

# Revocation of 0.1 ppm as a General MRL for pesticide residues



Health  
Canada

Santé  
Canada

# O.1 GMRL Briefing

## *Roadmap:*

- ▶ Overview of the GMRL
- ▶ Rationale for proposed change
- ▶ Outline of the proposal

# Background to MRL's

Maximum Residue Limits (MRL) are:

- ▶ The maximum residues that are likely to remain in or on the food at the farm gate when the pesticide is used according to label directions. This amount is then legally established as a maximum residue limit (MRL) under the *Food and Drugs Regulations* or under the new *Pest Control Products Act*.

# FDR DIVISION 15 - Adulteration of food

- ▶ MRLs established for a specific pesticide-commodity in Table II of Division 15, Food and Drug Regulations
- ▶ All other agricultural chemical residues are regulated by B.15.002(1) - not to exceed 0.1 ppm or food is considered to be adulterated.

# Rationale to support revocation (1)

- ▶ Intent was to prohibit adulteration of food – not being accomplished
- ▶ Impacts generation of refined dietary risk / exposure estimates
  - ◆ by virtue of the GMRL residues allowed on all imported foods up to 0.1 ppm
  - ◆ difficult to refine assessments driven by potential residues on imports

# Rationale to support revocation (2)

- ▶ Current food residue surveillance programs can quantify well below 0.1 ppm
  - ◆ GMRL establishes the level of enforcement at 0.1 ppm.
  - ◆ No violation unless quantifiable residues are detected above 0.1 ppm
  - ◆ Difficult to prohibit residues

# Rationale to support revocation (3)

- ▶ No U.S. equivalent:
  - ◆ Canadian growers are at a disadvantage
- ▶ Most industrialized countries set specific MRLs for every pesticide on each food commodity
  - ◆ PMRA does the same for new uses since 1998
  - ◆ GMRL still applies for existing domestic uses and for import
- ▶ GMRL not recognized by trade partners as legitimate
  - ◆ impact to Canadian exporters

# Proposal to revoke the GMRL

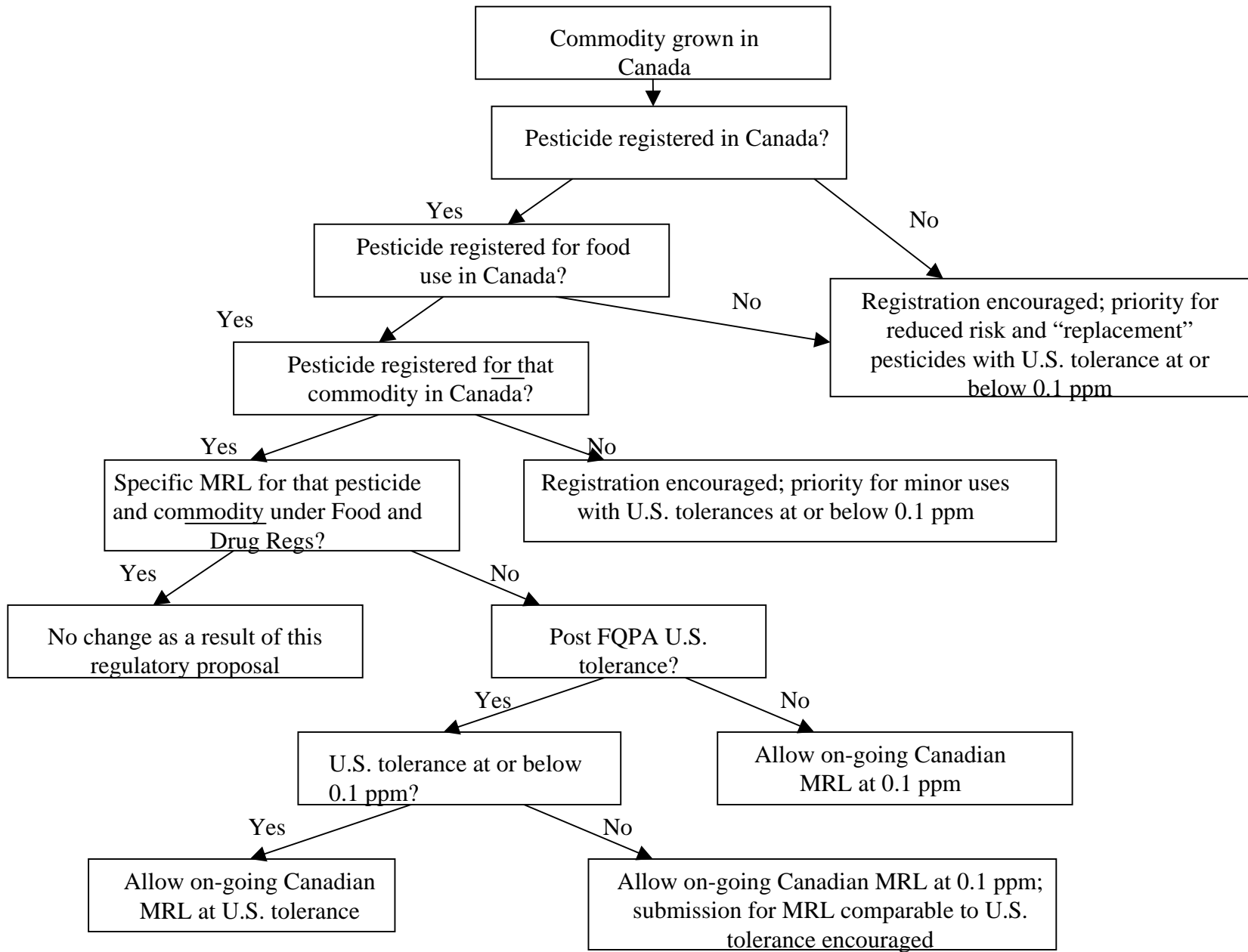
## ► Objective:

