

# Canadian MRL update

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[www.croplife.ca](http://www.croplife.ca)



- Historically MRLs were less problematic for Canada
- Now one of our industry's top priorities – as well as for our grower groups
- New multi-stakeholder approach underway...
- PMRA
  - Strong commitment to GJR
  - Resources committed for JMPR
  - Shortening time between pMRL and final MRL (CFIA cooperation)
  - Process established for developing Codex MRL priorities
  - Default MRL ??



## NAFTA Industry Working Group on Pesticides

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### **Moving Forward 2014-2019**

- 1. Synchronous introduction of new tools for crop solutions to eliminate any trade barriers**
  - Consider regulatory cooperation moving beyond NAFTA
  - Global GAP approach used whenever feasible to further utilize joint efforts and MRL harmonization
  - Full harmonization of crop grouping within NAFTA and CODEX
  - Implement learnings from the pilot project conducted with JMPR to allow MRL recommendations in parallel with a global joint review group (as recommendation from Global Minor Use Summit, 2007) and conduct another project to resolve the outstanding concerns within CODEX
  - Explore ways to further harmonize MRLs and/or accept Codex MRLs





# Moving Forward 2014-2019

- Agriculture is global so synchronicity/harmonization within NAFTA must now extend to the rest of the world to influence our external trade environment.
- Predictable Global trade environment that contributes to global food security, and achieves harmonization of the ability to use a product (same crops, same uses, same conditions for use, same MRLs)
- NAFTA can play a key role in ensuring continuation of GJRs and minimizing duplication of review (e.g. peer review)

