

2023 MRL HARMONIZATION WORKSHOP

MEXICAN REGULATORY PERSPECTIVE IN PESTICIDES

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CONACYT WEBINARS & CAMPAIGN



Ciclo de Webinarios: "Los plaguicidas en México: realidad y perspectivas"

En México el uso desmedido de plaguicidas ha causado daños irreversibles tanto en la salud de las personas como en el ambiente.



Conacyt recomienda bajar importaciones de glifosato a 50% en 2022

El presidente Andrés Bernal López (Poder) anunció un decreto a finales del pasado mes de junio para reducir las importaciones de glifosato.



Sader, Semarnat y Conacyt impulsan cultivos libres de glifosato

El gobierno federal anunció un decreto a finales del pasado mes de junio para reducir las importaciones de glifosato.



proccyt.org.mx

GOVERNMENTAL CAMPAIGN VS PESTICIDES AND GMOs

Glyphosate is the most dangerous pesticide in the world

Gobierno de México establece medidas para eliminar uso de plaguicidas de alta peligrosidad

Government of Mexico establishes measures to eliminate highly dangerous pesticides

Con la eliminación gradual del glifosato, México avanza en la defensa de la vida: Semarnat

With the gradual elimination of glyphosate, Mexico advances in the defense of life

Secretaría de Medio Ambiente y Recursos Naturales | 04 de febrero de 2021 | Comunicado

Campaign for self-consumption production

- Guarantee food self-sufficiency to combat the inflationary pressure, and the impact on production from the Russian invasion of Ukraine.
- Promote self-consumption production, it is not only market production... the peasant economy that is very important and that was gradually abandoned... (AMLO).
- He argued that the lesson to be learned from the disruption of supply chains due to the pandemic and intensified inflation due to Russia's invasion of Ukraine lies in the need to produce what is consumed and not depend on foreign countries.



Background

What happened last year?

01

Political operation



Intense government campaign promoting agroecology and against pesticides and GMOs



Political context



Final part of AMLO's six-year term

- Radicalization of government positions.
- Open confrontation with the Supreme Court.
- Intention of constitutional changes in the next 12 months.

02

¿What's going on?

Present day



Elections 2024

- Presidency.
- 8 Governors.
- 1 Head of Government of Mexico City.
- 500 Representatives.
- 128 Senators.
- 30 State Congresses.
- Hundreds of Municipalities.

15 Initiatives related to Pesticides in the LXV legislature

STAND OUT

House of Representatives

Amendments to LGEEPA (Environmental Law)

Senate

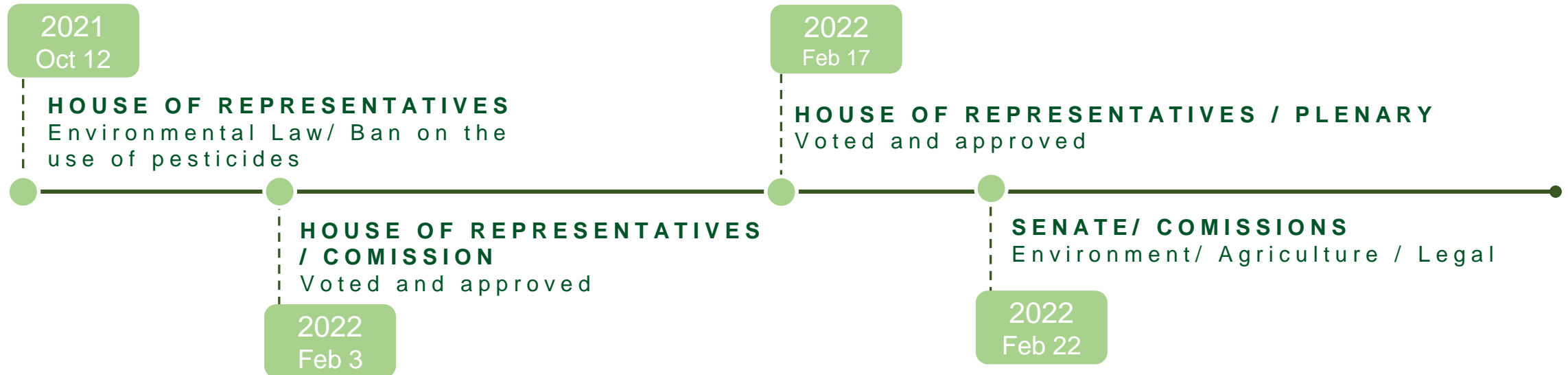
Amendments to LGS (Health Law)