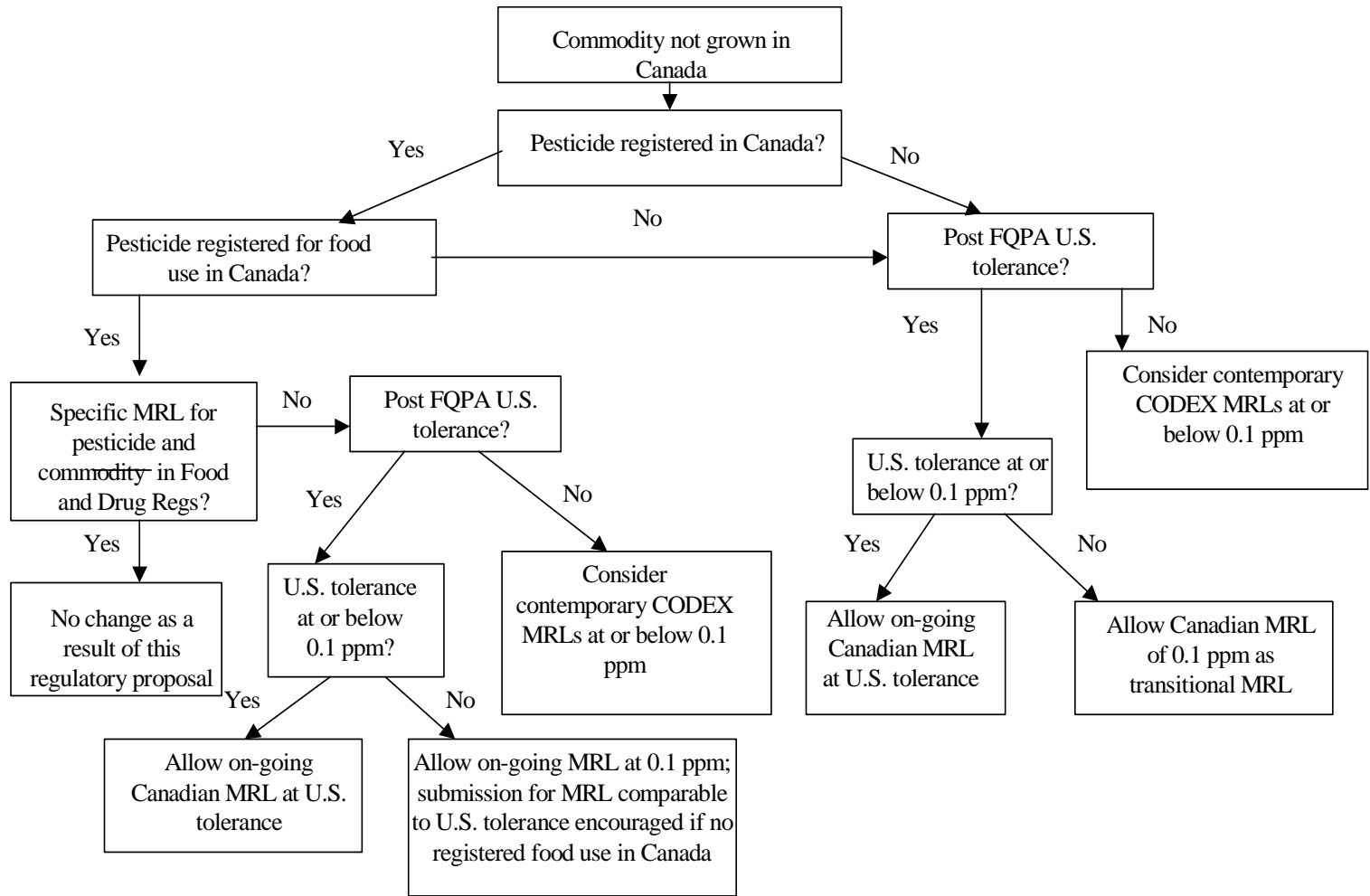
- ◆ Achieve the intent of the General MRL, to prohibit food that is adulterated because MRLs are exceeded or have not been established.
- ◆ Maintain the safety of the Canadian food supply.
- ◆ Facilitate trade and minimize the impact on:
  - existing registered Canadian food uses by continuing to allow residues on foods that result from the legitimate use of registered pesticides.
  - trade through harmonization in a number of areas, and avoiding new trade irritants.



