



Agriculture Division of DowDuPont™

Global Trends in Import Tolerances

2018 MRL HARMONIZATION Workshop, San Francisco, May 30-31

CARMEN TIU - GLOBAL MRL & IT LEADER

Presentation Outline

1. MRL Evolution
2. Current status for Import Tolerances (IT)
3. Examples of streamlined Processes
4. Food for thought

MRL Evolution

Since 1970's to Today ... and to a potential future!

1970's

- GAP Enforcement
- MRL for domestic uses

1980's

- Risk required to support MRL
- MRL used as safety standards

2000's

- Trade increases exponentially
- Import Tolerances needed in countries without domestic MRL

2016

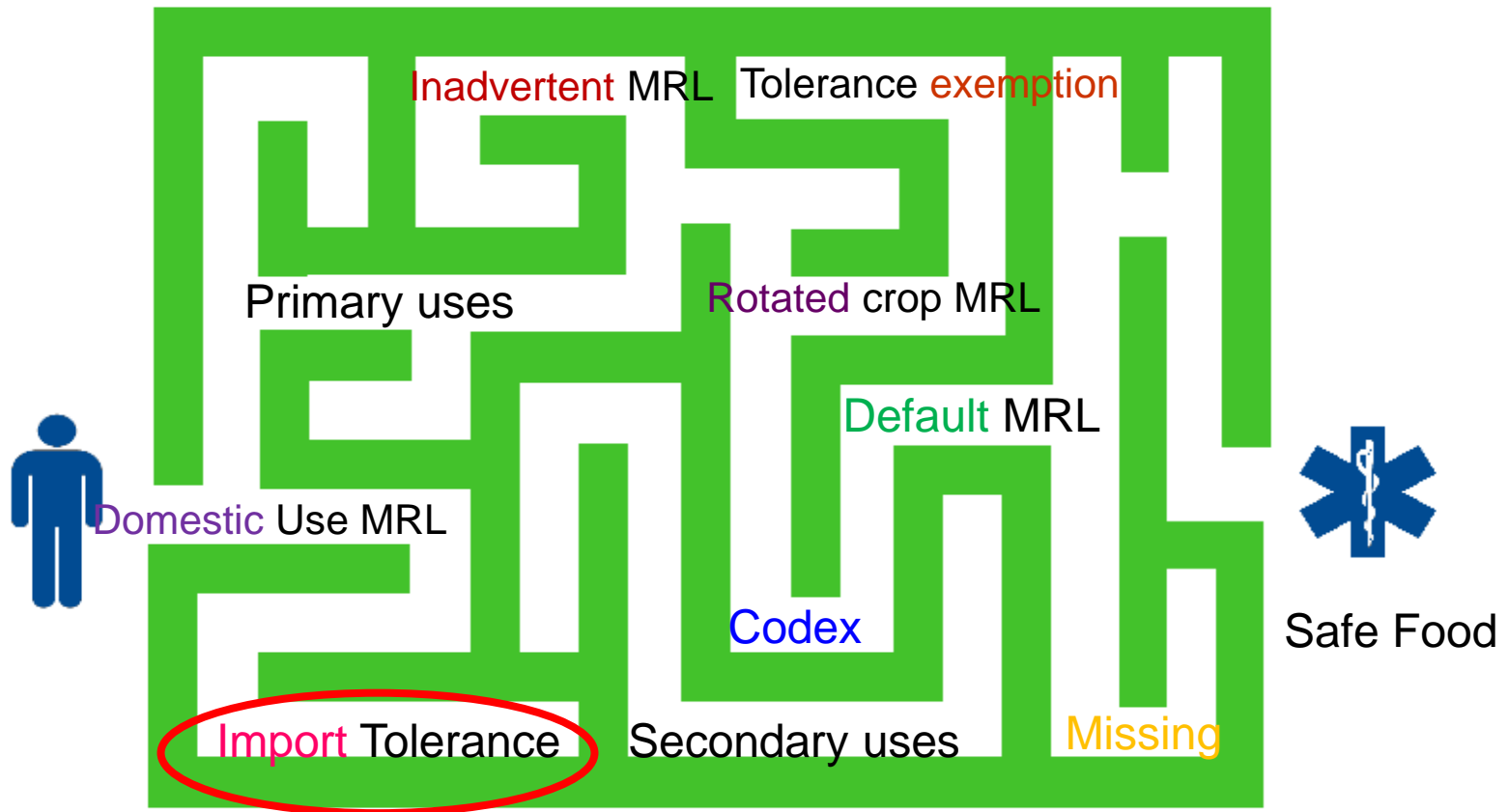
- Australia & New Zealand regulation for "other-foods"
- WTO address needs for Missing MRL

Next

MRL recognized as IT in importing countries (based on risk)
Food-chain need regulatory uniform thresholds for all foods

Navigating the MRL Maze

One set of residue data may trigger multiple MRL standards



Current Status - Import Tolerances

EXPONENTIAL INCREASE IS NOT SUSTAINABLE!