Political context – Congress Activity

MRL's in Mexico

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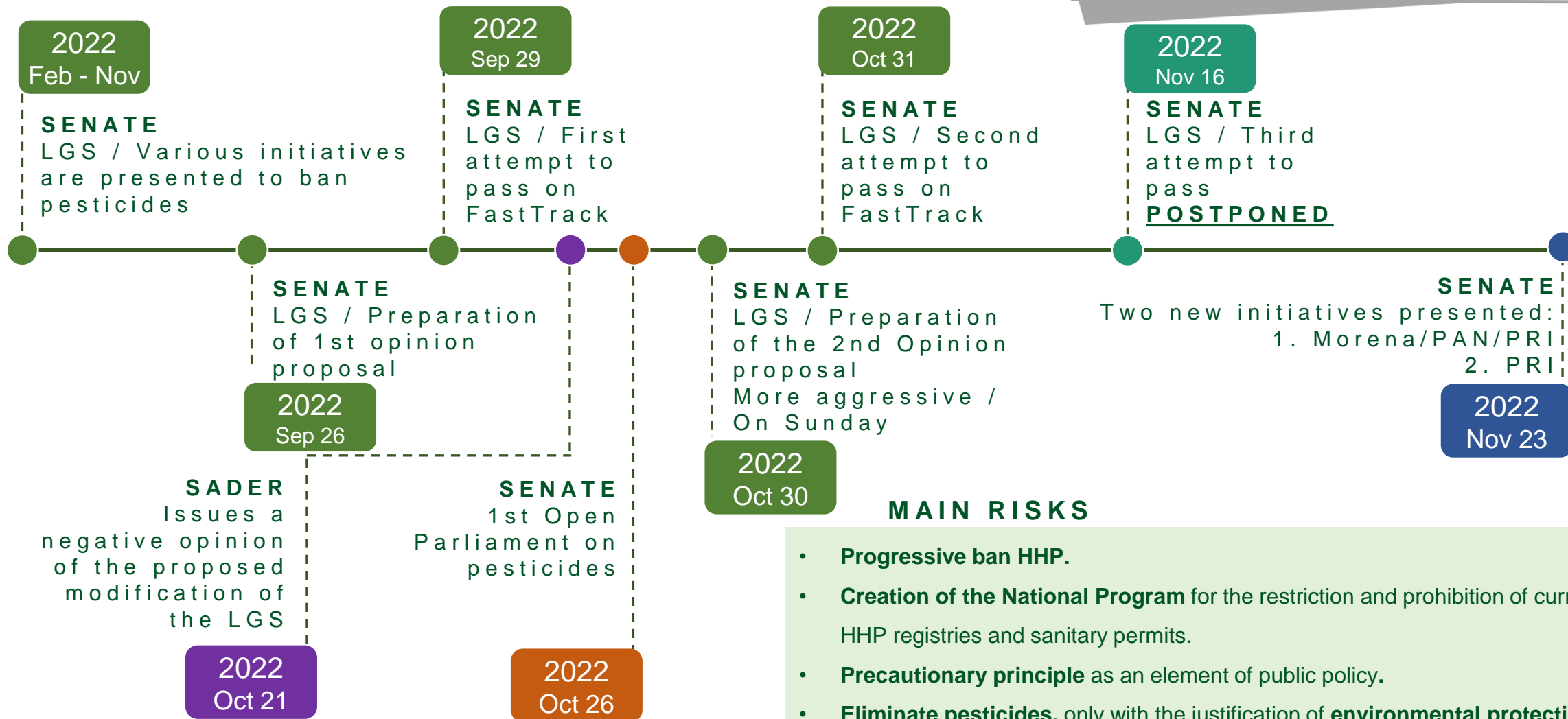
MAIN RISKS

- **Express prohibition of using HPPs**, those that are in international treaties / Term of 4 years
- **Precautionary principle** as national environmental policy.

