



MRLs Then and Now

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What MRL Issues have been faced by Fresh Produce Growers and Processors since 2006

- **Growers 2006:**
 - What is a MRL?
 - Why should I care?
 - How do I find out what the MRLs for my crops are?
 - Getting both Growers & PCAs to understand the need for monitoring & controlling MRL levels at harvest
- **Produce Processors/Shippers 2006:**
 - How do we consistently manage MRLs domestically & internationally?
 - Huge complexity in supply chain
 - MRLs—a simple concept, complex in practice and a moving target



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MRL Issues for Fresh Produce Growers and Processors Moving Forward to TODAY

- **Growers:**

- Growers domestically (especially in CA & AZ) have a better understanding of MRLs and the need to monitor by both Growers and PCAs—differs in other states
- PCAs are making more thoughtful recommendations, that include the need to consider MRLs
- Foreign growers are still problematic and very sporadic in compliance due to local practices and complexity/differences in chemical trade names and concentrations for use versus the US
- MRL Database—A powerful tool

- **Produce Processors/Shippers:**

- Development of internal MRL policy and procedures globally (Chiquita/Fresh Express)
- Implementation of 100% MRL testing in Mexico and monthly random MRL testing domestically on all leafy greens
- Global Food Safety Initiative (GFSI) benchmarked schemes require MRL testing in many schemes such as GlobalGAP
- Ongoing MRL training and execution of a plan is a challenge for resources and timing



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What are the current MRL Issues being faced by Fresh Produce Growers and Processors

- **Growers:**
 - Lack of harmonized requirements from buyers
 - Global complexity & distribution of product into supply chain—where is my commodity ultimately going?
 - Continuing education on MRLs and keeping up with constantly changing registration landscape and MRL requirements of countries of destination
- **Processors/Shippers:**
 - Continually changing retail and foodservice buyer requirements and standards
 - Grower/supplier education on MRLs is always an ongoing need
 - Food Safety Modernization Act (FSMA) Supplier Approval requirements in the Produce Rule & Foreign Supplier Verification Rule—what will they look like? Will testing be required? Training & documentation of training will be a critical component
 - Testing while costly will continue to be needed due to GFSI, buyer requirements, and potentially other requirements (i.e. FSMA)



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New & Coming Soon

- Western Growers (WGA) is developing a web based “Toolbox” for growers & shippers for data entry, data storage and data compilation, including information such as MRL changes on the Regulatory section of the apps, for use in audits and to fulfill regulatory requirements—linking current databases into more user friendly apps
- Other produce industry trade associations working on: “big data” management, current array of databases for collection & reporting to customers (retail & foodservice) and regulatory agencies (i.e. Azzule, ICIX, Foodlogiq etc.)
- Development of Quantitative Risk Assessments as part of FSMA



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Thanks—Questions?



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