

PROJECT SHEET

SUBCOMMITTEE: Food Residue

PROJECT TITLE: **Trade Irritant Resolution**

PROJECT ID: FR01-97-1005

PROJECT TEAM: United States: Debbie Edwards
Canada: Ariff Ally
Mexico: Marco Cotero

INITIATION: April 1997

UPDATE: June 2006

GOAL: To resolve identified trade irritants and improve process for identification and resolution of trade irritants.

PROJECT DESCRIPTION:

In cooperation with a multi-stakeholder group, a guidance document on the identification and resolution of trade irritants was released in April 1998, which was entitled *Procedures for the Identification and Resolution of NAFTA Pesticide Trade Irritants*. A revised version of this document was released in December 1998.

The guidance document identifies five categories of trade irritants, defined as follows:

Category A—a discrepancy arising when an MRL/tolerance has been established in the exporting country, but it is lower or does not exist in the importing country, and the commodity has been documented to be out of compliance in the importing country;

Category B—a discrepancy arising when an MRL/tolerance has been established in the exporting country, but it is lower or does not exist in the importing country, and there have been no compliance violations;

Category C—a pesticide-commodity combination is registered in one country, but not a second country, while the commodity growers in the second country want to treat their commodity with that pesticide;

Category D—a discrepancy resulting from a non-registered use in the exporting country; and

Category E—a registered use with a time-limited tolerance in the exporting country.

The Participants involved in drafting the process document were:

MEMBERS OF THE TRADE IRRITANT PROCESS TEAM	
<p>Allan Brown, Crop Protection Institute Tobi Colvin-Snyder, United States Environmental Protection Agency (EPA) Lawrence Hall, United States Department of Agriculture (USDA) Jose Laborde, Guanajuato Ministry of Agriculture Javier Morgado Gutiérrez, Ciba Mexico Amada Vélez Méndez, Secretaría de Agricultura, Ganadería y Desarrollo Rural Douglas Mutch, Canadian Grain Council (CGC)</p>	<p>Bill Murray, Health Canada's Pest Management Regulatory Agency (PMRA) Klaus Neverman, AMIFAC Karen Pither, American Crop Protection Association Claire Regan, Grocery Manufacturers of America Edward Ruckert, Minor Crop Farmers Alliance Kim Meegan, Canadian Federation of Agriculture (CFA) Donald Stubbs, United States Environmental Protection Agency (EPA) Stephen Whitney, Canadian Produce Marketing Association (CPMA) / Canadian Horticultural Council (CHC)</p>

Several Category A irritants have been identified and subsequently resolved by the NAFTA TWG Food Residue Subcommittee. At the December 2002 full meeting of the NAFTA TWG, interested parties were invited to identify additional candidates for trade irritant resolution.

Growers have indicated that harmonization of MRLs/tolerances across the NAFTA countries is a priority. In response, the TWG developed and implemented several projects to address this concern. Under the Food Residue Subcommittee, the TWG is pursuing a project entitled "Analyzing MRLs" to systematically analyze the MRL setting process in both Canada and the United States to ensure a harmonized approach. As a joint effort by the Risk Reduction and Food Residue subcommittees, the TWG is exploring a pest-based, commodity specific approach for addressing trade irritants while promoting risk reductions for pulse and tomato crops.

Based on the lessons learned from these other TWG activities, the Trade Irritant Resolution project will be reviewing the existing guidance document and proposing process improvements, where appropriate. The TWG does not anticipate undertaking this review until such time as sufficient progress is made in the other areas, particularly the pulse and tomato pilot projects.

At the June 2004 Executive Board Meeting and December 2004 Stakeholders Meeting, progress was described, including priorities from the pulse growers for MRL/tolerance trade irritant resolution. Mexico noted that they are not involved to any extent in pulse exports. With respect to the tomato project, the Risk Reduction and Food Residues subcommittees sent a letter to tomato growers summarizing TWG efforts and requesting an expression of interest in pursuing this project. In October 2004, the North American Tomato Trade Working Group (NATTWG) reconfirmed their interest in the project, and subsequently identified their top three priorities to work on with the governments. Progress has been made towards resolving those initial priorities/potential trade barriers/irritants submitted, and additional priorities are expected. In the meantime, the TWG is committed to working with users as they identify important MRL discrepancies and is working with industry to address these MRL discrepancies in a cost-effective and sustainable manner. Potato grower organizations in Canada and the United States have approached the governments and are working towards a proposed commodity project for potatoes as well. The TWG will also continue to harmonize MRLs as part of existing and future joint reviews and work shares as much as possible.

WORKPLAN

GOAL	ACTIVITIES	TIME FRAME
To resolve identified trade irritants.	TWG (area of cooperation) To work with users as they identify important MRL discrepancies and work with industry to address these MRL discrepancies in a cost-effective and sustainable manner. To continue to facilitate the harmonizing of MRLs for pesticides that meet the joint submission criteria and reviewed jointly and simultaneously in the NAFTA countries.	2003–2007
To improve the trade irritant identification and resolution process.	Review and revise, as appropriate, the December 1998 guidance document based on lessons learned from other TWG projects, particularly the pulse and tomato pilot projects.	2006–2007