

# MRL Compliance

Registrant Examples

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# Examples

- ▶ US Tolerance is higher than the MRL in the export market
- ▶ US Tolerance but no MRL in any export market
- ▶ US Tolerance is the Limit of Detection and no MRLs in export markets
- ▶ US EPA registers the product with an exemption from the requirement for tolerance



# US tolerance is higher than MRL in export markets

- ▶ Miticide - EU lowered MRL and Fungicide - US tolerance but few MRLs
- ▶ Evaluate residue data
- ▶ Can reliable decline curve be generated? What would be acceptable growers, processors, food companies, etc.?
- ▶ Use pattern other than US label that will result in residues below export market MRLs or default MRLs where applicable
- ▶ Discussion with commodity groups



# Example of what might be suggested via something like an Information Bulletin

Crop	US	Canada	Europe	Japan	Mexico	Korea	New Zealand
MRL	0.6 ppm	0.1 ppm	0.01ppm	0.5 ppm	0.6 ppm	0.1 ppm	0.1 ppm
PHI	6 days	15 days	Prebloom only	6 days	6 days	15 days	15 days

# US Tolerance no MRLs in any export market

- ▶ Naturally occurring element - insecticide
- ▶ What are residue levels?
- ▶ What is reason no MRLs?
- ▶ Do countries have an “exempt” list?
- ▶ Discussion with export market regulatory authorities
- ▶ Discussion with commodity groups



# US Tolerance is the Limit of Detection and no MRLs in export markets

- ▶ Preemergent herbicide
- ▶ No residues in raw agricultural commodity - even at 5X rate
- ▶ No residues in processed commodity
- ▶ Discussion with commodity groups



# US EPA registers the product with exemption from requirement from tolerance

- ▶ Biological insecticide - plant extract
- ▶ No need to measure residues, no residues of toxicological concern, exemption based on a safety finding
- ▶ Uncertainty on what or if they can test for anything specific
- ▶ Other regulatory authorities may or may not register with an exemption
- ▶ Discussion with commodity groups



# Clarifying Questions - discussion at end of panel presentations

Thank You