

NAEGA Statement on Pesticide Residue Management



Sustainable and efficient trade of grains, oilseeds and other agri-bulks for food, feed or processing is increasingly threatened by use of non-tariff trade barriers that are not grounded in science, are not proportionate to risk and are driven by political objectives.

The use of pesticidal products, which include insecticides, fungicides, rodenticides, and herbicides, is necessary and may result in residues in agricultural products. These residues may be regulated to ensure that agricultural products that may contain them are not harmful to human, animal, or plant life or health. Regulation often includes a requirement that a chemical compound or the active ingredient/substance in a pesticide be approved for use and may establish a maximum residue level (MRL) for each specific pesticide/crop combination. A MRL is the highest level of a given pesticide's residue on a given crop that is legally tolerated in a government's jurisdiction. MRLs are set during the official registration of a crop protection product and get a regular review. Management of pesticide residues, including the use of MRLs plays an important role in providing for safe grains, feed and oilseeds entering the food value chain. Unfortunately, impediments to trade of grains, feed and oilseeds result when countries implement measures like MRLs that are either zero, near-zero or missing. Unmanageable risk is often the result. In turn trade is disrupted.

Tens of thousands of MRLs exist worldwide and largely each MRL is specific to a pesticide/crop combination. Stakeholders throughout the world's agricultural supply chains are concerned with the differences in MRLs across markets, including when they are missing or low. However, what constitutes a "missing" or "low" MRL is not strictly defined by the agricultural trade community. Generally, agricultural exporters consider MRLs to be "missing" when a market to which they wish to export does not have an MRL for the pesticide/crop combination that they use/produce. There are several reasons why MRLs may be missing in a particular importing market. For example, a particular pesticide may not be registered in the market for use on any crops, or if the pesticide is registered for use, it may not have an established MRL for a specific crop, or the market may not have adopted an existing Codex MRL for a pesticide/crop combination.

Some approaches to management of pesticide residues create significant and unnecessary challenges to the supply of grains, oilseeds and other agri-bulks. Changing and uncertain policy governing pesticide residues often are inconsistent with best practice and are not harmonized. The associated uncertainty and trade distortion, negatively impacts supply chains for the products NAEGA member's ship. Policy inconsistencies may include:

- MRLs intended to protect a country's domestic producers.
- Non-science-based propaganda leading to the establishment of inappropriate pesticide residue management that restricts trade.
- A web of ever-changing regulations and enforcement.
- A lack of utilization of the Codex Alimentarius Commission's (Codex) international food standards, such as MRLs. Whilst not perfect, Codex provides a model, that if followed by countries without national systems, like the United States' system, would help standardize food safety as well as fairness among agricultural importers and exporters.

All users of NAEGA Information and Services Expressly Understand and Agree to indemnify and hold harmless, NAEGA, their officers, employees and agents from any and all liability including claims, demands, losses, costs damages, and expenses of every kind and description, or damages to persons or property arising out of or in connections with or occurring during the course of interaction with NAEGA.

NAEGA Statement on Pesticide Residue Management

NAEGA member's commitment to a first and absolute priority of providing for safe product is achieved by working to support strict compliance with pesticide residue management regulations. For the products NAEGA members supply, compliance with pesticide residue management regulations that are missing or unrealistically low restricts access and increases costs for consumers, producers and the industry.

Grain, feed, oilseeds and other agri-bulks sourced from the US and Canada as well as other jurisdictions with proven effective, resilient, and responsible food safety management regimes meet this highest of standard for safety. The products NAEGA members export from these countries is no different than that consumed domestically. Supplies from countries with proven and effective safety regimes for pesticides should be accepted globally for import and if import MRLs are used, the applied MRLs should be consistent with the national MRLs in the export market - not necessarily the MRLs applied to domestic production in import markets. Additionally, supplies from any country should not be subject to import MRL regimes that are not established with strong science risk assessment, and least trade distortive measures.

NAEGA actions to advance better practice related to MRLs include:

- A. Encourage Governments to address Maximum Residue Limits in global, regional and bilateral agreements impacting trade that:
 - Ensure MRLs incorporate risk assessment and measurement that is science-based.
 - Provide for MRLs for imported commodities which are no more stringent than MRLs for domestically produced commodities.
 - Require sufficient notice and grace periods to facilitate contracted shipments prior to implementation of a new MRL.
 - Provide NAEGA the opportunity for feedback on proposed MRLs prior to implementation.
 - Establish a process to request a higher import MRL using scientific evidence and risk analysis.
 - Ensure MRLs will not be used to manage trade.
- B. Bolstering support for Codex by:
 - Providing for more government experts and budgetary resources to Codex.
 - Reducing the delay between registration of a compound and establishment of a Codex MRL.
 - Increasing the use of crop grouping and representative commodities for establishing MRLs.
 - Strengthening the implementation of procedures and communication between the Codex's Committee on Pesticide Residues and the Food and Agriculture Organization/World Health Organization's Meeting on Pesticide Residues.

Published July 9, 2021

All users of NAEGA Information and Services Expressly Understand and Agree to indemnify and hold harmless, NAEGA, their officers, employees and agents from any and all liability including claims, demands, losses, costs damages, and expenses of every kind and description, or damages to persons or property arising out of or in connections with or occurring during the course of interaction with NAEGA.