- Trade of fruits & vegetables has grown 2,700 fold in the 1st decade of the new millennium
- Registrants submissions for IT
 - Single digits in the year 2000
 - Double digits 2005-2010
 - Triple digits after 2015
- This increase is not sustainable for registrant and agencies!

Streamlined IT Processes

EXAMPLES

1. APEC 2016 Guideline

- A. Australia & New Zealand –done!
- B. USA EPA pilot – successful!
- C. Korea, Canada – accept other agencies review

2. Principle: accept country of origin agency review report and corresponding MRL

Set MRL as IT, if risk to consumers is acceptable

3. Countries accepting export country MRL, if no local MRL

- Mercosul (Brazil, Argentina, Chile), China.

4. Benefits: best way for MRL harmonization & enables trade



Emerging regulations for “other-foods”

AUSTRALIA & NEW ZEALAND

Agricultural Chemicals & Veterinary Medicine Data Requirements 41

if treated crop and/or the residue may accumulate over several seasons

Food Standards ANZ proposal P-1027, Oct.2016 – Managing low levels of Ag and Vet chemicals without MRLs

Case-by case analyzed 132 of 500 registered actives, 17 had MRLs set on “*All other foods, except animal commodities*”

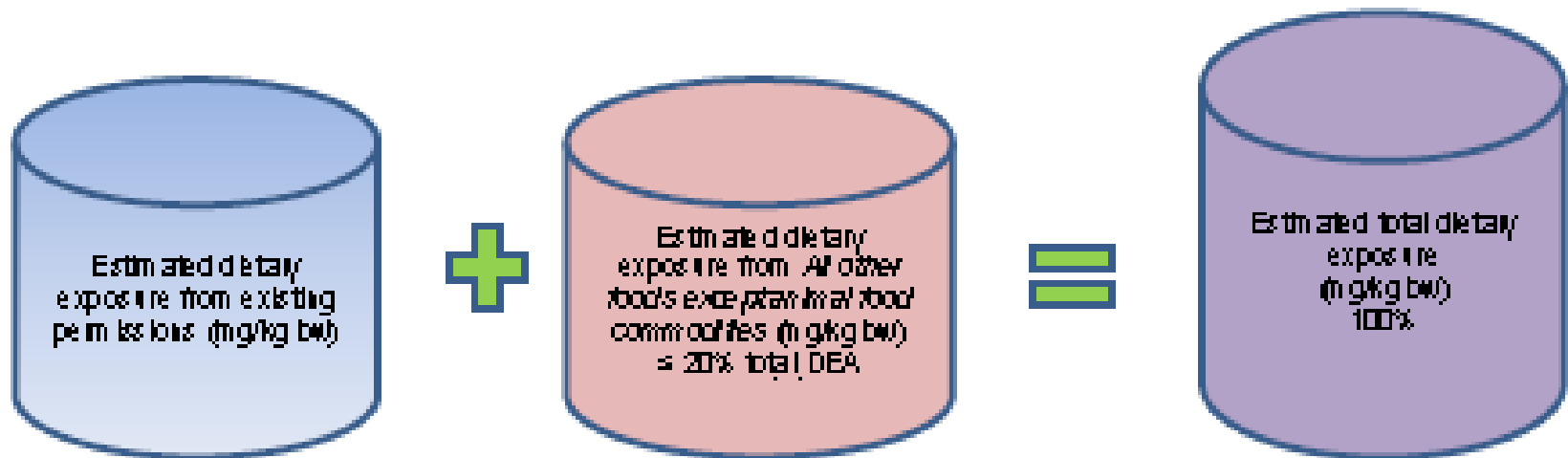
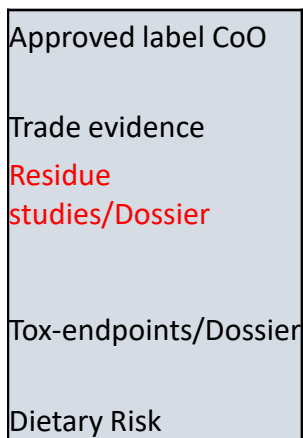


Figure 1: Percentage contributions of All other foods except animal food commodities to total