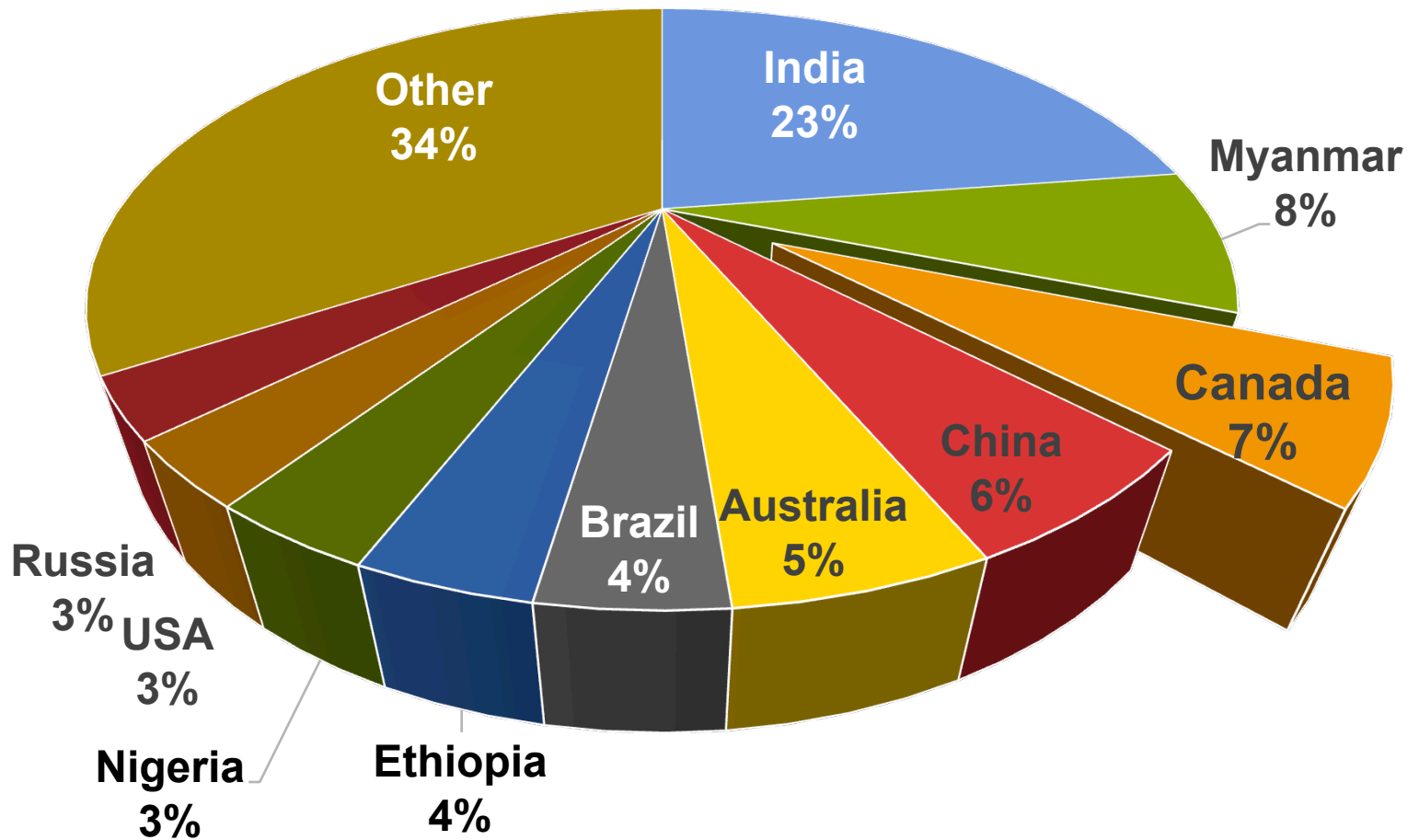


# ***Canadian Industry/ Government MRL Task Force***

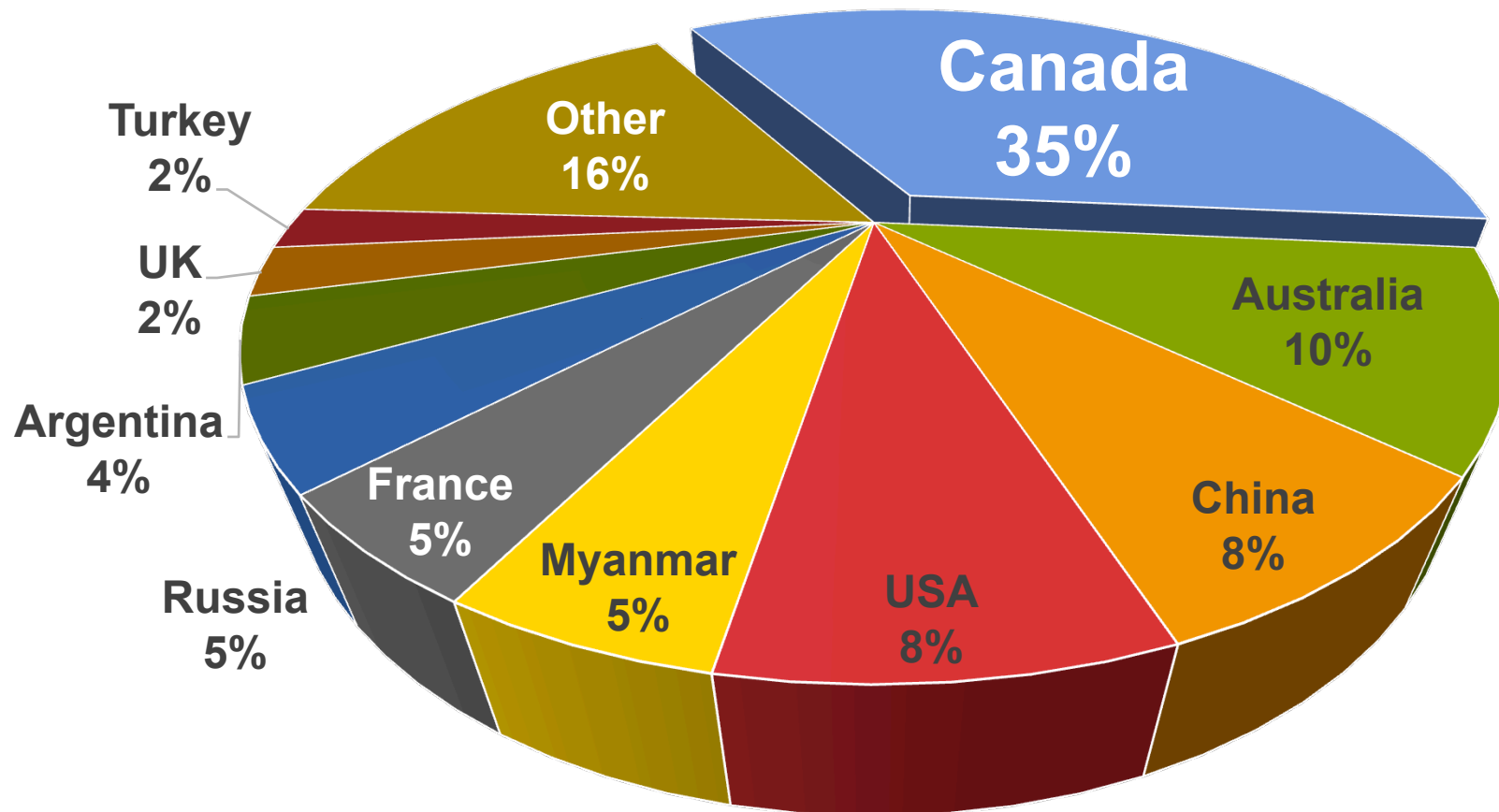
**Gord Kurbis  
Director, Market Access and Trade Policy  
Pulse Canada / Canadian Special Crops  
Association**



