samples appear on the heatmap according to the original classification. The "application" farms are grouped at the top of plot, the "drift" farms below. The clustering of farms is visualized using a dendrogram based on the Unweighted Pair Group Method with Arithmetic means (UPGMA). (b) PCA biplot of 67 farm samples for six variables. The samples are coloured by the initial classification. The "drift" farms are clustered around (0, 0) while "application" sample farms are spread on left of the plot, and the "unclear" cases in between.



428  
 429 *Figure 7: Linear discriminant function for the four selected variables. The D represents the true “drift”*  
 430 *cases while A represents the true “application” cases. The two colours represent the decision rule:*  
 431 *cases falling into the magenta region are classified as “application”, cases falling into the turquoise re-*  
 432 *gion are classified as “drift” cases. Misclassified farms are plotted in red, correctly classified ones in*  
 433 *black.*

434 falsely classified as a “drift” farm. Of course, these estimated error rates are themselves sub-  
 435 ject to estimation error, and it is desirable to accumulate data from more farms to stabilize  
 436 these estimates, as well as the estimates of the discriminant function. It also needs to be  
 437 taken into account that, as we have explained here, there was some uncertainty regarding  
 438 correct group membership for some farms that was only revealed by closer scrutiny of the  
 439 initial statistical analysis. This may mean that the error rates we obtained in cross-validation  
 440 of the final analysis presented here are on the optimistic side. The continuation of the present  
 441 work, and especially the accumulation of data from more farms, will help to avoid such wrong  
 442 assessments in the future. Three out of the five initially "unclear" cases turned out to belong  
 443 to the "application" group, two to the "drift" group.

444 The linear discriminant function in our analysis is (See Figure 5 and Supplementary Table 2  
 445 for explanation of variables):

$$\begin{aligned}
 446 \quad & \textit{Application} = -13.63421 + 16.17447(2\textit{subrat}2) + 12.20420(3\textit{maxcen}) + \\
 447 \quad & 0.11764(4\textit{maxrat}3 + 1.5647(6\textit{sumrat}2)) \qquad \qquad \qquad (2)
 \end{aligned}$$

$$\begin{aligned}
 448 \quad & \textit{Drift} = -0.42757 + 2.76201(2\textit{subrat}2) + 0.91776(3\textit{maxcen}) + 0.00942(4\textit{maxrat}3) - \\
 449 \quad & 0.16929(6\textit{sumrat}2) \qquad \qquad \qquad (3)
 \end{aligned}$$

450  $\textit{If Application} > \textit{Drift} \rightarrow \textit{Application}$

451  $\textit{If Application} < \textit{Drift} \rightarrow \textit{Drift}$

452 The linear discriminant function is also depicted in Figure 7 for the four selected variables.  
 453 For each pair of variables, the plot shows the separation of the two groups by two different  
 454 colours, and the placement of individual samples represents the rate of correct classification.

## 455 **4 Conclusions**

- 456 1. In most cases, comparing pesticide residues in leaf samples from field margins close to a  
 457 possible source of spray-drift, to samples from the centre of the organic field, allows to  
 458 distinguish the effects of spray-drift from deliberate pesticide use by the organic farm.  
 459 The method works even in regions with extremely intensive pesticide use and aerial  
 460 spraying by conventional neighbours.
- 461 2. The distinction is also possible when it comes to very small fields, where the distance be-  
 462 tween border and centre is short – provided that manual knapsack (as is normally the  
 463 case in smallholder setups) or tractor boom sprayers are used. It becomes difficult to im-  
 464 possible on such small fields, when neighbours use air-blast or aerial spraying.
- 465 3. When residues below approximately 0.03 mg/kg are found evenly spread over the field, it  
 466 becomes difficult to distinguish long-range drift (from evaporation or wind erosion) from  
 467 the results of deliberate use several weeks before sampling. In such cases, the test re-  
 468 sults alone do not allow to prove fraudulent practices, as long as other evidence (pesti-  
 469 cide containers in the farm house, residues in rinse water in the sprayer, records, etc.) do  
 470 not exist.
- 471 4. Following strict sampling protocols and keeping detailed records are the key for using this

472 method in a meaningful way. Sampling must be planned in a way that allows for clear in-  
473 terpretation of results. Taking only one sample from a field, often leads to useless results.  
474 Sampling residues in spraying equipment, cross-checking with book-keeping records and  
475 other inspection methods, should be used as complementary methods.

476 5. A weak point of our survey of the 67 banana farms is that some of the centre samples  
477 were not taken at sufficient distance from the edges. This has meanwhile been corrected  
478 through improved work instructions (Supplementary Fig. 5). Another correction of the pro-  
479 cedure, which is currently being tested, is reduction of the "action level" for separate test-  
480 ing of centre and border samples from 0.1 to 0.06 mg/kg. Once a substantial number of  
481 test results under this new protocol have been obtained, other variables from Supplemen-  
482 tary Table 2 might perform better, e.g. N° 7 through 15.

483 6. When a reference sample from the field margin is not available, and residues are high in  
484 the central part of the organic farm, comparing the test results to expected values from  
485 standard deposition curves, can be enough to distinguish drift from application.

486 7. For the specific conditions of aerial fungicide spraying in the banana industry, the varia-  
487 bles explained in Figure 5 and a linear discriminant function such as the one outlined  
488 above can be used tentatively for differentiating drift from application. We suspect that  
489 the same method can be used for other crops exposed to heavy drift pressure (e.g., fruit  
490 orchards and vineyards), but this is yet to be confirmed.

