

Canadian Maximum Residue Limits (MRLs) Update

MRL Harmonization Workshop

May 22, 2024

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Purpose

Update since resuming consultations on proposed MRL **increases (June 2023)**

- Background – Reason for pause on publishing proposed MRL increases (PMRLs)
- What We Heard – Concerns about MRLs
- Responding to what we've heard
- New digital products on MRLs
- Recent documents proposing MRL increases
- Continuing to respond

Pause on Proposed MRL Increases

- On August 4, 2021, the Ministers of Health, Agriculture and Agri-Food, and Environment and Climate Change announced that the Government of Canada would be **pausing any proposed increases to MRLs** on pesticides
- This pause was put in place in **response to public concerns regarding a proposed increase to the MRLs for glyphosate** for certain imported commodities, which would have brought Canada into alignment with those specific glyphosate MRLs set by the Codex Alimentarius Commission
- The pause was announced as part of a **broader commitment to strengthen the pesticide review process** in Canada, address public distrust and misinformation regarding science-based decision-making, and improve the transparency of review and decision-making processes
- The pause on MRL increases provided an opportunity for Health Canada's Pest Management Regulatory Agency (PMRA), in collaboration with its partners, to review processes, hold consultations with stakeholder groups, and evaluate how the Government can further improve its **communications** on MRLs and support enhancing **transparency and building trust**

What We Heard – Concerns About MRLs

Throughout numerous engagements, PMRA has heard many comments surrounding MRLs. A summary of what we heard was used to guide our actions, including lifting the pause on MRL increases.

- **More information needed on the scientific process:** Provinces/Territories and Non-Government Organizations (NGOs) supported the science process used by PMRA to assess and register pesticides, including establishing MRLs and signaled the need to know more about the review process and how it all fits together
- **Misunderstanding of MRLs and their role:** Concerns raised over MRLs, and particularly on proposed increases to MRLs, often stem from misunderstanding of what MRLs are. For example, there is a misperception that an increased MRL for imported commodities correlates to increased pesticide use in Canada
- **Understanding pesticide residue monitoring and MRL compliance:** Despite robust testing and consistently high levels of MRL compliance over many years for both imported and domestic food commodities, there is still the misperception that any amount of pesticide residue detected on food commodities is of concern
- **Better communication of proposed and final decisions:** Stakeholders desire better communications and transparency around MRL decisions and the underlying data
- **Concerns specifically about Glyphosate:** Concerns raised are often specific to glyphosate and the proposed MRL increases for certain imported commodities to align with other international jurisdictions. There are also concerns about the widespread use of glyphosate in Canada, rather than glyphosate MRLs specifically

Responding to what we've heard

- During the pause, numerous actions were taken, including:
 - Increasing the availability of information online for Canadians to better understand the science behind the decision-making process for pesticides in Canada, including through **updated web pages for Public Registry Consultations, and Decision pages**;
 - Implementing changes to policy through a Notice of Intent (NOI2022-01) to **release the name of applicants**, including for MRL applications;
 - Established a **dedicated science communications unit** to support the development of plain language communications products to explain decision-making related to pesticides, including creating products specific to MRLs, in a way that is relevant and easy to understand;
 - Initiated **water sampling**, including groundwater to inform decisions, including on MRLs;
 - Published a **series of new user-tested web content** on what MRLs are, how they are set, alignment with International MRLs, shared responsibility for food safety, and communicating about MRLs;
 - Published a **new user-tested infographic, video and collaborated with Agriculture and Agri-Food Canada (AAFC) on a podcast** explaining MRLs to a public audience.

Responding to what we've heard – cont'd

MRL Technical Working Group (TWG) with Registrants, Growers, Canadian Food Inspection Agency (CFIA), Agriculture and Agri-Food Canada (AAFC) & NGOs:

Topics and Recommendations:

- Feasibility and practicality of establishing separate MRLs for domestic and for imported food commodities
 - A single MRL was generally preferred, except by some NGOs, as a single MRL approach is supported internationally, is consistent with most countries (U.S. EPA, EU, Mexico, Australia, New Zealand, Japan) given that the highest approved MRL does not pose a human health concern and is practical and efficient for enforcement and trade.
- Incorporating international / foreign standards into MRLs or import tolerances
 - Consider alignment with Codex or major trading partners, such as the US, when establishing MRLs, if health risks are acceptable.
- Implement a notification process for import MRL requests
 - Recommended a public notification process for import MRLs/Tolerances that clearly identifies the organization that files the application and the rationale for the new or amended MRL.
- Continuous oversight for MRLs
 - TWG recognized that MRLs were already considered as part of the dietary risk assessment, each time a new use, re-evaluation, or special review is conducted and recommended to make information more accessible about when MRLs were last reviewed.

New Digital Products on MRLs

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Maximum residue limits, human health, and food safety

Overview | Infographic on MRLs | How MRLs are set

Shared responsibility | MRLs outside of Canada | Communicating about MRLs

A maximum residue limit (MRL) is the highest amount of pesticide residue that may remain on or in food when a pesticide is used according to label directions.