# Top Pulse Producers



# World Trade in Pulses



# Composition of Task Force

## Funding Grower Groups

- Pulse Canada / Canadian Special Crops Association
- Grain Growers of Canada
- Canadian Horticulture Council
- Canadian Federation of Agriculture
- Ontario Fruit and Vegetable Growers
- Alberta Wheat Council

## Government

- PMRA
- Agriculture Canada Technical Trade Barriers
- Agriculture Canada Market Access Secretariat
- Canadian Food Inspection Agency
- Department of Foreign Affairs, Trade and Development

## Registrants

- CropLife Canada
- Syngenta
- Monsanto
- Bayer
- BASF
- Dow

## Other Grower Groups

Canola Council, GFO, Malting Barley, Grains Council



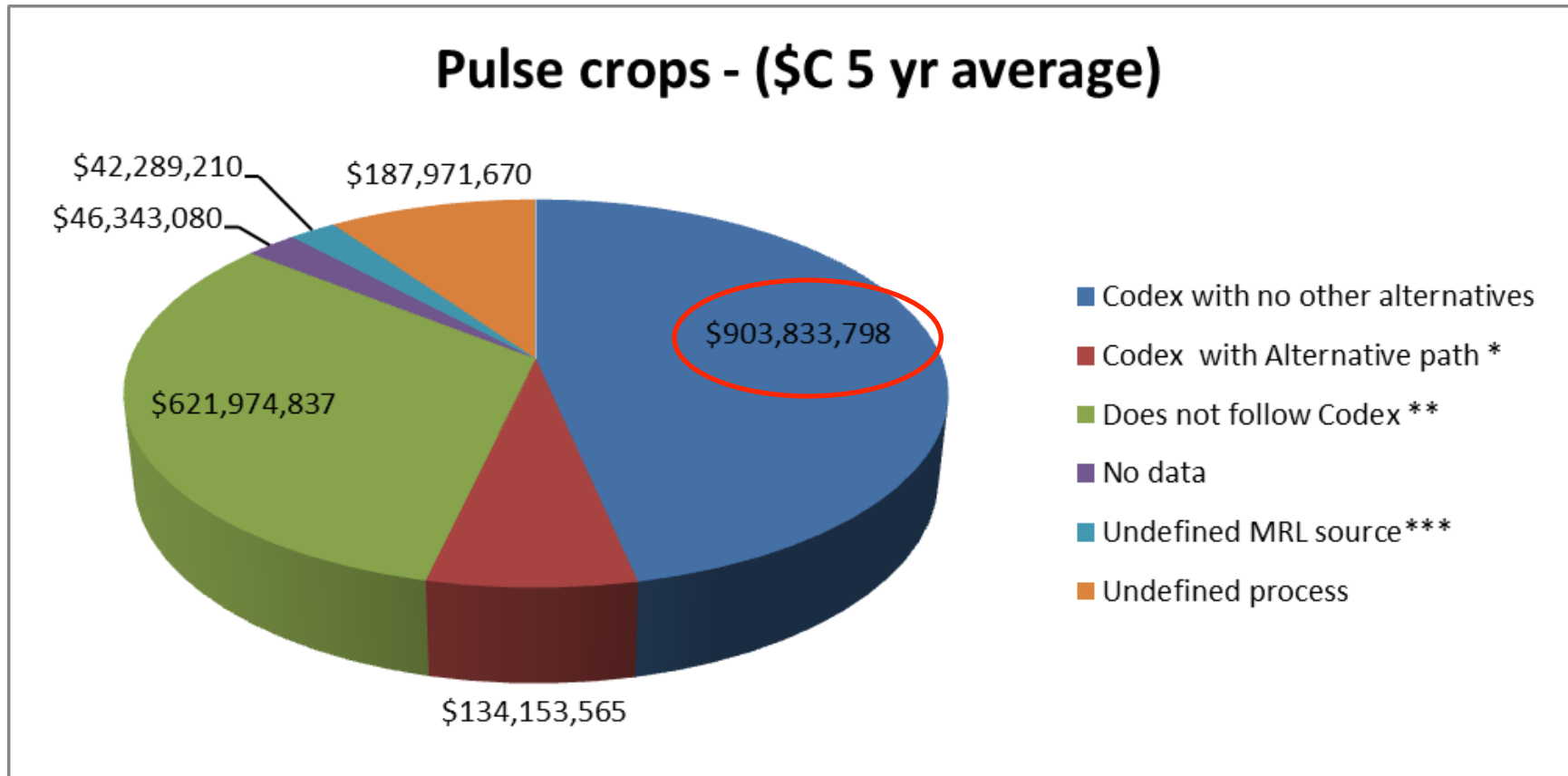
## Governance and Funding Model

- Grower/Government funded MRL project created as part of Task Force (2013-14 to 2017-18) (50% AAFC funding, 50% industry).
- Industry steering committee consisting of funding grower groups has oversight of MRL project; project administration by Pulse Canada.
- Task Force also serves as information-sharing forum and helps inform development of Canadian position on MRL issues.
- Key activities and approaches to MRL issues informed by 'trade at risk' calculations.