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492 contributed the statistical part. M.R. Finckh conducted a thorough review and improved the  
493 article's consistency. M. Mittelhammer and D. Stempel selected some of the case studies  
494 and made the initial decision for the banana farms. J. Jaschik prepared the organic vs. con-  
495 ventional test results from the Eurofins database. J. Neuendorff contributed data from the  
496 GfRS archive. J. Mancheno, L. Melo, L. Guamán, R. Gangahuamín, J.C. Ullauri and O.  
497 Pavón were in charge of the sampling from the banana farms.

498 **Additional Information**

499 The authors declare no competing interests.

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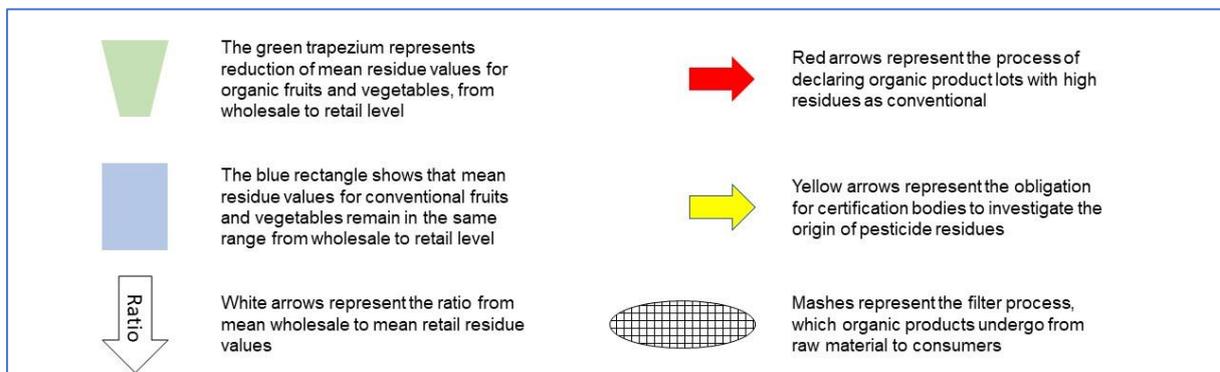
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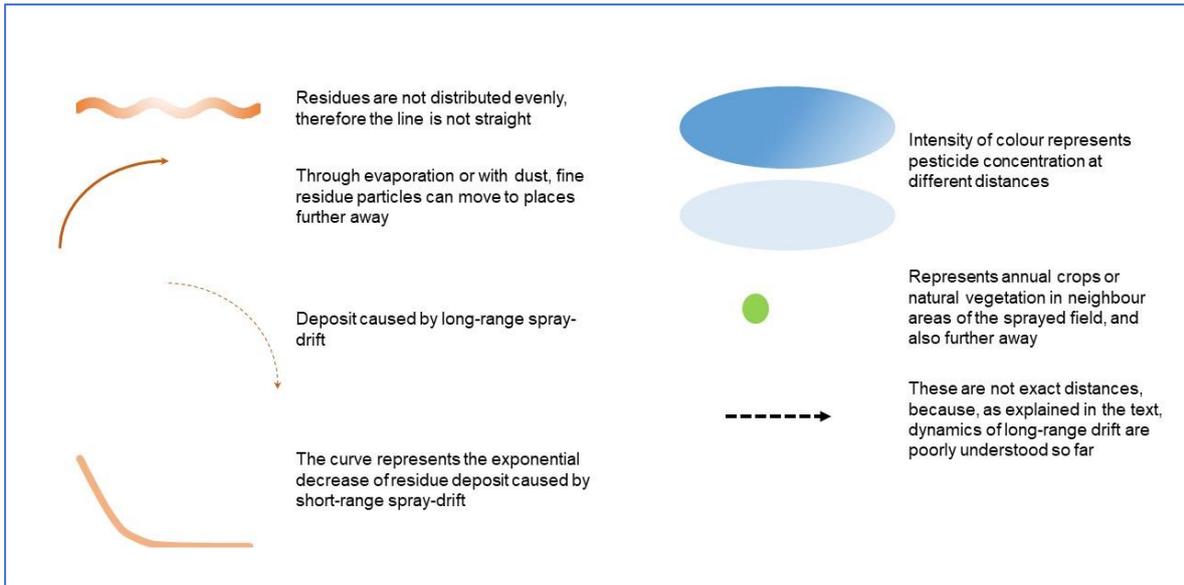
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646 **Legends**