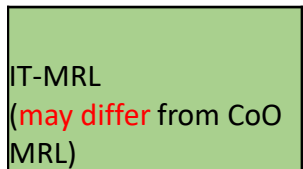
Ideal Process for Global MRL & IT

SYNCHRONIZED IT & CODEX PROCESSES

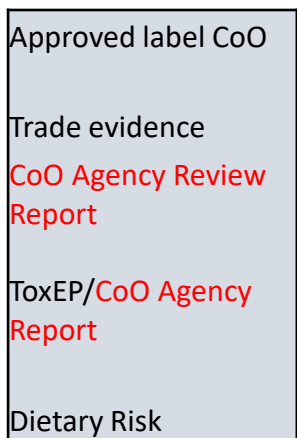
REGULAR IT-MRL Codex MRL



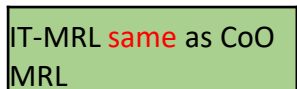
1-2 years review



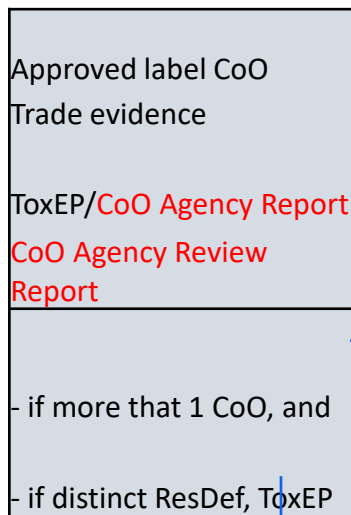
APEC IT-MRL



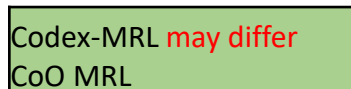
~ 6 months review



JMPR APEC-like

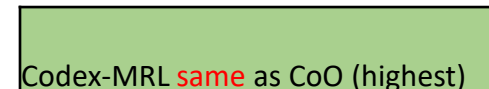
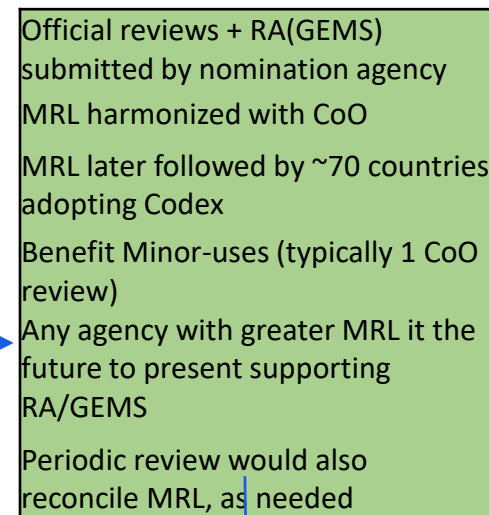


1 year regular JMPR review



Fast Track CCPR

(RA only for WHO-GEMS,
by CoO agency official)



Note: CoO-country of origin; ToxEP - tox endpoints

INPUTS

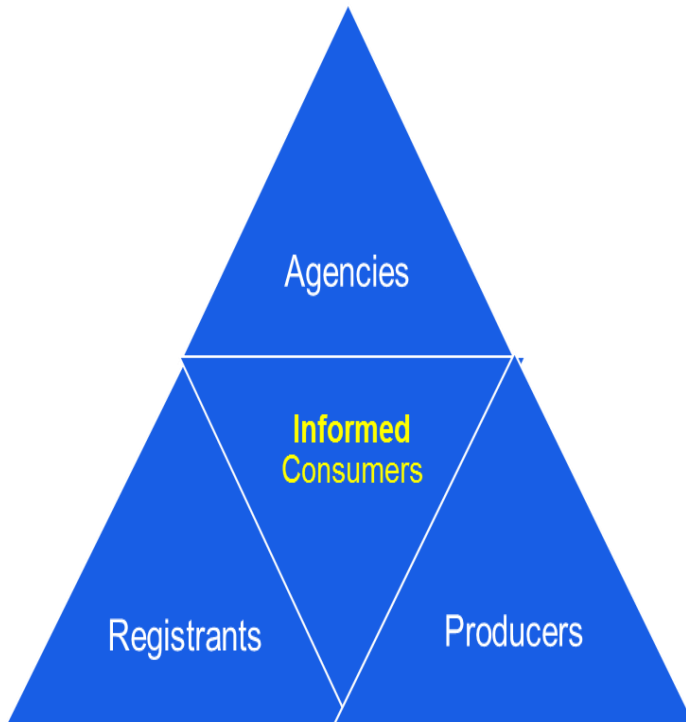
OUTPUTS

Food for Thought: 2 choices

MRL's are TRADE standards, they ensure food safety and harmonization

2. KEEP RUNNING THE MRL MAZE!

1. NEED SYNCHRONIZED EFFORTS



Many thanks for the opportunity and attention!

Questions and comments are very welcome!

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