MRLs are legal and enforceable limits set for the different combinations of pesticides and foods, or crops, in Canada. For example, if the same pesticide is used on apples and potatoes, the different crops may have a different MRL listed because they are applied to the crops differently.

Health Canada's scientists carefully review a wide variety of scientific data and information when setting pesticide food safety standards to keep everyone healthy. Pesticides play an important role in growing food but can only be used in Canada if the pesticide has been shown to meet Health Canada's requirements for protection of health and the environment.

As part of the MRL setting process for a pesticide, our scientists evaluate the toxicity of a pesticide and conduct a risk assessment that looks at the diets of people in Canada. This includes vulnerable populations like infants, seniors, children, and pregnant people.

Pesticides are used on food grown using conventional and organic practices to maintain food quality or prevent damage caused by pests, including insects, weeds, and fungal diseases. This ensures Canada has a secure supply of healthy food.

Pesticide residues are small amounts of conventional or organic pesticides that may stay on or in the food. They can get in or on our food when:

- they are applied to crops we eat, like fruits and vegetables,
- we make processed foods, like juice, from crops treated with pesticide, or
- we eat dairy or meat products from livestock animals that have eaten crops treated with pesticides.

Pesticide residues also break down over time, so by the time the food reaches your table there can be very small amounts of pesticide residues left on your food. Typically, the amount of pesticide residue on a food or crop is lower than the limit set for that specific combination of pesticide and food or crop.

Series of new user-tested web content on what are MRLs, how they are set, alignment with International MRL setting, shared responsibility for food safety, and communicating about MRLs. [Maximum residue limits, human health, and food safety - Canada.ca](https://www.canada.ca/en/health-canada/services/pesticides-pest-management/pesticides-food-consumer-product-safety/maximum-residue-limits-human-health-and-food-safety.html)

Maximum residue limits (MRLs) in Canada

Health Canada's scientists protect your health by setting safety standards on how much pesticide residue could be found on the food you eat. The reason pesticides are used on crops is to help protect them from weeds, fungi and insects. This allows you to access high-quality nutritious food.

What is an MRL?

A maximum residue limit (MRL) is the highest amount of pesticide residue that may remain on or in a food when a pesticide is used properly. MRLs are legal and enforceable limits based on how pesticides are used.

Is the food I'm eating safe?

MRLs are used to check if pesticides are being used properly. The level of pesticide residues that could be on or in foods grown or imported in Canada must be low enough to not harm you.

For example, you would have to eat about 280 apples every day, for your whole life, for there to be a health concern related to pesticide residues. That many apples can almost fill a shopping cart.

Using apples as an example, this number is based on the highest amount of pesticide residue detected on an apple in Canada.

How are MRLs set?

Protecting health and environment
Before setting an MRL for a given pesticide on a food, Health Canada scientists evaluate the pesticide to ensure that it can be used in a way that protects human health and the environment, while effectively managing pests.

Examining exposure
Next, they examine the amount of a given pesticide residue you might be exposed to on or in your food. This potential exposure looks at all food you might eat in a typical day and the variety of food you may eat over your lifetime.

New user-tested infographic explaining MRLs to a public audience. [Infographic on MRLs in Canada - Canada.ca](https://www.canada.ca/en/health-canada/services/pesticides-pest-management/pesticides-food-consumer-product-safety/maximum-residue-limits-human-health-and-food-safety.html)

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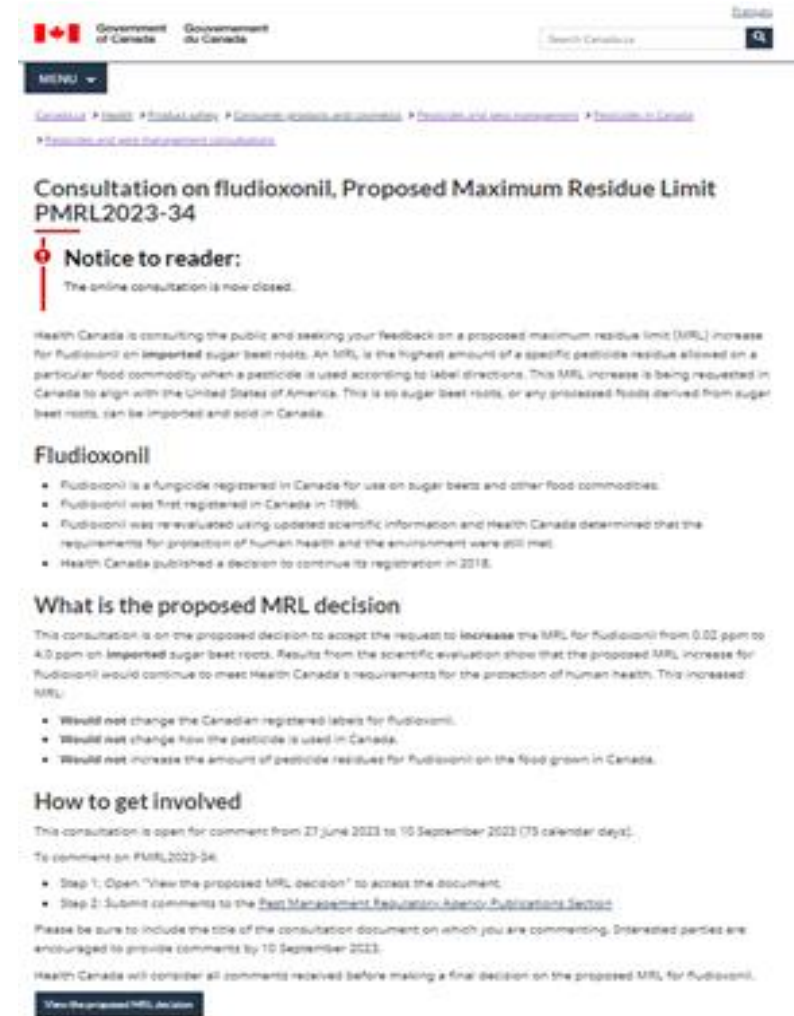
MRL video explaining MRLs to a public audience, including information on acceptable daily intake. [Maximum Residue Limits for pesticides in Canada - Canada.ca](https://www.youtube.com/watch?v=...)

