PESTICIDE POLICY

1. Introduction

Pesticides can be an essential tool in the economic production of food and Waitrose seeks to promote the responsible use of phytosanitary products and recognises the potential risks involved to human health, the environment and biodiversity from crop protection practices, as well as wider public concerns. Waitrose seeks to minimise the risks of using pesticides within its grower base

2. Scope

The following products are within scope of this policy:

- Waitrose branded fresh produce (fruit, vegetables, salad)
- Waitrose branded plants and flowers
- Waitrose branded prepared fruit and vegetables
- Waitrose branded frozen fruit and vegetables

This policy must read in conjunction with Policy 50033A Waitrose Pesticide Management Scheme Manual

3. Interpretation

This policy document has been produced by the Regulatory, Technical Team and Ethics & Sustainability Teams at Waitrose. The content is not intended to remove the need for suppliers to develop and maintain knowledge of the regulatory framework for food safety and good agricultural practices, but where a difference in interpretation exists; the requirements in this document must be applied.

4. Policy Purpose

The purpose of this policy is to ensure that pesticides are used on a rigorous risk assessed basis. It sets out lists of prohibited and 'watch out' pesticides, and the requirements for risk assessments for the use of all pesticides.

5. Policy Requirements

5.1. Regenerative agriculture; Waitrose has committed to transitioning all of its British suppliers to regenerative farming practices by 2030. Driven by its Farming for Nature

programme, the initiative is built on six foundational principles designed to restore nature while ensuring long-term financial resilience for farmers:

1. Understanding farm context.
2. Minimising soil disturbance. Note: Soil disturbance also includes minimising chemical disturbance from artificial fertilisers and pesticides.
3. Maximising plant diversity.
4. Maintaining living roots.
5. Keeping the soil covered.
6. Integrating livestock, where appropriate.

This policy supports Waitrose's ambition to transition its food supply chains to a regenerative and resilient food system by reducing chemical disturbance to soils and biodiversity.

Further information can be found on our Farming for Nature website; Waitrose Farming for Nature and John Lewis partnership Farming for Nature

5.2. Pesticides are permitted to be used as part of an Integrated Pest Management (IPM) strategy for each crop in conjunction with alternative control measures to avoid excessive pesticide usage. These include; resistant varieties, appropriate cultural methods, promoting soil health and plant health, biological control methods and non pesticide interventions throughout the life cycle of the crop.

5.3. Where pesticides are to be used, suppliers of fresh fruit, salads or vegetables, and plants and flowers must conduct a risk assessment on the appropriate use of pesticides. The risk assessment must include risks to:

- The operator
- The environment
- Biodiversity
- Third parties, such as neighbouring properties, general public, public footpaths.
- The consumer
- Residues being present in the final product

5.4. Waitrose recognises the value of third party accreditation schemes such as Red Tractor (UK), GLOBALGAP, LEAF Marque, OHSAS (Horticulture) or equivalent schemes in encouraging good agricultural practices in managing, handling and applying pesticides. All requirements for third party accreditation for growers are set out in Waitrose Policy 50204 and Waitrose Policy 50030

5.5. For crops grown in the UK, only pesticides that are authorised for use in the UK, with associated maximum residue limits (MRLs) are permitted to be used. For crops grown outside the UK local legislative requirements must be met regarding the authorisation of pesticide usage. Pesticides which are authorised in the country of origin are permitted provided that there is an MRL laid down in UK legislation and the other provisions of this policy are met.

Care must be taken to ensure that any potential risks of pesticide residues in food products are reduced or eliminated. Measures taken to eliminate the risk of pesticide residues can include; pesticide selection, the use of non pesticide alternatives, timing and method of application and time between application and harvest.

5.6. We are committed to phasing out Highly Hazardous Pesticides (HHP's) and we have engaged with academics and independent experts to assess all pesticides that could potentially be used on our crops. These have been categorised by risk into three groups:

- Black Group: Prohibited from use on crops grown for Waitrose
- Red Group: Must be risk assessed with a plan for ultimate removal from cropping systems
- Amber Group: Pesticides of concern that are being monitored by Waitrose. Growers must be aware of any risks prior to usage

5.7. Proposed Pesticide Lists for fresh produce crops, by grower (or grower group if applicable) must be uploaded onto the Waitrose Supplier Approval Platform prior to the start of the cropping season. The Proposed Pesticide list must reference pesticides likely to be used on the crop based on actual historical usage and new developments in crop protection. It must not be a list of all approved products for that crop in the country of origin.

5.8. The neonicotinoid insecticides Imidacloprid, Clothianidin, Thiacloprid and Thiamethoxam have been identified as being potentially harmful to bees and must not be sprayed on flowering crops that are attractive to bees. This includes plants or flowers grown to be marketed as 'pollinator friendly'. Any pesticide classed as toxic to bees must not be applied whilst crops are flowering or deemed attractive to bees and other pollinators.

5.9. There is widespread concern regarding the usage of antibiotics in agriculture and the potential increase of resistance to human pathogens in widely used antibiotics. The antibiotic products Gentamicin, Oxytetracycline and Streptomycin have been

identified as having potential usage in fresh produce and are also classified as critical or highly important antimicrobials. Therefore these products have been placed on the Red list. Kasugamycin, an antibiotic with potential agricultural use, is not listed as critical or highly important and has been placed on the Amber list.