647 Figure 1:

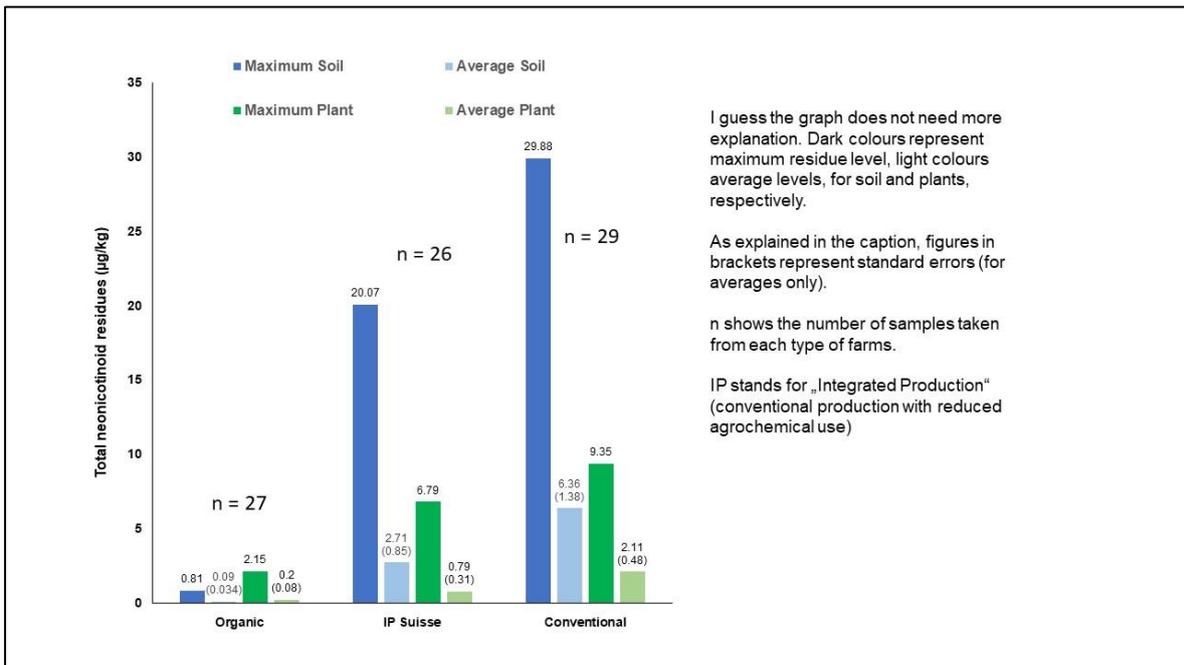


649 Figure 2:



650

651 Figure 3:

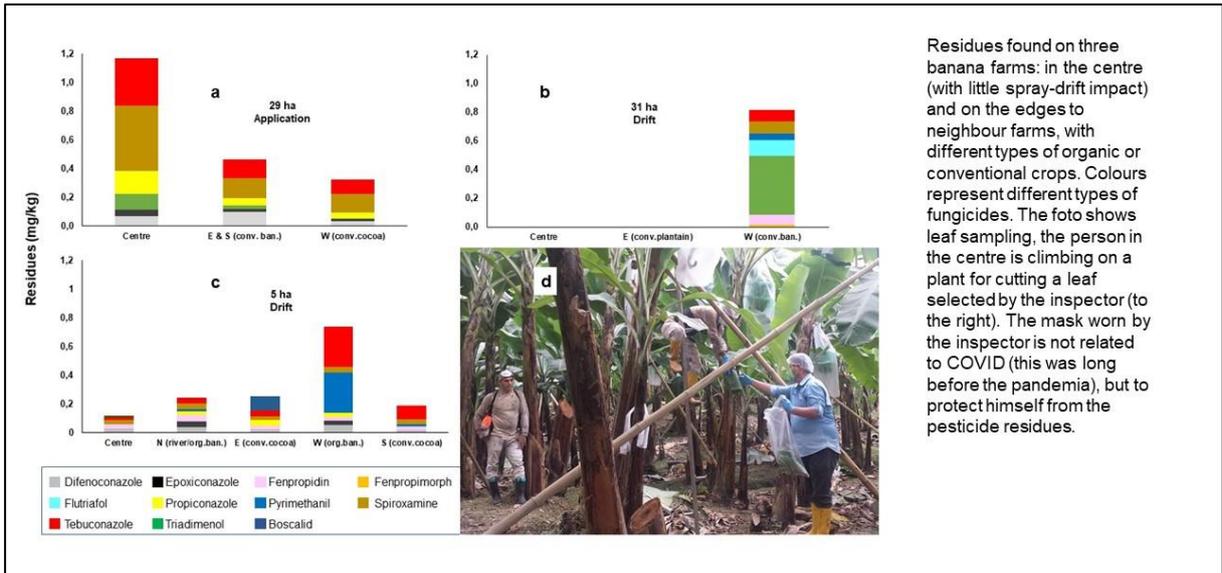


652

653 Table 1:

654 (No need for a legend)

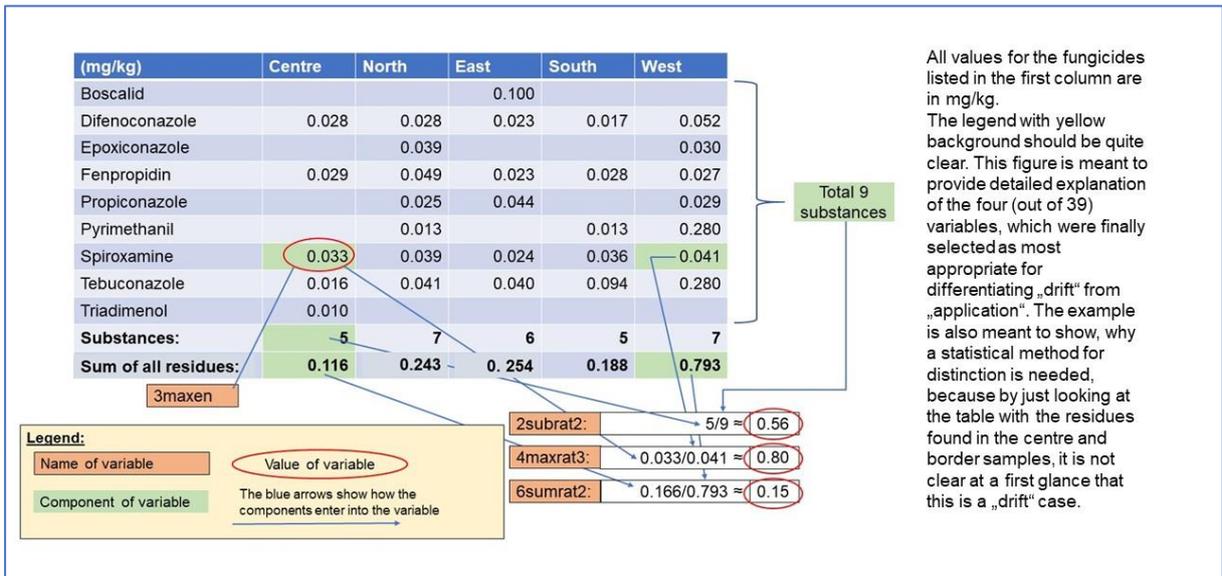
655 Figure 4:



Residues found on three banana farms: in the centre (with little spray-drift impact) and on the edges to neighbour farms, with different types of organic or conventional crops. Colours represent different types of fungicides. The foto shows leaf sampling, the person in the centre is climbing on a plant for cutting a leaf selected by the inspector (to the right). The mask worn by the inspector is not related to COVID (this was long before the pandemia), but to protect himself from the pesticide residues.

