



Modernizing the Regulation of Pesticide Residues on Food Commodities

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How Canadian MRLs are determined

- In North America, all MRLs are calculated using a common, predictable, statistical method based on scientific data
 - *NAFTA Guidance Document for Setting Pesticide Tolerances Based on Field Trial Data*, Sept 2005, USEPA-OPP and HC-PMRA
 - Evaluations of the same data package (e.g. NAFTA joint reviews) should result in identical MRLs in both countries.
- MRLs are only established if there is reasonable certainty that no harm will result from exposure at the proposed levels
 - Special consideration given to sensitive sub-populations such as infants and pregnant women



The drive to modernize MRL regulation

- Until recently, the administrative process for legally establishing pesticide MRLs was expensive and cumbersome
 - Canada Gazette process (18 months)
- Use of a General MRL (GMRL) of 0.1ppm was felt to be too permissive and not reflective of international approaches, particularly of our major trading partners
 - US – no GMRL;
 - EU – GMRL of 0.01ppm
- Many MRLs reflect only Canadian GAP and do not consider the GAP in the countries in which much of Canada's food is produced.



Progress on Modernizing Canadian MRLs

1. The administrative process for establishing MRLs has been made more efficient under the *Pest Control Products Act* (less than 6 months including 75 day WTO consultation).
2. Science-based MRLs continue to be established, consistent with the goal of reducing reliance on GMRL and encouraging registration to support Canadian producers where appropriate (e.g. grower requested priority registrations).
3. Modern scientific techniques such as crop groupings are used to improve the efficiency of the assessment process.
4. Current re-evaluation program to amend MRLs where risk is a concern or for obsolete uses.



Posting of Official MRLs on the web

Common Name	Maximum Residue Limit (ppm)	Food Commodity	MRL Established Via
Imidacloprid	0.05	Rapeseed (canola)	Canada Gazette II Prior to 16 June 2008
Imidacloprid	2.5	Raspberries	EMRL2008-23 (3 September 2008)
Imidacloprid	0.5	Summer squash	EMRL2008-02 (9 July 2008)
Imidacloprid	3.0	Sweet cherries	Canada Gazette II Prior to 16 June 2008



Numbers of Pesticide MRLs in Canada

Number of established MRLs as of June 2008	2480
Number of new MRLs established since July 2008	3247
Total number of Pesticide MRLs in Canada as of March 2007	5640

- 303 proposed MRLs published for WTO consultation
- 943 MRL proposals pending publication



Phased-in approach for reducing reliance on the 0.1 ppm GMRL

- New approach allows for more considered analysis, prioritization, consultation, and planning
- Setting specific, science-based MRLs for all new chemicals/new needs will reduce uncertainties
- Establishing MRLs for Canadian registered uses currently relying on the GMRL based on modern US tolerances that are less than or equal to the current 0.1 ppm are being considered
- Plan to reassess older MRLs through existing programs, taking advantage of modern scientific data and international regulatory cooperation.



U.S.-Canada Grower Priority Database

- Captures grower identified priorities for:
 - Potential Trade Barriers / Irritants
 - Situations where an active ingredient or use site is registered in one country and not the other (tech gap)
 - Situations where the two countries have different MRLs (or no MRL) for the same use site
- Will be considered by PMRA in regulatory programs
 - choosing candidates for grower requested priority reviews.
 - look at differences during re-evaluation
 - Encourage the addition of uses to the label for new submissions



Canadian priorities currently being validated

- **Berry Crops** (incl. cranberry, grapes, sea buckthorn, Saskatoons)
- **Tree Fruits** (pome and stone fruit)
- **Vegetables**
- **Potato**
- **Cereal Crops** (wheat, barley, oats, corn)
- **Oilseeds** (canola, flax, safflower, sunflower)
- **Pulse and Specialty Crops**
- **Herbs and Spices**
- **Ornamentals** (indoor and outdoor)
- **Honey Bees**
- **Mushroom**
- **Forage and Feed Crops**
- **Greenhouse Food Crops**
- **Organic Crops**
- **Soybean**
- **Hemp**



Next Steps for Database

- Modification to US database to be made:
 - Canadian and U.S. designation added
 - Fields for pest and regulatory status added
- Canadian information will be uploaded to the online database which already contains U.S. data
- Health Canada will:
 - Consider the priorities in existing regulatory programs
 - Work with the EPA to explore how best to use the database in joint work.



In Closing ..

- Health Canada is continually improving our regulatory system, taking into consideration modern scientific advancements.
- In reducing reliance on the GMRL, international regulatory cooperation will be key to establishing the significant numbers of science-based MRLs needed while maintaining high Canadian standards for food safety.
- Canadian agricultural producers and food importers must be involved in the setting of priorities over the next few years and be provided with adequate warning of any proposed regulatory change.

