

Agchem Industry Perspective on the APEC Guideline & Import Tolerances

CCPR51- Macau

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Presentation flow

- CropLife and some insights into our world
- One MRL
- The APEC Guideline
- Best practice in import tolerances

Who is CropLife International?

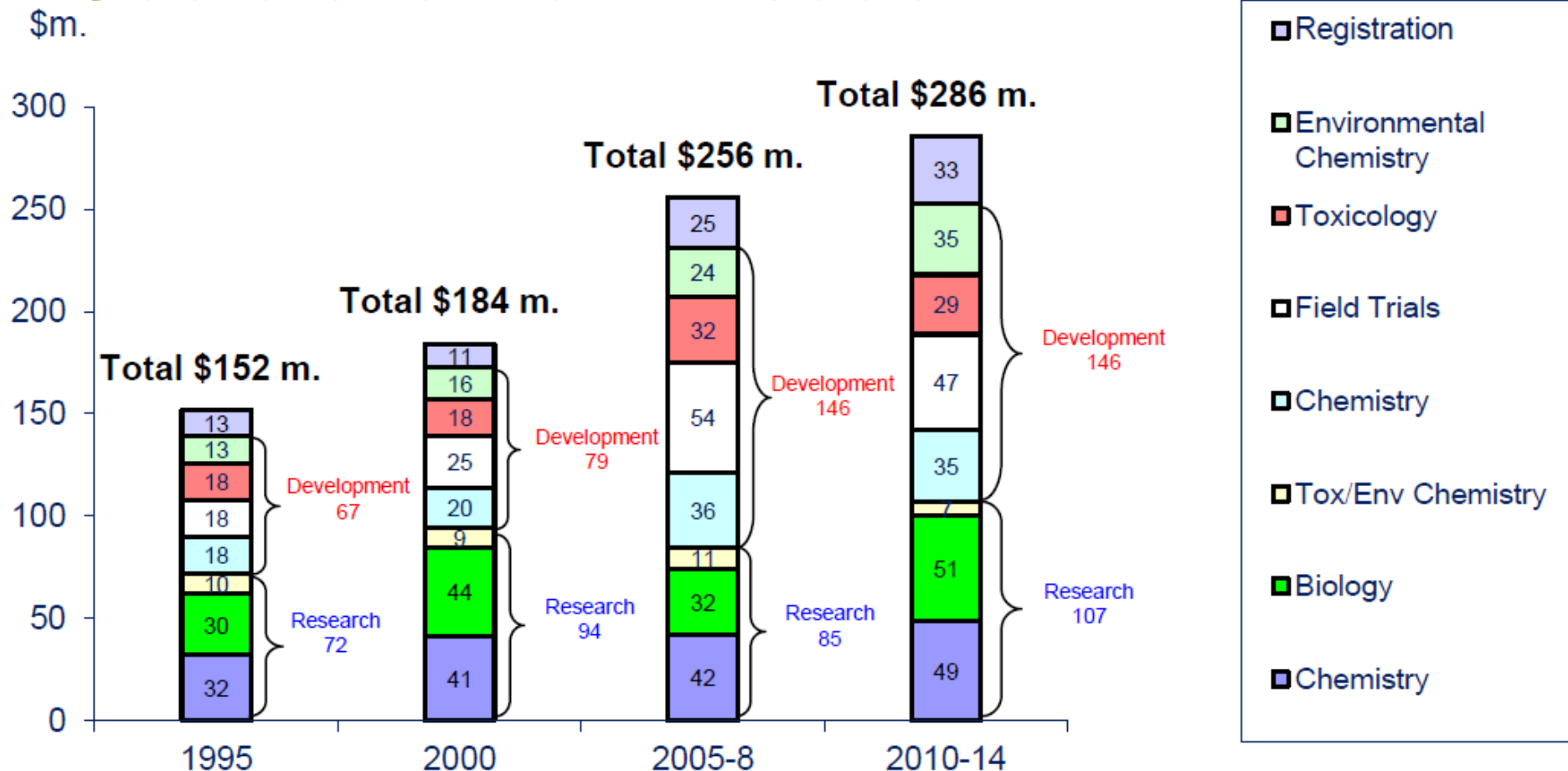


CropLife International and its Global Network are:

- **The voice and leading advocates for the plant science industry.**
- We champion the role of agricultural innovations in crop protection and plant biotechnology to support and advance sustainable agriculture.



