

Q. Documentation Requirements on Agricultural Chemicals for Exported Product

NOTE:

NOTE: The Appendices were originally developed for Canadian operations, and provide examples only, based on Canadian and international resources. If your operation is outside of Canada, the following information may be relevant to you. It is recommended that you check whether country-specific requirements or guidance are available instead.

If a product is being shipped to another country, it must be ensured that any agricultural chemicals used are registered in the destination country and that they do not exceed the Maximum Residue Levels (MRLs) in that country.

Using a product where the MRL in the receiving country is lower than Canada's MRL for the specified use, or that is registered in Canada but not in the destination country, can lead to trade problems. This rarely occurs with the United States because most MRLs are harmonized or higher in the United States (US). Problems more often occur with countries in Europe or Asia (e.g. Japan).

There are several common ways to show the requirements have been met in the destination country and to obtain appropriate documentation to help decide which chemicals to use and what the MRLs are in various countries.

1. *Documentation from the customer.* Many customers will supply documentation with specific lists of prohibited agricultural chemicals or lists of selected chemicals that can be used. If the customer wants residue testing done, they will also provide a specific request along with which chemicals residues they want tested. This documentation should be kept on file and presented during an audit.
2. *Maximum Residue Levels.* It is up to the exporter to know the MRLs in the receiving country for the agricultural chemicals they are using. MRL lists for various agricultural chemicals, products and countries may be obtained online and/or from the manufacturer. Once the MRLs in the destination country are known, they must then be compared to the MRLs in Canada for the active ingredients that are being used. If the MRLs are the **same** or **higher** in the destination country, then the agricultural chemical can be used according to the Canadian label directions and will still meet the MRL in the destination country. If the MRL in the destination country is **lower** than in Canada, then the person responsible can either choose not to use that chemical or try and find appropriate label directions and application information so they can meet the MRL.

Here is a list of MRL databases:

- a. International MRL Database (but a paid subscription is required to access the site): <http://www.globalmrl.com>
- b. United States Environmental Protection Agency. Grower Priority Database: <https://www.epa.gov/pesticide-registration/grower-priority-database>
- c. The default standard for most countries is the Codex system <http://www.fao.org/fao-who-codexalimentarius/codex-texts/dbs/pestres/en/>
- d. Database on harmonized MRLs in the European Union: <http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=homepage&language=EN>
- e. United Kingdom MRL database (but a paid subscription is required to access the site): <https://secure.fera.defra.gov.uk/liaison/>

- f. Japanese MRL
database: <http://www.m5.ws001.squarestart.ne.jp/foundation/search.html>
- g. Australian MRL
database: <http://www.comlaw.gov.au/Series/F2012L02501/Compilations>

International pesticide and MRL database Homologa™ is available with information pertaining to international pesticide registrations and residue limits. This comprehensive resource gathers data concerning crop protection products (registration restrictions, approved methods of application, etc.) and current Maximum Residue Limits (MRLs) for 60 countries. Go to <https://v5.homologa.com/en> for more information and to request an account.

3. *Product labels:* Product labels in destination countries can be difficult to obtain. Some may be available from the chemical companies who manufacture the agricultural chemical such as Bayer Crop Science or Syngenta. Information on obtaining and interpreting foreign label information can be obtained by calling a customer service representative for the agricultural chemical manufacturer (e.g. Bayer Crop Science). However, since the formulations may differ across countries, the information on the foreign label may not be applicable to a product purchased and manufactured in Canada. For this reason, many agricultural chemical specialists will recommend **not** using agricultural chemicals if the MRL in the destination country is lower than in Canada.
4. *Residue Testing:* Residue testing is not required unless the customer demands it. If your customer requires residue testing, testing must be completed at least annually, unless required more frequently, by a laboratory that is accredited to ISO 17025. Call the laboratory to find out if the lab has the proper accreditation and ask them to send you proof of accreditation, either a letter or a copy of the accreditation certificate. Both the Standards Council of Canada (SCC) and The Canadian Association of Laboratory Accreditation (CALA) can perform ISO 17025 accreditation.

Residue testing can be done by the individual, by a group (e.g. an operation testing samples for a group of individuals) or the buyer if the buyer is willing to share the test results as well and information on the accreditation of the laboratory. If the group is responsible for testing, the group can take composite samples from several individuals (e.g. taking a sample from a mixed lot or if 10 tomatoes are needed taking a few from each bin). It is important to record which individuals are included in each sample. Also, units (e.g. each apple) and individuals should be chosen randomly for each sample.

Laboratories are able to conduct multi-residue screens where they screen for a single agricultural chemical or up to 300 chemicals in one test. The amount or size of each sample to be taken will depend on the product and the desired tests. Most tests require approximately one kilogram of product taken randomly. For example, this might mean 10 apples taken from various parts of a bulk bin or a packing line. More information can be obtained by calling the laboratory to discuss which specific tests are required, appropriate ways to collect a sample and the amount of product required for each sample.

If test results indicate that the MRLs exceed what is allowed, then retesting must be done from all the individuals in the original sample and, if possible, each tested individually. If product exceeding the MRL has been shipped then the person responsible initiates the recall process and takes corrective actions according to Section 23 Deviations and Crisis Management.