656

657 Figure 5:



All values for the fungicides listed in the first column are in mg/kg. The legend with yellow background should be quite clear. This figure is meant to provide detailed explanation of the four (out of 39) variables, which were finally selected as most appropriate for differentiating „drift“ from „application“. The example is also meant to show, why a statistical method for distinction is needed, because by just looking at the table with the residues found in the centre and border samples, it is not clear at a first glance that this is a „drift“ case.

658

659 Figure 6, 7 and 8:

660 Refer to captions

# Figures

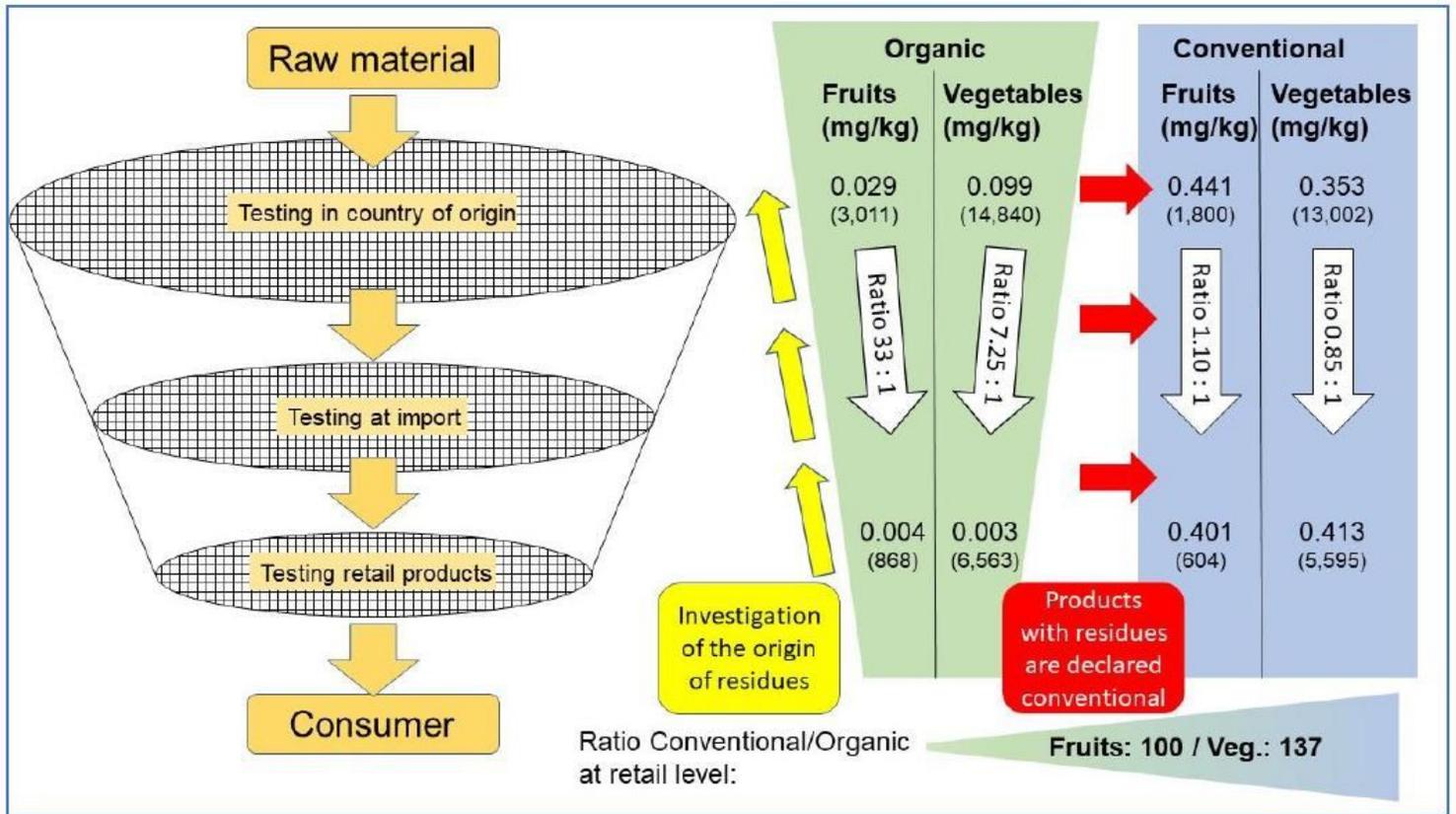


Figure 1

Due to technical limitations, the figure caption is only available in the manuscript file.