# Refined proposal

- ▶ Use of U.S. tolerances at or below 0.1 ppm, post FQPA as the basis for specific Canadian MRLs. Also consider contemporary CODEX MRLs at or below 0.1 ppm
- ▶ Transitional MRLs only in limited circumstances.
- ▶ Continued consideration of the needs of Canadian growers - commodities grown in Canada considered separately from imports
- ▶ Detailed comparison of Canadian pesticide-commodity pairs affected by revocation of the General MRL, with U.S. tolerances.





# General approach in developing proposal

- ▶ Analyze comments on first document
- ▶ Compare Canada and U.S. food and pesticide uses:
  - ◆ Determine the pesticide-crop combinations covered under GMRL in Canada.
  - ◆ Compare these to U.S. Tolerances based on EPA information.
  - ◆ Information gathered from (~3000) labels of registered pesticide end-use products and entries from Table II, Food and Drug Regulations.
  - ◆ *Some 4500 food commodity-active ingredient combinations fall under GMRL.*

# Proposal limitations

- ▶ Proposal will not automatically:
  - ◆ Resolve differences when U.S. tolerances are greater than 0.1 ppm.
  - ◆ Fix the technology gap, including for minor uses
  - ◆ Lead to Canadian registrations for uses or pesticides
- ▶ These remain issues for further consideration

# Related Issues

- ▶ Transition period: one time period for all transitional MRLs
- ▶ Research permits: sponsor proposes MRL for period of study
- ▶ Emergency use: maintain GMRL for this purpose only
- ▶ Level of quantification: based on level of quantification of field trial method

# Next steps

- ▶ Release consultation document
- ▶ Detailed comparison available on website
- ▶ 90 days for comments