Lifting the Pause on Proposed MRL Increases

- On June 20, 2023, Health Canada **announced the lifting of the pause on proposed increases to MRLs** for pesticides.
- This was done to support predictability for agriculture and trade, provide tools to fight against new pests, and demonstrate the scientific integrity of the pesticide regulatory framework in Canada.
- To date, 5 PMRL documents proposing MRL increases have been published for consultation:
 - June 27, 2023, [PMRL2023-34: Fludioxonil](#)
 - imported sugar beet root – post harvest use
 - July 20, 2023, [PMRL2023-38: Azoxystrobin](#)
 - imported sugar beet root – post harvest use
 - August 15, 2023, [PMRL2023-40:Tolfenpyrad](#)
 - new, decreased and increased MRLs on a variety of imported commodities
 - October 10, 2023, [PMRL2023-44:Pyriofenone](#)
 - new, decreased and increased MRLs for domestic use in greenhouses
 - December 13, 2023 , [PMRL2023-46: Cyclaniliprole](#)
 - increased MRL for domestic use in greenhouses

Lifting the Pause on Proposed MRL Increases – cont'd

- Consultations for proposed increases to MRLs, include:
 - An updated consultation notice with a plain language summary of the proposed decision
 - More clarity and information in the consultation report such as:
 - Additional science information in the proposed MRL documents (PMRLs) with more details on the health risk assessment to better reflect the robustness of the science underpinning the proposed MRLs
 - Additional background information on pesticides, in general, as well as the purpose of the proposed MRL increase in particular
 - Addition of more explanatory plain language text on some of the technical details of the MRL setting process to allow more meaningful engagement of interested parties.



The screenshot shows the Health Canada website page for a consultation on fludioxonil. The page title is "Consultation on fludioxonil, Proposed Maximum Residue Limit PMRL2023-34". A red banner with a white exclamation mark icon and the text "Notice to reader: The online consultation is now closed." is prominently displayed. Below this, the text states: "Health Canada is consulting the public and seeking your feedback on a proposed maximum residue limit (MRL) increase for fludioxonil on imported sugar beet roots. An MRL is the highest amount of a specific pesticide residue allowed on a particular food commodity when a pesticide is used according to label directions. This MRL increase is being requested in Canada to align with the United States of America. This is so sugar beet roots, or any processed foods derived from sugar beet roots, can be imported and sold in Canada." The page is divided into sections: "Fludioxonil" with bullet points about its registration and re-evaluation; "What is the proposed MRL decision" with a paragraph and bullet points explaining the decision; and "How to get involved" with a paragraph and a list of steps for commenting. A "View the proposed MRL decision" button is at the bottom.

Continuing to respond

- **Proposed increases to MRLs** now use the updated Consultation Notice and Consultation Documents (enhanced PMRL documents)
- **Released a [second series of web content](#)** on key areas of concern to stakeholders on the pesticide regulatory process and expanding on the details of the types of studies used in a dietary assessment and the dietary risk assessment process
- Release a series of **data storytelling products** to highlight the role of MRLs in food monitoring. For example:
 - An infographic with companion html text
 - A data visualization collaboration with CFIA and Public Health Agency of Canada's (PHAC) InfoBase
- **Additional user testing** to learn more about our user's information needs and content preferences. For example, testing the data storytelling products and the plain language PMRL consultation notices and reports with users.
- Provide **additional context and links to MRLs through the National Chemical Residue Monitoring Program (NCRMP)** of the CFIA
- **Launched new [public notices](#) for import MRL applications** to inform the public when an application for an import MRL has been received, supporting early notification and preparation for upcoming consultation

Update on final decision to glyphosate PMRL for certain imports

- **No decision on glyphosate PMRL2021-10 will be released before late 2024.**
 - PMRA continues to review stakeholder feedback and prepare responses to the comments received.
 - Input will be sought from PMRA's independent Science Advisory Committee on Pest Control Products (SAC-PCP) in late June, 2024 on the scientific evidence, explanations and rationales in its responses to public comments on MRLs, such as those received for the Glyphosate PMRL.