Political context – Congress Activity

MRL's in Mexico
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Political context – Congress Activity

MRL's in Mexico

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2023

Apr 13

SENATE

Board of Directors of the Senate authorizes change of Commission

2023

Apr 14

SENATE

PROCCYT alerts 12 Senators about the reactivation of the initiative

2023

Apr 18

SENATE

CNA farmers activate lobbying in the Senate to stop the initiative.

Political Context – Regulatory Authority

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Official Mexican Standards (NOM's)



Aerial application of pesticides.

Official Standard Project to establish environmental protection criteria and phytosanitary and sanitary specifications for the aerial application of pesticides.

Phytosanitary services.

Establishing the phytosanitary specifications with which natural and legal persons who manufacture, formulate, import, distribute, market and apply pesticides for agricultural use must comply, as well as the procedure for certification.

Political Context – Regulatory Authority

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Regulatory perspective

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Regulatory processes COFEPRIS

Kind of Procedure	Total number of submissions	Submissions solved	Submissions delayed	Submissions on time	% Delayed
New Records	423	20	367	36	87%
Extensions	199	73	125	1	63%
Technical modifications	562	29	470	63	84%
Administrative modifications	328	52	275	1	84%
Total	1512	174	1237	101	82%



Validamos resultados exitosos de [#TransiciónAgroecológica](#) en producción de maíz 🌽👨🌾, con ahorros considerables en costos respecto de la producción con agroquímicos, y sobre todo ¡cosechas saludables! con cuidado del medio ambiente.



Pesticide regulations – Legal Framework

General Health Law

Regulation on registries, import and export certificates of pesticides, plant nutrients and toxic or danger substances.

Official Mexican Standard NOM-182-SSA1-1998, Labeling of plant nutrients.

Official Mexican Standard NOM-232-SSA1-2009, requirements for the container, packaging and labeling.

Other Decrees and Agreements

Competent authorities



MRL's – Legal Framework

Competent authorities

NOM-082-SAG-FITO/SSA1-2017. Maximum residue limits. Technical guidelines and authorization and review procedure.



MRL's – Legal Framework

How is an MRL established?

According to NOM-082, the required MRL must be proposed in the chemical pesticide registration application. Once the registration of the pesticide is authorized, the proposed MRL is considered authorized.

Authorization of MRLs can be based on the following sources:

- Field studies
- codex
- EPA
- PMRA
- EU
- OECD
- Brazil, Argentina and Japan
- Those generated for Mexico, derived from field studies of the indicated countries.
- MRLs that come from any of the cited sources may be adopted for our country only when its use pattern is comparable to that which will be recommended in Mexico.

MRL's – Legal Framework

How is an MRL established?

Residues must represent an acceptable risk. An acceptable risk is considered when it is determined that the TMDI (Total Maximum Daily Intake) of pesticide residues is less than or equal to 100% of the ADI (Acceptable Daily Intake).

The MRLs that come from CODEX, EPA, PMRA, EU, OECD, BR, ARG, JPN, must:

- Be current according to the source taken as a reference, at the time they are proposed for adoption in our country, and
- Correspond to the same pesticide/crop or pesticide/crop group combination declared in the source for which the MRL is being cited. In the latter case, the MRL will be approved for that group of crops.

MRL's – Legal Framework

How is an MRL reviewed?

The MRL of the pesticide/crop(s) combination that was authorized will remain in force, unless through the review process it is revoked, modified, canceled or has lost its validity.

The MRL may be reviewed in the following cases:

- When the reference source that served as the basis for the MRL for the pesticide-crop combination authorized in our country, publishes its revocation, modification, cancellation or loss of validity.
- When COFEPRIS, in the exercise of the powers conferred on it by the applicable legal provisions, at any time performs a new analysis of dietary risk, to verify the risk conditions and concludes that the IDMT is greater than 100% of the ADI.
- When derived from the National Residue Monitoring Program implemented by the competent authority, evidence is collected to verify that the authorized MRL for a certain pesticide/crop(s) is being continuously exceeded and it is verified that the pesticide is being used in compliance with the instructions for use established in the respective label. If the MRL is continually being exceeded due to non-compliance with the directions for use on the label, the MRL will not be subject to revision.

Thanks for your attention;

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