



# ***MRLs:*** What do they mean for domestic retail and export markets

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# *Maximum residue limits*

- The maximum amount of pesticide residue that is legally allowed to remain in/on food when a pesticide is used according to the label (Good Agricultural Practice)
  - Based on supervised residue trial data (critical GAP)
- Lack of compliance – loss of market access

# *Maximum residue limits*

- Ensuring export compliance can be challenging
- MRLs vary between countries
  - Different use patterns (differing pest/disease spectrums)
  - Different regulatory frameworks
  - Different registrant priorities

# MRL Differences

## ■ Differing use patterns

Compounds	Australia	MRL	USA	MRL
bifenazate	31.2 g ai/hL WHP: 7 days	<b>2</b>	560 g ai/ha WHP: 7 days	0.7
etoxazole	3.85 g ai/hL WHP: 7 days	0.2	150 g ai/ha WHP: 14 days	0.2
fluxapyroxad	3 x 6 g ai/hL WHP: 0 days	0.7	4 x 100 g ai/ha WHP: 0 days	<b>0.9</b>
indoxacarb	6 x 7.5 g ai/hL WHP: 14 days	<b>2</b>	4 x 125 g ai/ha WHP: 14 days	1
mancozeb	? x 160 g ai/hL WHP: 14 days	<b>3</b>	4 x 5.4 kg ai/ha WHP: 77 days	0.6
spirotetramat	3 x 9.6 g ai/hL WHP: 21 days	0.5	160 g ai/ha max 440 g ai/ha WHP: 7 days	<b>0.7</b>

# ***MRL Differences***

- Different regulatory frameworks
  - **Assessment**
    - Hazard vs Risk based
  - **Enforcement**
    - Zero tolerance vs  $\pm$  (measurement uncertainty)
  - **Reconsiderations/Re-evaluations**
    - National and International
    - New & refined risk assessment methodologies

# *MRL Differences*

- Differing registrant priorities
  - Market differences
    - Between 2008 – 2012

Compounds	Australia	USA
26	56	149

# *MRL Differences*

- What does this mean?
  - Complying with Australian MRLs does not ensure compliance internationally

# ***MRL Differences – How to manage***

- MRL alignment? - Complicated
  - Reference MRLs
    - Codex MRLs &/or Other jurisdictions?
  - Bilateral agreements?
- Import MRLs?
  - Lack of capacity in some countries
  - Costs - Data generation & application fees



# *MRL Differences – How to manage*

- Amend local use patterns?
  - Data needed...
    - Registrants
    - Trials
  - Residue monitoring data
- End result
  - Potentially fewer options available
  - Pest and disease management more problematic

# *Potential impact of re-evaluations*

## ■ Example

### □ Dithiocarbamates

- APVMA ~2021/22?
- **Canada** – metiram only one use retained; thiram all food uses cancelled; Ziram all uses cancelled mancozeb?
- **Codex** review scheduled for 2021
- **EU** – thiram & propineb deregistered

# Regulatory risk assessments

- Aid industry in strategic planning

Apple regulatory risk assessment			
Problem	Active Constituents	Chemical Group	Comment
<b>DISEASES</b>			
Alternaria leaf blotch/fruit spot	Boscalid + pyraclostrobin	<b>7 + 11</b>	
	Dithianon	<b>M9</b>	EU: Restricted use to non-edible crops
	Fluopyram +trifloxystrobin	<b>7 + 11</b>	
	Metiram	<b>M3</b>	APVMA - Nominated for review Canada – Proposed cancelling of foliar uses Codex - To be reviewed 2020/21
Bactericide	Iodine (Po) <sup>4</sup>	-	
Bitter rot	Copper	<b>M1</b>	
	Dithianon	<b>M9</b>	EU: Restricted use to non-edible crops
	Mancozeb	<b>M3</b>	APVMA - Nominated for review Canada – Under review Codex - To be reviewed 2020/21
	Metiram	<b>M3</b>	APVMA - Nominated for review Canada – Proposed cancelling of foliar uses Codex - To be reviewed 2020/21
	Zineb	<b>M3</b>	APVMA - Nominated for review Codex - To be reviewed 2020/21
	Ziram	<b>M3</b>	APVMA - Nominated for review Canada – Proposed cancelling of all uses Codex - To be reviewed 2020/21