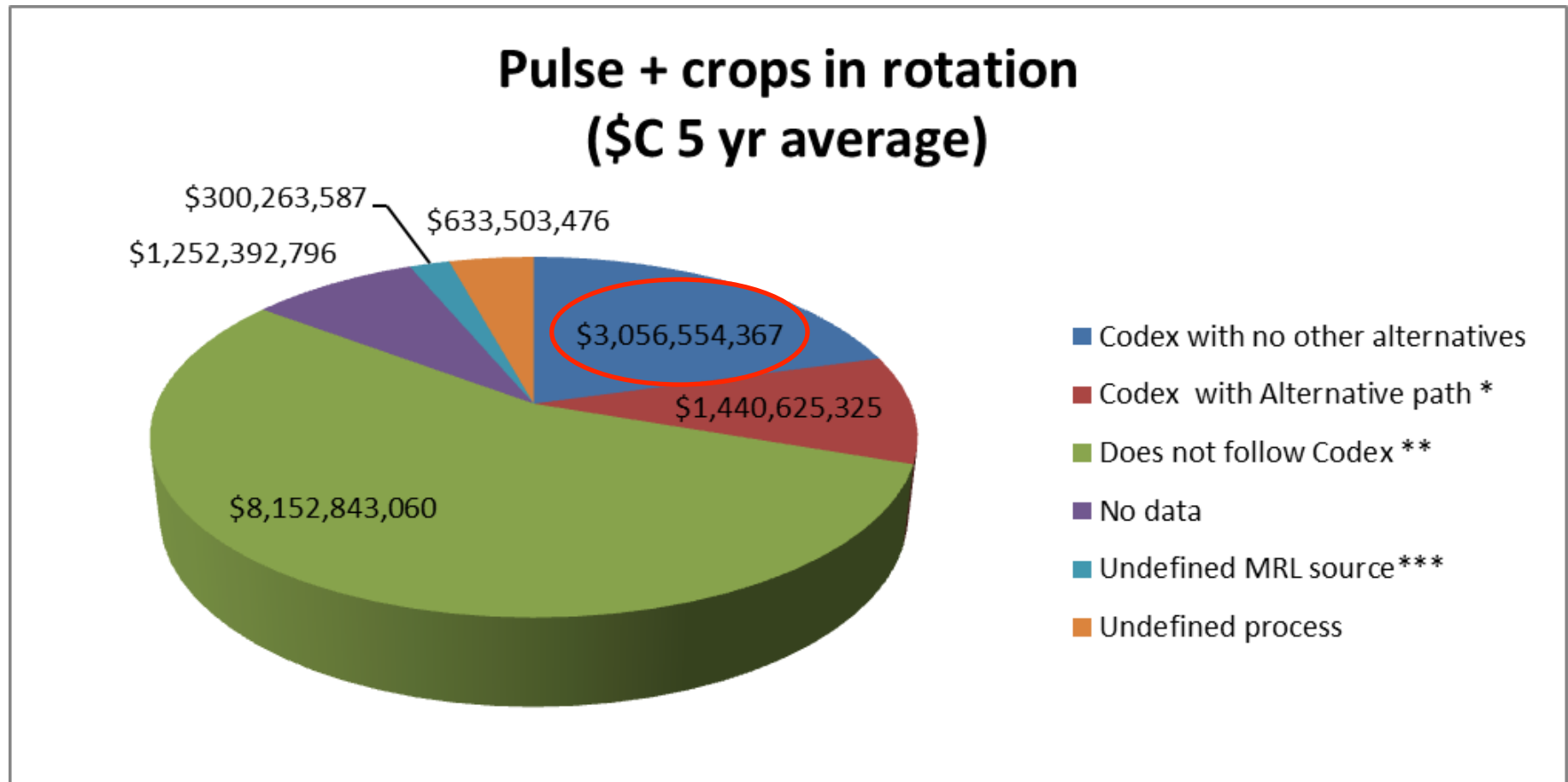
# Country by Country Analysis

Country	MRL PolicyDescriptor - Work to date	MRL Classification	Peas	Chickpeas	Dry Beans	Lentils	Wheat	E
Afghanistan	No Data	Undefined process	\$ 649,419		\$ 6,665	\$ 18,311		
Albania	Partially Follows Codex	Does not follow CXLs			\$ 31,600	\$ 36,337		
Algeria	Follows Codex	Codex with no other alternatives for sig actives	\$ 3,038,929	\$ 1,807,613	\$ 173,457	\$ 57,722,520	\$ 217,281,238	\$
American Samoa	Does not follow codex	Does not follow CXLs				\$ 267,622		
Angola	Follows Codex	Codex with no other alternatives for sig actives	\$ 15,625	\$ 107,481	\$ 20,271	\$ 171,236		
Anguilla	No Data	Undefined process				\$ 50,870		
Antigua and Barbuda	Follows Codex	Codex with no other alternatives for sig actives	18,750	\$ 1,784	\$ 19,789	\$ 10,701		
Argentina	Partially Follows Codex	CXL with Alternative path	\$ 80,238	\$ 4,485		\$ 1,018,247	\$ 4,999,830	
Armenia	No Data	Undefined process	\$ 30,068	\$ 49,436		\$ 373,337		
Aruba Island	No Data	Undefined process	\$ 2,665		\$ 1,876	\$ 770		
Australia	Does not follow codex	Does not follow CXLs	\$ 695,695		\$ 3,570,888	\$ 1,208,669	\$ 124,534	
Austria	Does not follow codex	Does not follow CXLs	\$ 5,018	\$ 3,603	\$ 15,305	\$ 99,993	\$ 136,646	
Azerbaijan	No Data	Undefined process	\$ 34,133			\$ 65,710		
Bahamas	Partially Follows Codex	CXL with Alternative path	\$ 12,256			\$ 417,409		
Bahrain	Partially Follows Codex	Does not follow CXLs	\$ 273,638			\$ 355,835	\$ 6,417,500	
Bangladesh	Follows Codex	Codex with no other alternatives for sig actives	\$ 74,180,269	\$ 382,107		\$ 48,282,586	\$ 221,123,198	
