



NAFTA Technical Working Group on Pesticides
Grupo de Trabajo Técnico del TLCAN sobre Plaguicidas
Groupe de travail technique de l'ALENA sur les pesticides

Food Residues - Trade Irritant Resolution:

Chemical/commodity combinations where MRLs are numerically different, but in reality, residues are in compliance with the MRLs of both the producing and importing countries.

The United States, Canada, and Mexico are all major agricultural producers and exporters to each other. Through the NAFTA Technical Working Group (TWG), all three countries work with stakeholders to ensure national pesticide standards are met. One of the goals of the NAFTA TWG is developing a coordinated pesticide regulatory framework among NAFTA partners. The U.S., Canada and Mexico and many other countries set regulatory enforcement levels for pesticide residues on food commodities. These limits help ensure that pesticides are used in accordance with the registered label. These levels are called Maximum Residue Limits (MRLs or LMRs) or tolerances, which are essentially synonymous terms. For ease of discussion on this topic, only the term MRL will be used.

For a variety of reasons, MRLs can differ for the same chemical/commodity combinations between NAFTA countries. These include:

- MRLs established independently in each country as pesticide registrations were sought by pesticide manufacturers
- differing pest pressures / differing pesticide use patterns / good agricultural practices
- different approaches to what residues (e.g. parent, metabolites) should be included in the MRL
- a crop group MRL is established in one country and an MRL on a single commodity in that crop group exists in the other country.

The NAFTA TWG has been piloting commodity projects on potatoes, tomatoes, [avocados](#) and pulse crops to eliminate trade barriers for growers by resolving differences in MRLs. Many of the commodity/chemical combinations in these projects have been resolved; [potatoes](#), [pulse crops](#), and [tomatoes](#).

Also, the TWG found a number of cases where the Canadian and U.S. MRLs differed numerically, but in reality the actual residues levels are in compliance with the MRLs of both the producing country and importing country when the pesticides are used in accordance with the registered use (i.e., when the label is followed and when good agricultural practices are employed.) Overtime, these cases will be addressed within the regulatory framework respecting the modern-day scientific health and environmental protection standards. At this time, the TWG priority will be focused on those cases where actual trade barriers exist, as identified during this exercise. These “cases” presented in Table 1 should pose no compliance problems, so long as the pesticides are applied strictly in accordance with the approved labels.

Table 1: Pesticide Chemicals and Commodity Combinations for which residues are in compliance even though the MRLs differ numerically. (as of September 2007).

Pesticide Chemical	Commodity	U.S. MRL (ppm)	Canadian MRL (ppm)	Explanation as to why the pesticide residues on the commodities are in compliance even though the MRLs differ...
Bentazon	Beans, dried	0.05	0.5	The Canadian MRL is greater than the U.S. MRL. However, the Canadian residue field trial data on peas and beans conducted in accordance with good agricultural practices and using Canadian use patterns indicate residues are not expected to exceed 0.05 ppm, the U.S. MRL.
	Peas, dried	0.05	3.0	
Cyhalothrin-lambda	Potatoes	0.02 (pending)	0.01	The U.S. MRL is higher than the Canadian MRL. The U.S. chose to set the MRL at 0.02 ppm to harmonize with Codex as encouraged by FQPA, and we made a safety finding at that level. However, U.S. field trial residue data on potatoes, reflecting U.S. use patterns, are not expected to exceed 0.01 ppm, the Canadian MRL.
Glyphosate	Vegetable, legume , group 6 exc. Soybean and dry, pea	5.0	Bean 4.0 Lentil 4.0	The U.S. MRL is higher than the Canadian MRL. The U.S. field trial residue data on beans and lentils, reflecting U.S. use patterns, are not expected to exceed 4 ppm, the Canadian MRL.
Quizalifop	Peas	--	0.05	U.S. legume vegetable crop group #6 MRL is higher than the Canadian MRL on peas. Crop group MRLs tend to be established at higher levels than on the individual commodities in the group to accommodate the residue variation (e.g., size) that occurs between the commodities in the group, assuming we can make the safety finding. The residue field trial data on dried peas specifically, reflecting U.S. use patterns, are not expected to exceed the Canadian MRL of 0.05 ppm.
	Legume vegetable crop group #6	0.25	--	
Flutolanil	Potato	0.2	0.1 (default)	U.S. residue field trial data, reflecting U.S. use patterns, indicate residues are not likely to exceed 0.1 ppm. The use of flutolanil on potatoes is not currently a registered use in Canada.