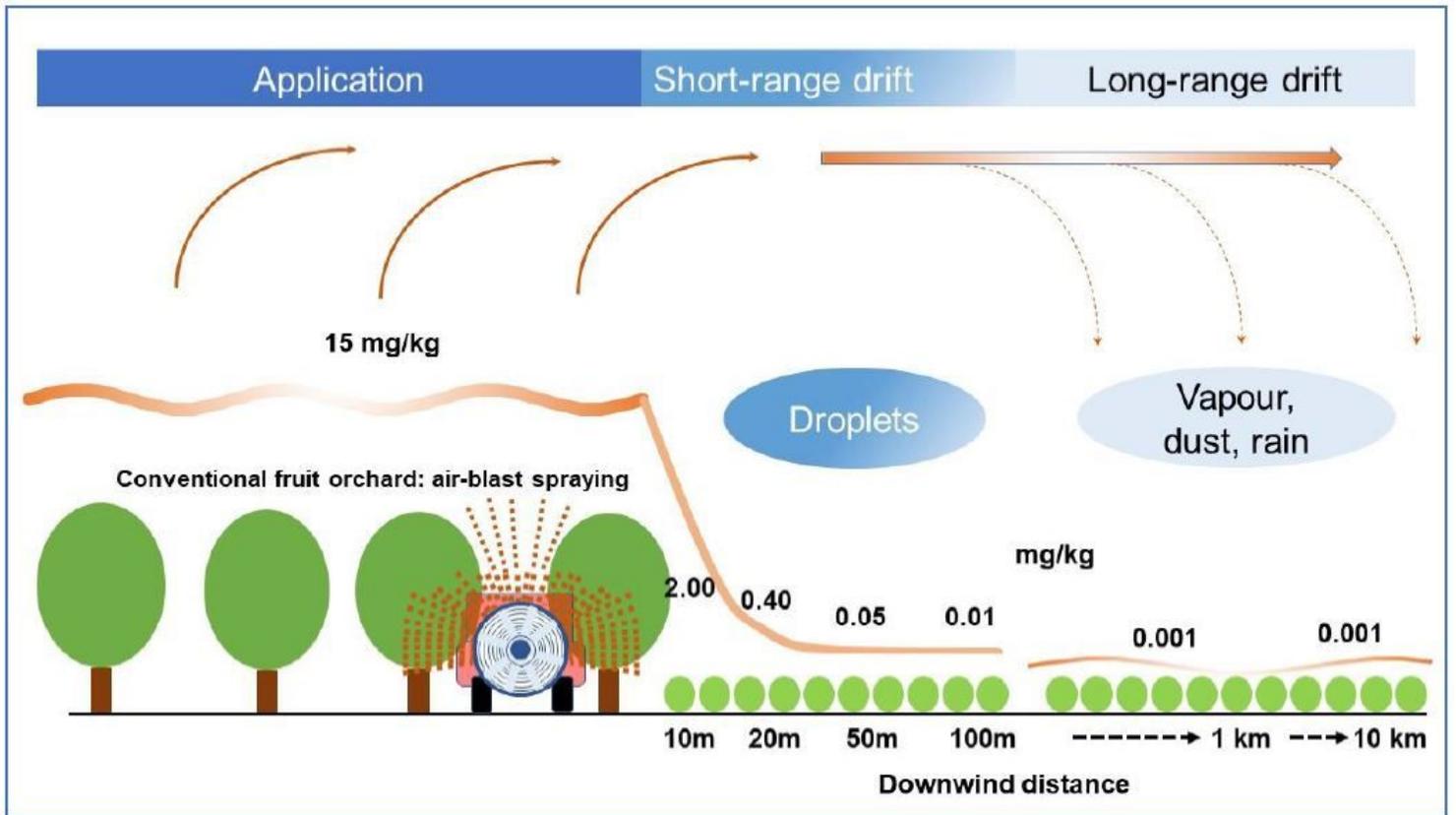


Figure 2

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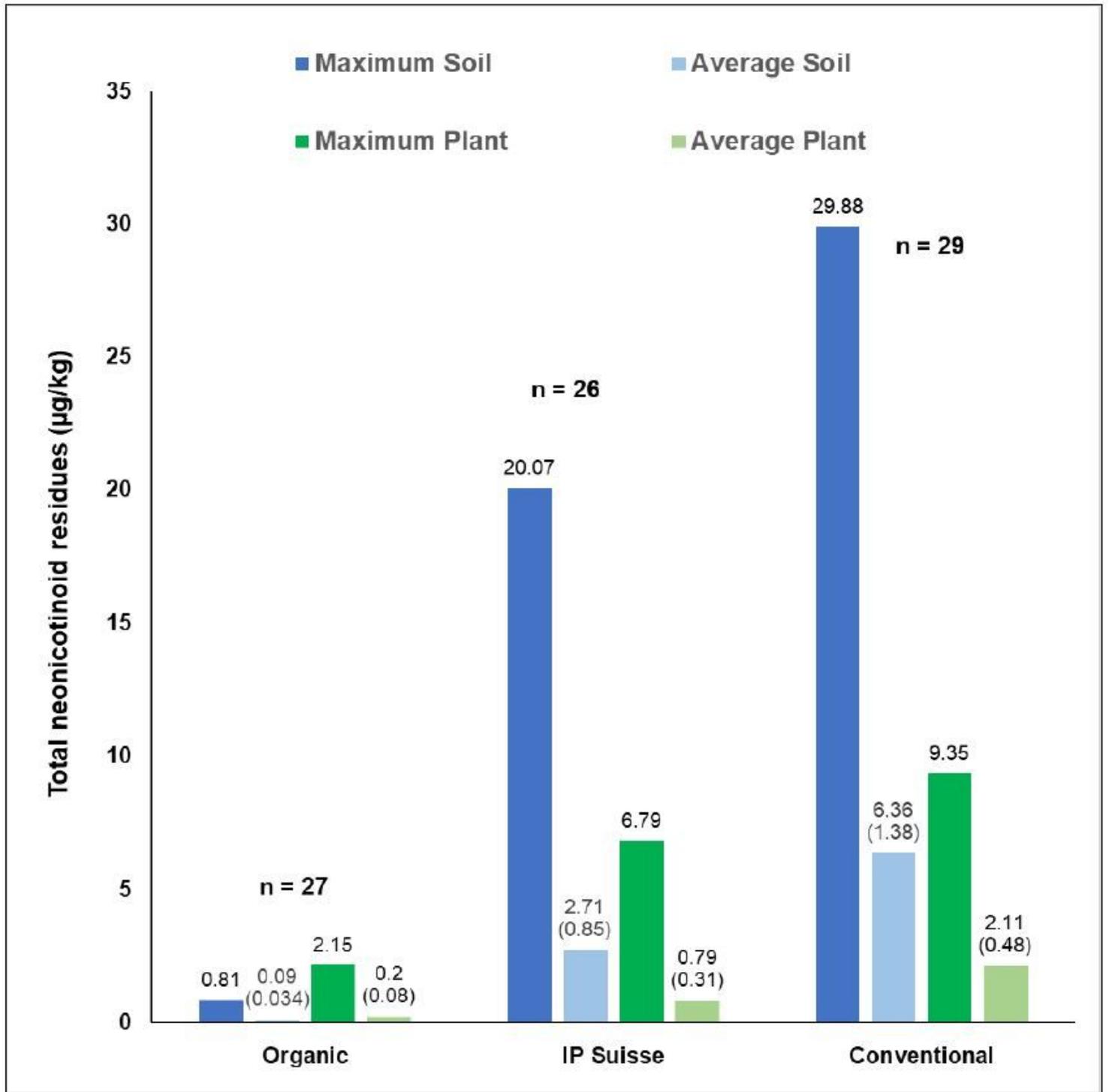
