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