Barbados	Partially Follows Codex	CXL with Alternative path	\$ 776,976	\$ 13,286	\$ 1,211	\$ 45,778		
Belarus	No Data	Undefined process			\$ 21,422			
Belgium	Does not follow codex	Does not follow CXLs	\$ 3,403,055	\$ 498,595	\$ 273,833	\$ 5,424,150	\$ 87,017,583	\$
Belize	No Data	Undefined process	\$ 78,244					
Benin	No Data	Undefined process	\$ 903,125					
Bermuda	Partially Follows Codex	CXL with Alternative path	\$ 320		\$ 315	\$ 798		
Bhutan	No Data	Does not follow CXLs	\$ 31,750					
Bolivia	No Data	Undefined process				\$ 139,381		
Bosnia-Herzegovina	No Data	Undefined process		\$ 20,627	\$ 379,712	\$ 13,736		
Brazil	Partially Follows Codex	Does not follow CXLs	\$ 5,009,416	\$ 159,989		\$ 11,199,965	\$ 84,527,922	\$
British Indian Ocean Territories	No Data	Does not follow CXLs	\$ 9,007		\$ 9,530	\$ 49,770		

# Pulse & Special Crops Exposure



# Canadian Grain Industry Exposure



# Key Task Force Activities and Approaches

- Building knowledge of tolerances, gaps and vulnerabilities
  - Query tool
  - Risk Scans
  - Grower outreach, advisories
- Addressing MRL gaps
  - Codex advocacy and reforms
  - Integration of minor use registrations with MRLs
  - MRLs for actives that are now generic
  - Bilateral agreements:
    - principle of mutual recognition
    - Global Joint Reviews



## Pulse Industry

Search Site 

### Market Access

COMMODITIES

MARKETS

PESTICIDES

MYCOTOXINS

HEAVY METALS

RESULTS

SUBMIT

Video Tutorial

#### RESULTS

Your results are listed on the right.  
Use the tabs on the left to adjust your query.