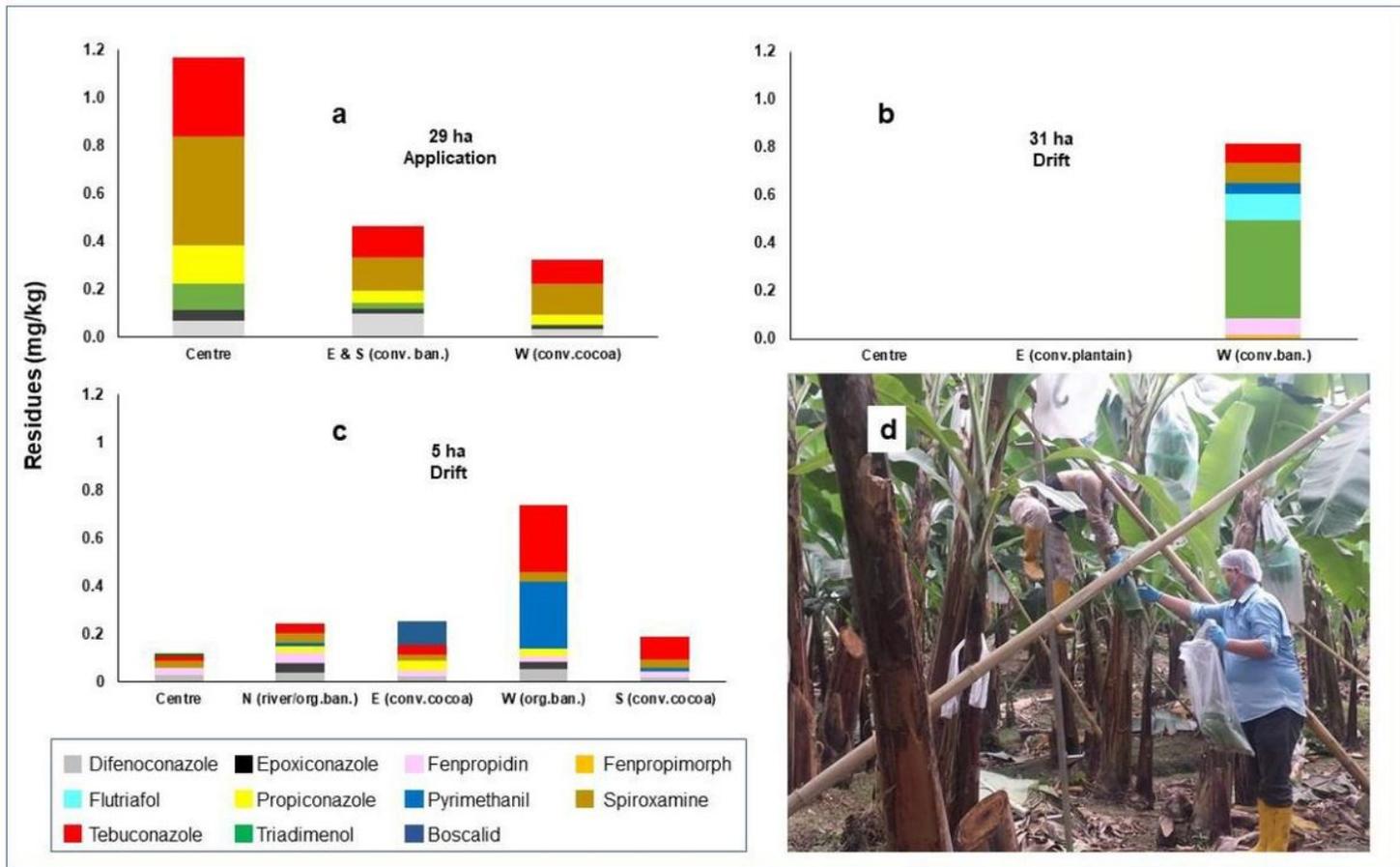


Figure 3

Due to technical limitations, the figure caption is only available in the manuscript file.