Discovery & Development Costs of a New Product



Source: <https://croplife.org/wp-content/uploads/2016/04/Cost-of-CP-report-FINAL.pdf>

Typical company spend on MRLs & ITs



Our annual spend in residue trials is about \$25 million & 



Typical cost per residue trial is around \$12,500



Conduct between 2000 – 2500 residue trials per year



Spend over \$1.0m on IT costs each year (3 year average)

The situation today: MRLs are not harmonized



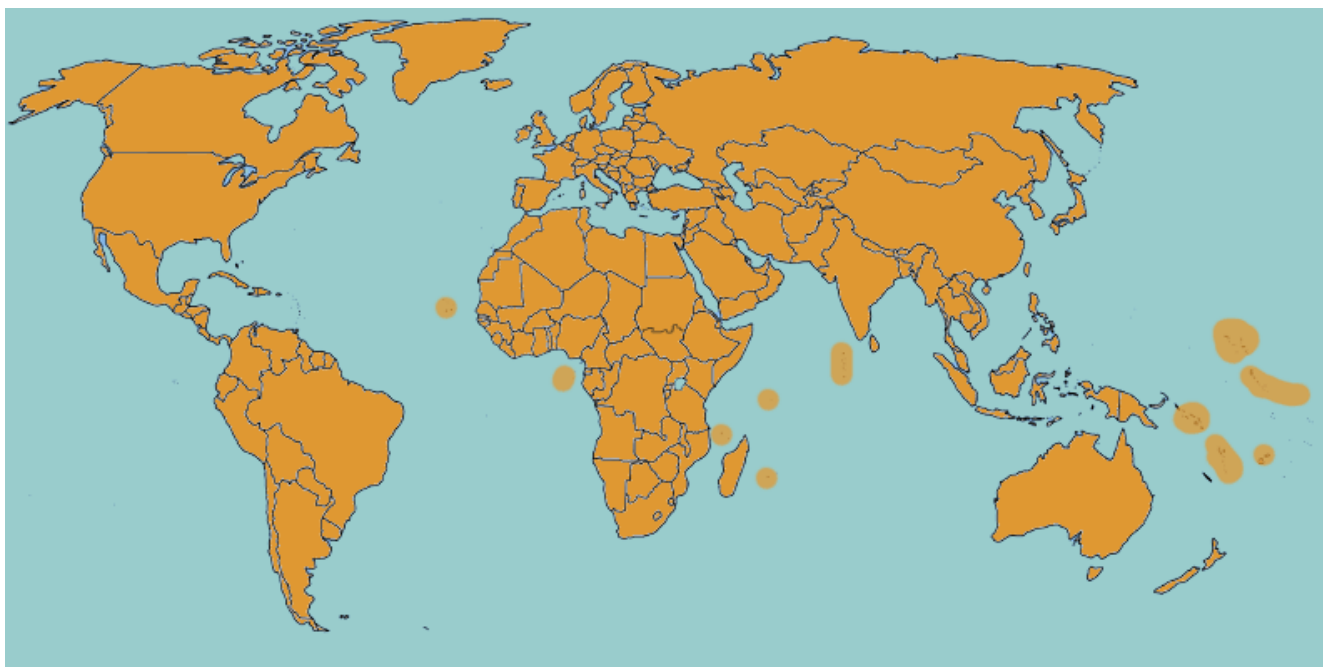
Active / Commodity	No. of different MRLs	Range of MRLs (mg/kg)
Chlorothalonil / grapes	10	0 - 10
Cyhalothrin / tomatoes	9	0 - 0.7
Fludioxonil / strawberries	8	0 - 5
Thiamethoxam / oranges	9	0 - 1
Diquat / canola	7	0 - 5

Source: Bryant Christie MRL database 1 Apr 2019

Our industry aspiration

- The aspiration of the agchem industry is to have:

One MRL

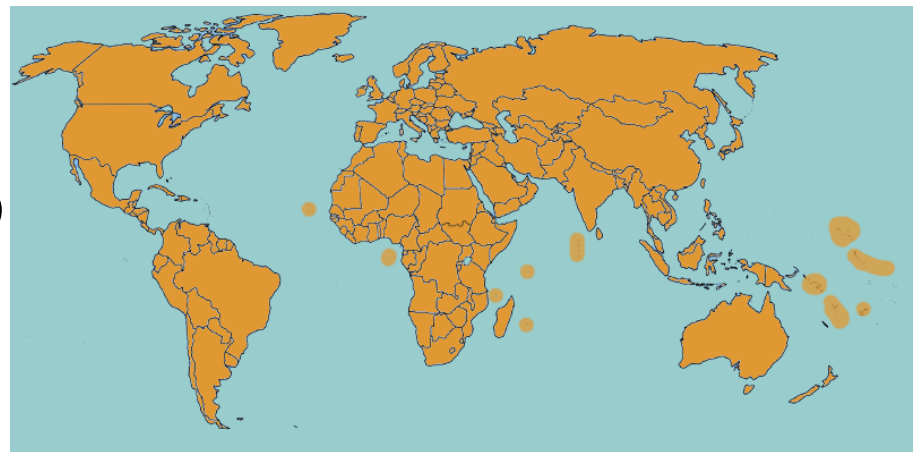


- Ultimately everyone defers to CODEX

Realistic dream (APEC)

CODEX MRLs are established first!

