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MRL's - What They Are and Why Do They Matter 2012

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MRLs – what are they and why do they matter

MRL vs Tolerance

- When pesticides registered by US EPA – tolerance is established
  - Amount of residue that is ok on harvested crop
  - If you obey the label, you should not have a problem meeting this
  - Research to determine the labeling to meet tolerance done through IR-4
- MRL – "maximum residue level" is the same as tolerance but in foreign countries

Harmonization (or not)

- Problems may come when the MRL for a potential foreign market is less than the US EPA tolerance
- Not always a problem if the use pattern gives residues that meet the MRL
- BUT in some cases the MRL is so much lower (or virtually zero) that you can't meet it with the current use pattern

What's being done

- CMC subcommittee
  - Identifies important compounds from a list of those that are not harmonized
- CMC contractor
  - works on the political negotiations to achieve harmonization

Impact on growers

- Handler bans certain uses
  - Example – Quinstar no use for EU fruit
    - EU MRL is 0.05 ppm (under consideration); US is 15 ppm
  - Example – Assail – OS says no use on export fruit
    - US MRL is 0.6 ppm; Codex and Australia have no MRL approved (in the works); EU and Taiwan MRL is 0.01 ppm
    - Example of a newer compound where the MRL work comes after the EPA registration – IR-4 in 2012

Date restrictions

- No use after a certain date
- Based on reducing residue to meet MRLs that are lower than US
  - Example – Lorsban US tolerance is 1 ppm; EU is 0.05 ppm

New compounds

- Generally cannot begin MRL petition work until EPA approves US label
- Problem for new registrations in international trade
- Trying to work in tandem for most promising ones

Important older compounds

- Bravo
  - US tolerance is 5 ppm
  - EU and Canada MRL – 2 ppm
  - Solution?
    - Use pattern
    - 2012 IR-4 project; also for CODEX re-registration

Important older compounds

- Sevin
  - US tolerance is 3 ppm
  - EU MRL – 0.05 ppm
  - Solution?
    - 2012 IR-4 project to get new EU MRL
- CA Prop 65 too!
  - Sevin on the list since Feb. 2010
  - No “safe harbor” level