NMS = No Maximum Set  
All MRLs are measured in PPM.

*\*Every effort is made to ensure the accuracy of the information contained in this database. However, Pulse Canada should not be held responsible for any errors in the information contained in the database. Please report to us any erroneous information you may encounter.*

Last Updated: December 31, 2013

#### SELECTED COMMODITIES

Beans, Dry  
Chickpea  
Lentil  
Peas, Field or Dry

#### SELECTED MARKETS

Canada  
CODEX  
EU  
US

#### SELECTED PESTICIDES

Carfentrazone-Ethyl  
Diquat  
Flumioxazin  
Glufosinate-Ammonium  
Glyphosate  
Saflufenacil

#### RESULTS

##### Chickpea : Saflufenacil

NMS = No Maximum Set

CANA	CODX	EU	USA
0.3	NMS	NMS	0.3

##### Lentil : Carfentrazone-Ethyl

NMS = No Maximum Set

CANA	CODX	EU	USA
0.1	NMS	0.01	0.1

##### Lentil : Diquat

NMS = No Maximum Set

CANA	CODX	EU	USA
0.2	0.2	0.2	NMS

##### Lentil : Flumioxazin

NMS = No Maximum Set

CANA	CODX	EU	USA
0.05	NMS	0.05	0.07

##### Lentil : Glufosinate-Ammonium

NMS = No Maximum Set

CANA	CODX	EU	USA
6	NMS	3	NMS

##### Lentil : Glyphosate

NMS = No Maximum Set

CANA	CODX	EU	USA
4	5	10	5

##### Lentil : Saflufenacil

NMS = No Maximum Set

CANA	CODX	EU	USA
0.3	NMS	NMS	0.3



Y1

X ✓ f\_x

No LOQ

	A	B	C	D	E	F	G	O	P	Q	R	S	T	U	V	X	Z	AA	AB
	Status	Bean	Chic kpea	Lenti l	Pea	Product	Active ingredient	Company	MRL Canada (ppm)	MRL Codex (ppm)	MRL EU (ppm)	MRL US (ppm)	Cargo mean in Canada	Cargo max in Canada	Samples (2009- 2012)	LOQ	No samples tested	Mean > MRL	Max MRL
1																			
17	S			x		Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
29	G		x			Apron Maxx	fludioxonil	Syngenta Canada	0.40	!	0.05	0.01				0.02	X		
32	G	x				Apron Maxx	fludioxonil	Syngenta Canada	0.40	0.07	0.05	0.40				0.02	X		
34	G			x		Apron Maxx	fludioxonil	Syngenta Canada	0.40	!	0.05	0.01	0.02	0.02	3	0.02		X	X
35	G				x	Apron Maxx	fludioxonil	Syngenta Canada	0.40	0.07	0.05	0.01	0.02	0.02	28	0.02		X	X
38	E		x			Roundup	glyphosate	Monsanto Canada	4.00	!	10.00	5.00	0.05	0.27		0.05			
43	E			x		Roundup	glyphosate	Monsanto Canada Inc.	4.00	5.00	10.00	5.00	2.63	7.41	9	0.05			X
44	E				x	Roundup	glyphosate	Monsanto Canada	!	5.00	10.00	8.00	2.22	2.92	8	0.05			
65	S		x			Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
72	S			x		Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
86	S				x	Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
98	S		x			Roundup	glyphosate	Monsanto Canada	5.00	!	10.00	5.00					X		
99	G		x			Aim	carfentrazone	NuFarm	!	!	!	!					X		
111	E	x				Reglone	diquat	Syngenta Canada	0.20	0.20	!	0.05	0.02	0.02	2	0.02			
117	G	x				Aim	carfentrazone	NuFarm	!	!	!	!					X		
119	S				x	Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
120	S			x		Aim	carfentrazone	NuFarm	!	!	!	!					X		
127	S			x		Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
130	S				x	Aim	carfentrazone	NuFarm	!	!	!	!					X		
139	G	x				Heat	salflufenacil	BASF Canada Inc.	!	!	!	!					X		
153	S			x		Liberty	glufosinate	Bayer	!	!	!	!					X		
154	S				x	Liberty	glufosinate	Bayer	!	!	!	!					X		
225	G	x				Switch	fludioxonil	Syngenta Canada	!	!	!	!					X		
262	E				x	Reglone	diquat	Syngenta Canada	0.20	0.20	!	0.05	0.02	0.02	8	0.02			
271	E	x				Roundup	glyphosate	Monsanto Canada Inc.	4.00	2.00	2.00	5.00	2.74	4.19	4	0.05		X	X
274	S				x	Roundup	glyphosate	Monsanto Canada									X		
275	E			x		Reglone	diquat	Syngenta Canada	0.20	0.20	0.20	0.05	0.02	0.02	6	0.02			
278	S	x				Roundup	glyphosate	Monsanto Canada	4.00	2.00	2.00	5.00	2.74	4.19	4	0.05		X	X
281	S		x			Roundup	glyphosate	Monsanto Canada	6.00	!	10.00	5.00					X		
282	E	x				Roundup	glyphosate	Monsanto Canada	4.00	2.00	2.00	5.00	2.74	4.19	4	0.05		X	X