**Figure 4**

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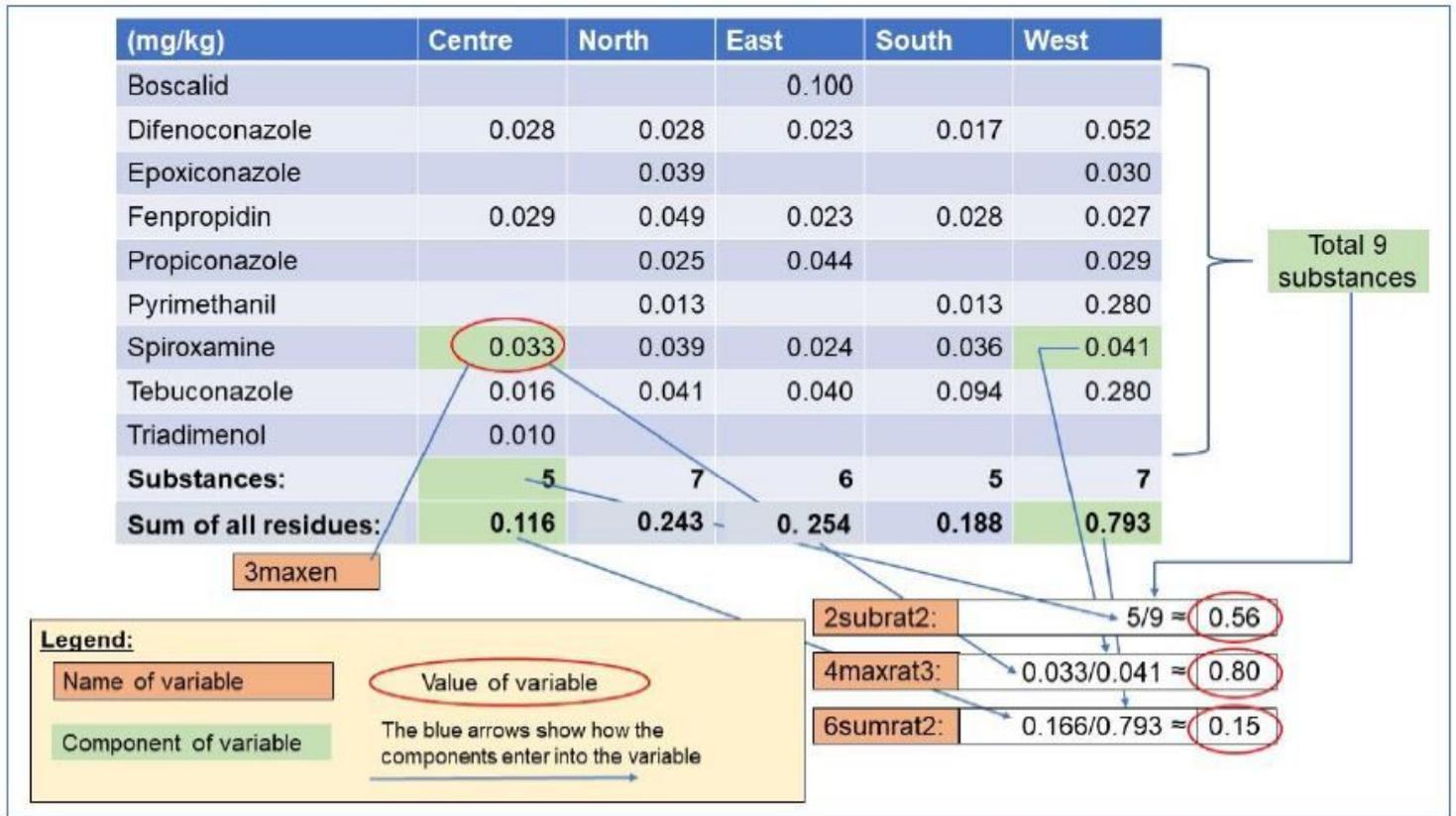


