

# THE GPC TAKES ON THE PROBLEMS WITH MRLS

INCONSISTENT STANDARDS, ZERO TOLERANCES AND WIDESPREAD MISCONCEPTIONS: THE GPC'S MRL COMMITTEE HAS ITS HANDS FULL.

A few years ago, Belgium-based Casibbeans conducted a routine test on a cargo of a pulse product destined for Europe and found pesticide residues in excess of the EU's maximum residue level (MRL). The finding left a supplier with containers that had to be re-routed and an expectant customer empty handed. But its repercussions went far beyond these immediate consequences; the experience set Casibbeans' General Manager Caroline Suy on a mission.

Digging deeper into the matter, Caroline discovered that the problem was widespread at that particular origin.

"Luckily," she recalls, "we caught the problem before the goods were imported into the EU." Had the pesticide residues been detected in Europe, the reputation of the country of origin as a whole would have been affected. Case in point: Nigeria. In 2015, the EU banned the import of cowpeas from that country after a shipment was found to have traces of pesticide residue in excess of the EU's MRL.

In the case of the Casibbeans incident, Caroline notified the Global Pulse Confederation of what she learned, which led the GPC to convene a task force, bringing stakeholders from the country of origin together with European importers. The task force made contact with the government of the country of origin, and corrective measures are presently being taken.

"Thanks to the GPC, the issue is being addressed in a concerted way on behalf of the entire industry," says Caroline.

But the GPC didn't let things end there. Recognizing the task force's effectiveness and Caroline's commitment to the issue, it established a permanent MRL Committee and invited her to chair it.

## Understanding MRLs

This had been Caroline's first experience with MRLs and it convinced her that the industry should be addressing the issues surrounding them in a more proactive way. The first step, the committee realized, was to raise awareness.

"Most people don't consider MRLs until there is a problem," notes GPC Executive Director Randy Duckworth.

MRLs are often thought of as food safety measure, but as Mac Ross of Pulse Canada (and an MRL Committee member) explains, "MRLs are just a measure to ensure that pesticides have been used properly. They are neither a safety limit nor a benchmark for human health."

What MRLs represent is the highest level of residue that should be present when a crop protection product is applied according to label instructions. Crop protection products are widely used in agriculture. In pulse production, their use is vital to meeting the industry's global food security and sustainable farming goals. Not only does it result in higher yields, but it also minimizes the need for tillage, thus reducing farming's greenhouse gas footprint.

At the international level, MRLs are set by Codex Alimentarius, part of the UN's Food and Agriculture Commission. But MRLs are also set by regional bodies, such as in the EU, as well as a number of national bodies, including Health Canada and the U.S. Environmental Protection Agency.

"This mish-mash of different MRLs has made compliance increasingly challenging and is why the GPC needs to lead on this issue," says GPC President Huseyin Arslan.

## The Problem with MRLs

Setting MRLs for every possible crop-agrochemical pairing is a monumental task. Add to that the fact that international market priorities are constantly shifting and new crop protection products are continually coming out, and it is perhaps not surprising that the listings maintained by Codex Alimentarius are several years out of date.

"In more jurisdictions we are seeing a movement toward national standards and away from the international standard of Codex," says Mac. "This can cause trade challenges as often when a particular jurisdiction implements a national MRL list, it will be missing an MRL for a crop-crop protection product combination that we use in pulse producing nations."

When MRLs are missing, regulatory bodies sometimes default to zero or near-zero MRLs. That is especially a problem given that in pulse producing nations like Canada, the list of approved uses for crop protection products in pulses is expanding, making it more likely that an importing nation will not have a corresponding MRL.

When markets default to zero tolerances, it cuts off trade. Randy points out that even if pulse growers forego the use of an agrochemical product, there is still the risk of incidental contact, for instance, from contamination from another product that was previously shipped in a container or stored in the same warehouse.

Then there is the reality that more and more countries are now testing pulse imports for residues, coupled with the growing availability of inexpensive and sensitive equipment.

"There is lab equipment that can identify hundreds of active ingredients at levels below one part per billion," says Mac. "That is equivalent to three seconds in a century."

Such miniscule amounts are often hard for people to comprehend, says Randy. "It could be less than one part per billion, but what consumers think is that there are chemicals in their food. This is an area where we need to continue to educate governments and consumers about the safety of our products." The consumer reaction is often exploited by some advocacy groups that seek to ban agrochemicals.

“MRLs are always going down,” says Caroline. “They hardly ever go up. That is in response to consumer pressure. But farmers will tell you, how can they protect their crops? Take the case of weevils. You have to spray for them, but if you don’t spray, are consumers going to accept weevils in their beans?” The combination of regulatory gaps combined with more frequent and sensitive testing can cause shipments of safe and nutritious pulses to be treated as a food safety breach and rejected without warning. This has a detrimental effect on the supply chain and disadvantages growers, traders and consumers of pulse crops.

## Tackling the Issues

As the world’s top pulse exporter, Canada has been at the forefront of developing strategies to mitigate and prevent MRL-related trade risks. As a short-term measure, Canada has created the Keep It Clean Initiative, a collaboration between Pulse Canada, the Canola Council of Canada and Cereals Canada, that communicates best management practices to growers and creates awareness of the effect that on-farm management decisions can have on the marketability of a crop. In the medium-term, Pulse Canada works with crop protection product registrants to provide data to relevant regulatory bodies to establish MRLs in the markets where they are missing. As for long-term strategies, that’s where the GPC comes in.

As part of the Coalition for an Enhanced Codex, the GPC is pushing for the establishment of a harmonized, science-based global standard for MRLs.

“It is important for us to work together with others outside our industry, such as GAFTA, the Canadian Canola Growers, and others who want to see Codex Alimentarius reformed and equipped with the tools it needs to update standards,” explains President Arslan.

Additionally, to combat the default-to-zero tendency, the GPC is encouraging its members to advocate for MRL standards in their respective countries that allow for predictable and open trade while protecting human health and the environment. If the implementation of national MRL list is incomplete (some MRLs for crop protection products used on pulses have not been established) countries should be encouraged to implement an interim MRL that allows trade to continue unimpeded while still protecting human health and the environment.

And of course there is the GPC’s MRL Committee, where GPC members can find recourse.

“If a member has something come up, they should contact the committee,” says Caroline. “That way, we can deal with it on behalf of the industry. Because as an industry, we have more power and can exert more pressure than we can as individual companies.”