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## IMPORTANT INFORMATION FOR PULSE GROWERS



### *Grower Advisory:*

# **Be Aware of Market Risks Involved with Desiccant Use This Season**




Although the pulse industry in Canada has made significant progress in developing acceptable maximum residue levels (MRLs) globally for pulse crop products used in Canada, growers are still advised to be aware of possible marketing restrictions that may arise from using certain desiccants/harvest management tools this season.

Specific guidelines for products are available on the next page of this document, but growers are also urged to review all the information in this document before proceeding with plans for their pulse crop products this season.

### **What are dessicants/harvest management tools?**

Desiccants/harvest management tools are used worldwide by growers who produce crops that require "drying down" to create uniformity of plant material at harvest. These products may also assist in preharvest weed control. In Canada, these products include diquat (Beclone), glyphosate (Roundup), saflufenacil (HEAT), and glufosinate.

# 2014 grower desiccant advisory table

Market	Glyphosate as a harvest management tool (e.g. Roundup)	Diquat as a desiccant (e.g. Reglone)	Saflufenacil as a harvest management tool (e.g. HEAT)	Glufosinate as a harvest management tool (e.g. MPOWER Good HARVEST)	Carfentrazone (e.g. Cleanstart, Aim)	Flumioxazin (e.g. Valtera)
	European Union (EU)					
EX MRLs (e.g. others)	No marketing issues associated with glyphosate residues for peas, lentils or chickpeas in the EU. Although there is an MRL set for the use of glyphosate on beans in the EU, the MRL level is set at a low level of 2 parts per million (PPM) for this crop in this market. Consult with your exporter/processor about dry, edible beans destined for the EU. (This applies to the preharvest use only.) 	No marketing issues associated with diquat residues for peas, lentils, chickpeas, and beans. The MRL is in place for these. Follow label directions to minimize residues and maintain levels below the MRL. 	While there are currently no MRLs that would allow for preharvest use on pulses, approvals of MRLs for peas and beans are in the final stages of review and are expected to be published later this summer (lentils will not have an MRL in place for the 2014 crop, and the product is not registered on chickpeas). For peas or beans destined for the EU, please watch for more information from SPG in coming months. If the MRLs are not in place prior to application, growers and exporters should confer to ensure there will be no marketing problems in the EU. (This applies to the preharvest use pattern only.) 	Lentils are the only pulse crop for which the product is registered in Western Canada. There are no marketing issues associated with glufosinate residues for lentils, as the MRL is in place. Follow label directions to minimize residues and maintain levels below the MRL. 	There is no MRL set that would allow for preharvest use on beans, chickpeas, or peas (not registered on lentils). In cases where crop is destined for the EU, growers and exporters should confer prior to using the product in order to avoid marketing problems in the EU. (This applies to the preharvest use pattern only.) 	No marketing issues associated with flumioxazin residues for dry beans (not registered for harvest aid use on other pulses). The MRL is set. Follow label directions to minimize residues and maintain levels below the MRL. 
	No marketing issues associated with glyphosate residues for peas and lentils. Although there is an MRL set for the use of glyphosate on beans, the MRL level is set at a low	No marketing issues associated with diquat residues for peas, lentils, chickpeas, and beans. The MRL is in place for these. Follow label	No marketing issues associated with saflufenacil residues in CODEX countries. The MRLs are set for pea, lentil, and bean	Lentils are the only pulse crop for which the product is registered in Western Canada. There is no CODEX MRL set for glufosinate on	There is no MRL set that would allow for preharvest use on beans, chickpeas, or peas (not registered on lentils). In cases where the crop is destined for the CODEX countries	There are no CODEX MRLs established for flumioxazin at this time. In cases where the crop is destined for CODEX countries, growers and exporters should