5.10. The Waitrose Pesticide lists fully take into account the risk profiles of pesticides in terms of risks to human health, environmental fate, risks to biodiversity and pollinators, and likely risks of excessive residues remaining in products. The Waitrose policy also fully takes into account published data such as the Pesticide Action Network (PAN) Highly Hazardous Pesticide (HHP) List, all pesticides listed on the PAN HHP list have been incorporated into our Banned, Restricted or Monitored Lists.

5.11. PFAS (Per- and polyfluoroalkyl substances) or so called 'forever chemicals' have caused widespread public concern over recent years. Their strong carbon-fluorine bonds make them extremely resistant to natural breakdown in the environment. Pesticides are thoroughly tested for toxicity to non-target species and for their degradation in the environment as part of their approval process. However Waitrose has taken a precautionary position on the chemicals and pesticides that are also PFAS chemicals have been fully accounted for included in our restricted lists.

6. Policy Implementation

6.1. Suppliers of fresh produce must follow the guidelines detailed in the Fresh Produce Consortium Code of Practice for the Control of Pesticides for Produce Marketing Organisations 10th Edition 2017 for handling and managing pesticides and pesticide information in the supply chain.

6.2. Suppliers and growers must review current and proposed pesticide usage to ensure Waitrose restricted lists are taken into account as well as all legal, due diligence requirements. Suppliers and growers must review pesticide usage on at least an annual basis, in line with the procedure laid out in Waitrose Pesticide Management Scheme Manual. Pesticide usage reviews should take into account;

- Pesticides currently in use.
- Pesticide residue data and any MRL changes.
- Any changes to cropping systems or supply base.
- Any likely pesticide legislative restrictions.
- New pesticides that have been made available.
- Any alternative control measures being developed.
- Further implementation of Integrated Pest Management (IPM) and Integrated Crop Management (ICM) techniques that promote plant health and vigor,

reduce pest presence and activity, and increase plant tolerance or resistance to pest damage.

The above list is not exhaustive. Results of pesticide reviews are to be recorded and presented to Waitrose as part of scorecard meetings on an annual basis.

Category	Use	Further Requirements
Black	Prohibited	Prohibited from use on crops grown for Waitrose
Red	Must be removed from cropping systems	If removal is not immediately possible, risk assessment is required according to 6.3 and must include an elimination plan. **Waitrose targets a 5% per year reduction in the numbers of Plant Protection Product Lists (PPPL's) containing Red List pesticides**
Amber	Pesticides on Waitrose 'monitored list'. To be avoided where possible	Where it is unavoidable, the supplier must ensure usage minimises risk and record usage by country, grower and crop type These pesticides may be subject to further restrictions in the future as new data becomes available.

6.3. The Waitrose Black, Red and Amber list of chemicals of concern does not take precedence over any local, national or international legislation or recognised codes of practice whether pre-existing or subsequently introduced.

6.4. Further to the prohibitions laid out 5.8, any other application of these pesticides must be subject to a detailed risk assessment and submitted to Waitrose where the effect on bees must be demonstrated to have been minimised or eliminated by the timing of application, the exclusion of bees from the crop or the application method. In line with current legislation, there are no restrictions on the use of these insecticides in non-bee attractive crops. However as with all insecticides best practice must be followed.

6.5. Waitrose aims to avoid pesticide residues in food. Occurrences of pesticide residues detected in the Waitrose Pesticide Residue Surveillance program must be investigated by the supplier if they are;

- Above the Maximum Residue Level (MRL)
- Above 50% of the MRL
- 5 or more residues detected in a sample
- Unapproved usage of pesticides
- Detections of Waitrose Black List pesticides

Results of those investigations and corrective actions must be shared with Waitrose. Investigations must be completed within the timescales specified on our dedicated pesticide surveillance website. (for further details see Policy 50047).

For serious Out of Specification detections a closing meeting must be held with the supplier and representatives from Waitrose to sign off the investigation and corrective actions

6.6. Waitrose has a transparent policy on its management of pesticides within its Fresh Produce supply base. The Waitrose Pesticide Policy, the Black, Red and Amber lists, and the results of our Pesticide Residue Testing Programs, including interpretation of results and actions taken for any exceedances are published in the appropriate section of our website.

7. Accountabilities and Responsibilities

This Policy has been created by the Waitrose Technical Policy Framework, who have ensured that it is consistent with the Partnership Constitution and applicable regulatory requirements. This document will be reviewed annually.

8. Monitoring of Controls

This policy will be monitored via the Waitrose nominated supply database. Waitrose Technical Partners are responsible for ensuring compliance to this policy.

9. Assurance

Assurance on the effective operation of the Policy will be provided to the Waitrose Technical Policy Steering Group at least annually.

10. Derogations

Derogations to this policy may be applied for according to the John Lewis Partnership Derogation - Policy 30001

11. Further Information

UK Pesticide Database MRLs

EU Pesticide Database MRLs

CODEX Pesticide Database MRLs

PAN International List of Highly Hazardous Pesticides

Waitrose Farming for Nature