Figure 5

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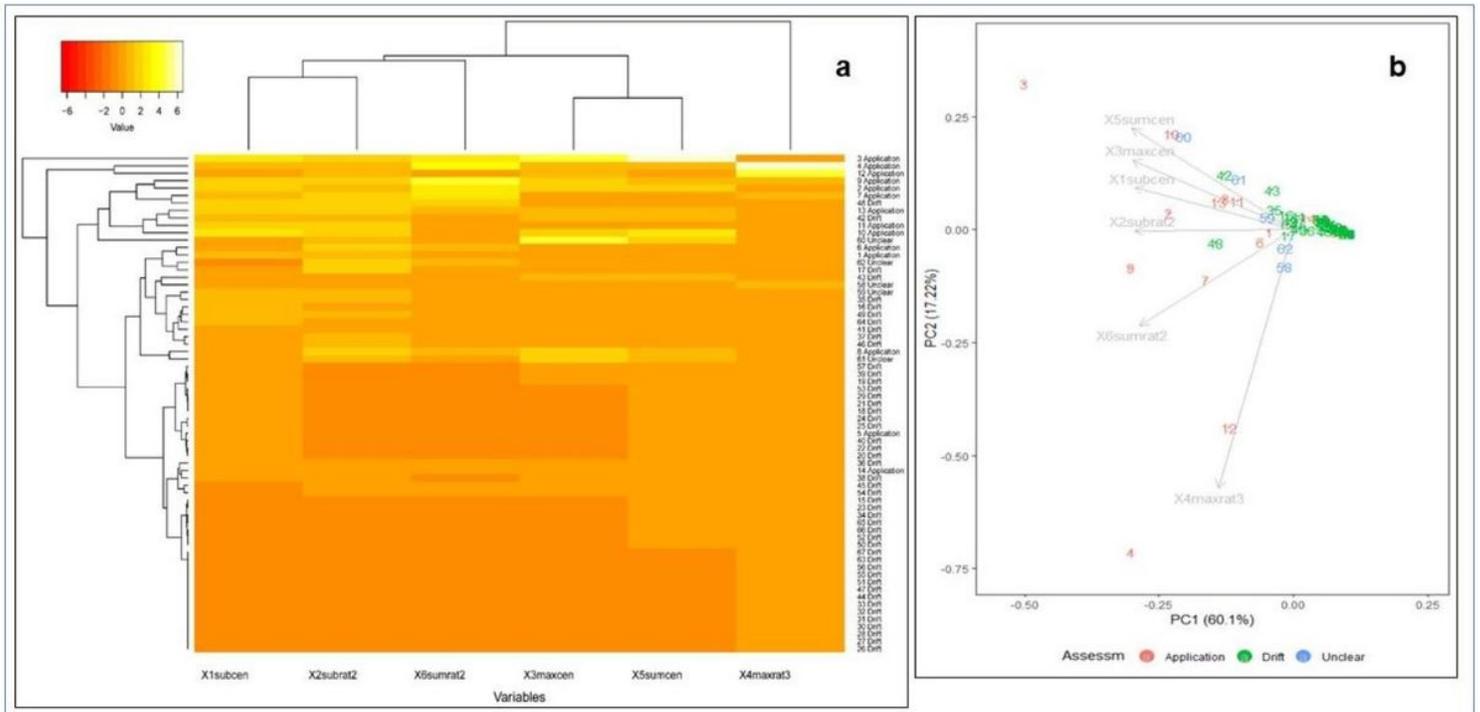
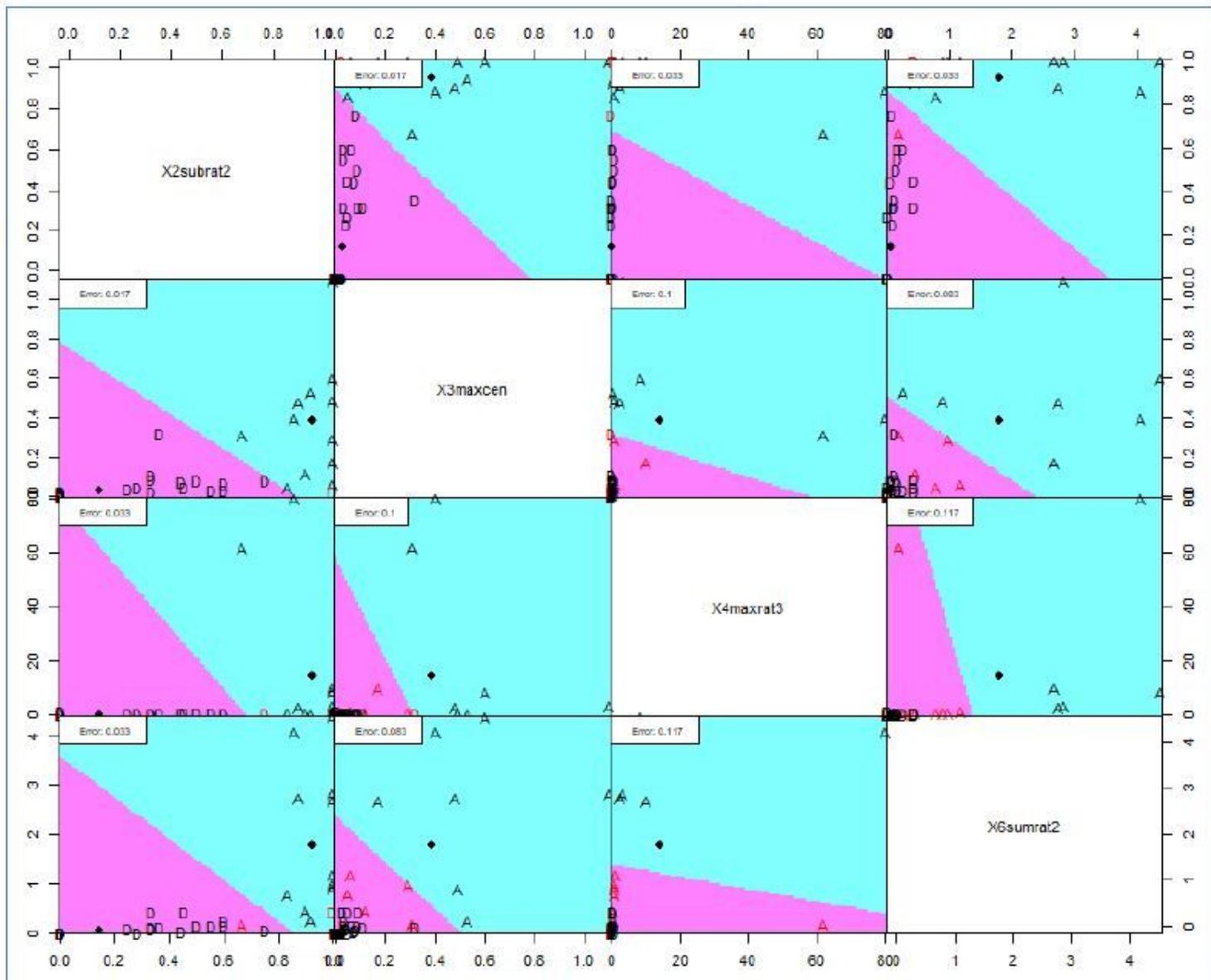


Figure 6

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**Figure 7**

Due to technical limitations, the figure caption is only available in the manuscript file.

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- [SupplementaryDatasetVariablesonly.xlsx](#)
- [SupplementaryDatasetVariablesonly.xlsx](#)
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