# 2014 grower desiccant advisory table

Market	Glyphosate as a harvest management tool (e.g. Roundup)	Diquat as a desiccant (e.g. Reglone)	Saflufenacil as a harvest management tool (e.g. HEAT)	Glufosinate as a harvest management tool (e.g. MPOWER Good HARVEST)	Carfentrazone (e.g. Cleanstart, Aim)	Flumioxazin (e.g. Valtera)
	European Union (EU)					
	<p>No marketing issues associated with glyphosate residues for peas, lentils or chickpeas in the EU. Although there is an MRL set for the use of glyphosate on beans in the EU, the MRL level is set at a low level of 2 parts per million (PPM) for this crop in this market. Consult with your exporter/processor about dry, edible beans destined for the EU. (This applies to the preharvest use only.)</p> 	<p>No marketing issues associated with diquat residues for peas, lentils, chickpeas, and beans. The MRL is in place for these. Follow label directions to minimize residues and maintain levels below the MRL.</p> 	<p>While there are currently no MRLs that would allow for preharvest use on pulses, approvals of MRLs for peas and beans are in the final stages of review and are expected to be published later this summer (lentils will not have an MRL in place for the 2014 crop, and the product is not registered on chickpeas). For peas or beans destined for the EU, please watch for more information from SPG in coming months. If the MRLs are not in place prior to application, growers and exporters should confer to ensure there will be no marketing problems in the EU. (This applies to the preharvest use pattern only.)</p> 	<p>Lentils are the only pulse crop for which the product is registered in Western Canada. There are no marketing issues associated with glufosinate residues for lentils, as the MRL is in place. Follow label directions to minimize residues and maintain levels below the MRL.</p> 	<p>There is no MRL set that would allow for preharvest use on beans, chickpeas, or peas (not registered on lentils). In cases where crop is destined for the EU, growers and exporters should confer prior to using the product in order to avoid marketing problems in the EU. (This applies to the preharvest use pattern only.)</p> 	<p>No marketing issues associated with flumioxazin residues for dry beans (not registered for harvest aid use on other pulses). The MRL is set. Follow label directions to minimize residues and maintain levels below the MRL.</p> 
EX MRLs (e.g. others)	<p>No marketing issues associated with glyphosate residues for peas and lentils. Although there is an MRL set for the use of glyphosate on beans, the MRL level is set at a low level of 2 parts per million (PPM) for this crop in this market. Consult with your exporter/processor about dry, edible beans destined for the EU. (This applies to the preharvest use only.)</p>	<p>No marketing issues associated with diquat residues for peas, lentils, chickpeas, and beans. The MRL is in place for these. Follow label directions to minimize residues and maintain levels below the MRL.</p>	<p>No marketing issues associated with saflufenacil residues in CODEX countries. The MRLs are set for pea, lentil, and bean desiccation uses (the MRL for chickpeas is not yet established).</p>	<p>Lentils are the only pulse crop for which the product is registered in Western Canada. There is no CODEX MRL set for glufosinate on lentils. Consult with your exporter/processor about dry, edible beans destined for the EU. (This applies to the preharvest use pattern only.)</p>	<p>There is no MRL set that would allow for preharvest use on beans, chickpeas, or peas (not registered on lentils). In cases where the crop is destined for the CODEX countries, growers and exporters should confer to ensure there will be no marketing problems in the EU. (This applies to the preharvest use pattern only.)</p>	<p>There are no CODEX MRLs established for flumioxazin at this time. In cases where the crop is destined for CODEX countries, growers and exporters should confer to ensure there will be no marketing problems in the EU. (This applies to the preharvest use pattern only.)</p>

# Approach to Bilateral Agreements

- Principle of Mutual Recognition and/or MRL Deferral Paths that reference third countries
- Examples:
  - Egypt: Codex, EU
  - Costa Rica: Codex, higher of US or EU
  - United Arab Emirates: Codex, EU
  - Panama: Codex, lower of US or EU
  - Saudi Arabia: GCC, Codex, lower of US or EU
  - Morocco: Codex, EU
- Global Joint Reviews, addressing structural MRL delays
  - Canada-Japan trade negotiations example
  - Trans Pacific Partnership



# International MRL issues, outreach

- 2016 UN International Year of Pulse
  - Linking food security objectives to predictability of trade, public health and sustainability goals
  - Role of International Pulse Trade Confederation
- Forums
  - Codex CCPR, 2015 and 2016
  - FAO Committee on Commodity Problems, 2014-2016
  - International Grains Council? June 2016
  - Other senior FAO meetings, TBA