

## The Role of National Commodity Associations' MRL Assessment Committees

By: Victoria Linden, Director of Research at Cereals Canada

September 2020

The Pest Management Agency of Health Canada (PMRA) is responsible for ensuring that crop input products registered in Canada are safe to use for applicators and pose negligible risk (zero risk is impossible) to consumers. Health Canada sets Maximum Residue Limits or MRLs (the maximum amount of residues that are expected to remain on food products when a pesticide is used according to label directions) well below the amount that could pose a health concern.

However, the government is not responsible for ensuring that the use of new products do not pose a trade risk. Why might a new product be judged safe to use in Canada but still pose a risk for exports? There are two key reasons. First, a major market may not have gone through their own regulatory process and have a MRL near zero. Second, an importing country may have veered from a science-based assessment and set their national MRL far below internationally accepted levels.

It is up to the national commodity associations to bring together the value chain to evaluate these market access risks. Each year, MRL Assessment Committees (MAC) meet through the facilitation of the national commodity associations (Canola Council of Canada, Cereals Canada and Pulse Canada) to review any newly registered or label expansions of crop protection products. Each commodity's MAC uses the Canada Grains Council's [Market Acceptance of Pesticide Use Policy](#) and has representation from across the value chain including developers, farmers, grain handlers and exporters, processors and end use companies.

The purpose of the MAC is to provide a venue to assess risk associated with residue levels on commodities and the potential impact on market access. The goal is to gain consensus and meet in the middle of minimizing trade risks and enabling access of growers to new crop protection products.

The first step in the process that the MAC follows is to identify markets of interest of the commodity in question to consider markets that are:

- standard setters (i.e. Codex, USA, EU, Japan)
- undergoing policy change (i.e. China, South Korea)
- major export markets (i.e. >5% of total exports over the previous 3 year period)
- significance to the value chain (i.e. >\$50M/year)

The second step in the process is to identify the crop input products of interest, such as products recently registered in Canada.

The third step in the process is the risk assessment where the MAC considers many parameters such as the proposed use pattern, regional distribution of intended product use, field trial residue data summaries and compares this information against available MRLs in markets of interest. Throughout this risk assessment process the MAC works closely with the product registrants.

As a result of this risk assessment the commodity's product use is categorized as either:

- Green/No Recommendation
  - Import MRLs are in place

- Low likelihood of residue exceedances upon import
  - Chemistry/use pattern to be accepted by all grain exporters
- Amber/Be Informed
  - Possibility of residue exceedances upon import, especially when shipped by container
  - Treated grain may not be accepted by some exporters
- Red/Do Not Use
  - High risk of MRL related trade disruption
  - Chemistry/use pattern not accepted by all grain exporters
  - Chemistry/use pattern not to be commercialized and sold

This process is an example of the value chain working together to minimize trade risks while maximizing the ability to deliver new crop input products to farmers. The process is voluntary. It would not work if exporters did not accept the results and refused to accept delivery of grain that has been treated with products that pose minimal trade risk. Similarly, the process would break down if developers did not acknowledge that products deemed to be high risk (“red”) might need to be held back from the market until export concerns are resolved.

Each commodity’s MAC will meet between November and January to conduct these reviews to inform initiatives such as the [Keep it Clean](#) Products of Concern and the [Western Grain Elevator Association](#) Producer Declaration forms for Western Canada grain deliveries to name a few.