- Is it possible for JMPR to participate in international reviews of new ais?
- Countries then use the APEC Guideline principles to adopt CXLs into their national standard
- Not everyone deferring to CODEX but still achieves harmonized MRLs

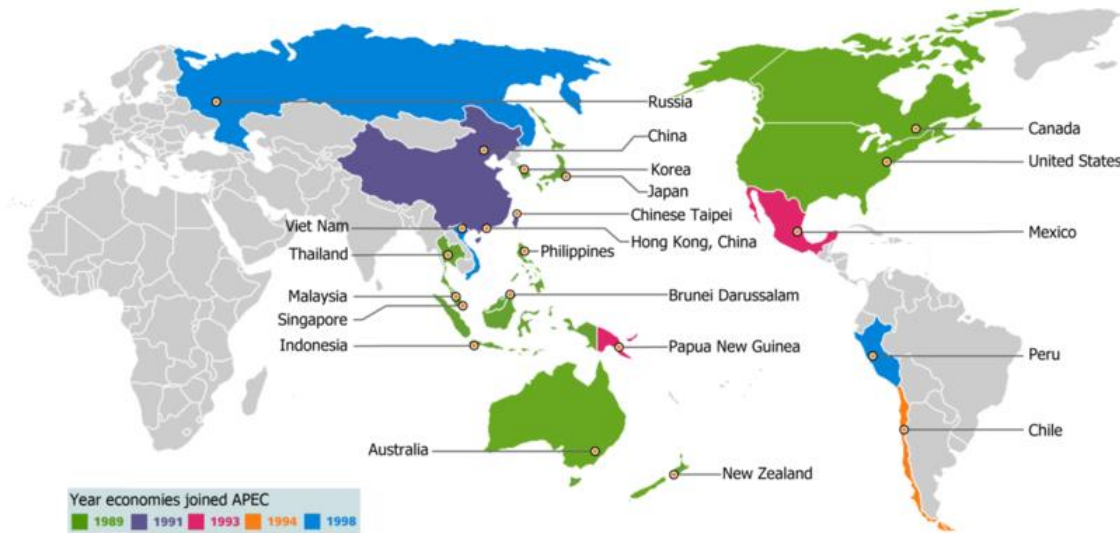


The APEC Guideline

- Is simple
- Is resource light
- Is science and risk based
- Is transparent
- Is protective
- Is predictable

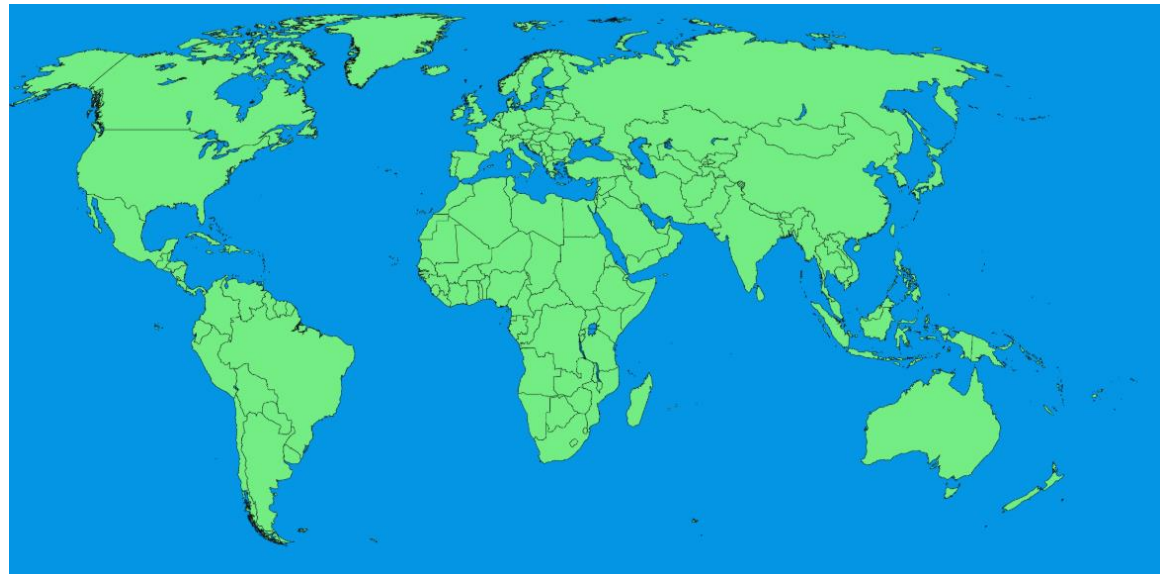


The APEC Guideline



< Applicable now

Applicable future? >



Import tolerance system as a last resort

- For political and other reasons it is not always possible to defer to CODEX (aspiration) or harmonize to CODEX (realistic dream)
- If this is the case then to facilitate trade implement a transparent and science based import tolerance system



The components of a good IT system

- Transparent
- Predictable
- Timely
- Protective
- Science and risk based
- Follows international best practices as JMPR does
- Leads to the standard being updated and published regularly
- Uses existing international data
- Compliments domestic MRLs but is not restricted by them

Conclusion

- Our aspiration:

One MRL

- Ideally everyone defers to CODEX
- In the interim everyone uses the APEC Guideline principles to adopt CXLs into their national standard
- If this is not possible then implement an import tolerance process that follows international best practice