

Codex Maximum Residue Limits (MRLs): The Need and Increasing Capacity

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April 24, 2017

Beijing, China

Outline of Presentation

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Background: International Year of Pulse (IYP) Initiative

- 2016 was the International Year of Pulse (IYP) and the Global Pulse Confederation dedicated resources to advocacy efforts concerning the extent of the lack of or misalignment of maximum residue limits (MRLs).
- MRLs that have been established in other jurisdictions but not (yet) at Codex may disrupt trade and constrain growers' productive use of pesticides, including newer, safer products, in pulse growing regions of the world, including farmers in developed and developing countries alike.
- Ongoing MRL challenges as:
 - more countries develop national MRL lists without continuing to reference Codex; applying zero or near-zero default MRLs in absence of established MRLs.
- Never a greater need for a single, global MRL reference.

Importance of Codex MRLs

- The results of the work of Joint Meeting on Pesticide Residues (JMPR) and Codex Committee on Pesticide Residues (CCPR) play an important role for the safety of the consumer but also for the facilitation of world trade of food commodities.
- Codex MRLs are referenced by WTO under the SPS agreement as international standards for food and feed moving in international trade and are legal limits with consequence for non-compliance.
- The procedures/methodologies and outcomes of the JMPR/CCPR are valuable to many regulatory authorities and others involved in agriculture.
- Lack of or misaligned MRLs may disrupt trade, constrain the use of pesticides including non-use of newer, safer compounds for farmers in developed and developing countries alike.

Goal of the IYP MRL Strategy

Goal of the IYP MRL strategy is:

- to increase the capacity of the Joint Meeting on Pesticide Residues (JMPR) resulting in an increase number of Codex MRLs established each year.

Specifics Initiatives of Strategy

The Global Pulse Confederation (GPC) has developed a strategy to support the JMPR/CCPR and Codex MRL establishment initially in the context of the 2016 International Year of Pulses (IYP). Specifics include:

- The framing of the universe of Codex MRLs needed to minimally match those established in other countries and to address specific specialty crops in countries now globally traded with few Codex MRLs;
 - Would be achieved through the development of a “catch-up” plan.
- Involve developing countries where the MRLs issues are creating obstacles for farmers.
- Increase the number of experts on JMPR, with the support of member countries.
- Ensure budget is available to JMPR /CCPR.

Specifics Initiatives of Strategy (Cont'd)

- Leverage the availability of electronic tools.
- Utilize to extent possible national reviews and MRLs already established by national authorities and avoid duplicative work.
- Maximize the use of crop groupings and representative commodities.
- Avoid re-work and delay through clear guidance on residue trial requirements.
- Ensure the consistency of application and adherence to the policies adopted by JMPR and CCPR.

Specifics of “Catch-Up” Plan: Closing the Gap

- The United States is often the first country industry seeks registration for new pesticide active ingredients and uses in and, therefore, is often where MRLs are first established.
- The “catch-up” plan will identify gaps in Codex MRLs as compared to the MRLs established in the US as well as in other countries to the extent information is available. The “catch-up” plan will be developed in an Excel spreadsheet and along with a narrative through the following steps:
 - Compare list of registered active ingredients in the US to those reviewed by JMPR/WHO. Produce list of active ingredients with residues greater than the LOQ needing JMPR/WHO review for ADI (acute/chronic) setting. This will estimate workload of WHO.
 - Priority schedule for JMPR review will be reviewed and scheduled review times will be noted.
 - Estimate numbers of Codex MRLs needed to close the gap between the number of established US MRLs and established Codex MRLs.
 - Determine an new active ingredients pending in regulatory authorities to consider future JMPR workload.
 - Consult with companies to determine support for obtaining Codex MRLs for the chemical/crop combinations.

Specifics of “Catch-Up” Plan

- Commodity groups and country contacts will be contacted to solicit input on the need for a Codex MRL for a specific commodity.
- MRLs established in other countries, to the extent data are available, will be reviewed to identify additional needed Codex MRLs particularly for specialty crops specific to certain geographic locations. Also, input could be solicited from other countries (national authorities, commodity groups) on needed Codex MRLs.
- Prepare a preliminary report on the chemical/commodity combinations gaps where Codex MRLs are needed.

Specifics of “Catch-Up” Plan


- The “catch-up” plan will be discussed with the FAO and WHO JMPR Secretariats and possible options on how to accomplish the work will be identified; concept already has been discussed.
- Process improvements to efficiently complete the “catch-up” plan and sustain the required pace of establishing Codex MRLs going forward will be critical to the implementation of the plan.
- Additionally, funding options to complete the work in the “catch-up” will be developed in consultation with FAO and WHO.
- Coalitions to advocate to the WHO/FAO leadership and member states the need to establish the MRLs identified in the “catch-up” will be critical to advance the initiative.

Key Messages

- Trade is critical to food security and the ability to trade in food is central to the livelihoods of many of the world's rural poor.
- Delays in the establishment of MRLs and the resulting lack of harmonization have important consequences for market access, productivity and farmer livelihoods
- Enabling Codex to perform its role effectively by addressing current capacity challenges and ensuring adequate resources are available is essential to supporting global food security.

Next Steps for Country Delegations

- Feedback on the strategy from national regulatory authorities would be appreciated.
- Country specific MRL needs to support the country specific agriculture is needed to be sure “catch-up” plan is inclusive.
- Country interest in the effort critical to its success.



Thank you!
Your Thoughts and Input Are Needed and
Welcomed!

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