



# *Challenges with MRL system – impact on Africa*

*MRL Initiative Workshop – Africa*

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# ***PRESENTATION OUTLINE***

- ***SECTION 1: Background information on trade perspectives – Africa (+ACP)***
- ***SECTION 2: The HORTICAP-Crop Life international Initiative***
- ***SECTION 3: Some challenges in trade***
- ***Way forward***



## *Section 1:*

# *Background information on trade perspectives – Africa (+ACP)*



# 1. Background information on trade perspectives

Traded commodities:

## **FRUITS**

Bananas  
Mangoes  
Papayas  
Grapes  
Melons  
Coconuts  
Pineapples  
Avocados

## **VEGETABLES**

Green beans  
Mangetout/peas  
Tomatoes (cherry)  
Alliums  
Cucumbers  
Cabbage  
Carrots and turnips  
Asparagus





## *Section 2:* Some challenges in trade – experiences from Kenya



## 2. Some challenges in trade – experiences from Kenya

- Vast types of “tropical” products, limited MRLs for these products (if any).
  - Pesticide use on specific commodity doesn't provide incentive for agrochemical manufacturers.
  - Limitations in the crop grouping to include “tropical” products making extrapolation difficult.
- Specific pest/crop combinations may be defined as “minor use” (since unique to “tropical” conditions)
- Where they exist, MRLs differ in different countries
- Terms used differ





# *Section 3:* Some consequences



### 3. Some consequences

- Barriers to trade:
  - Interceptions/rejections of traded commodities due to use of “unauthorised” pesticides on products
  - Lack of data results in MRLs set at the LOD (limit of detection)
  - Notification due to MRL exceedance (exceedance in AfRD)
  - Limitation to market access – may result in ban



## 4. Mitigation

- Bilateral/multilateral negotiations
  - Time consuming
  - Application for import tolerance (if possible)
  - Costly – usually varies from country to country (or trading block to trading block)
  - Support from agrochemical industry required



## 4. Mitigation (contd...)

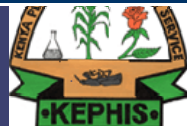
- Some outcomes – (COLEACP PIP)
  - On French beans 11 Import Tolerance (MRL) for EU market (requested through the PIP).
  - On Passion fruit, 6 Import Tolerance requested for EU (requested through the PIP).



# Summary of some PIP data

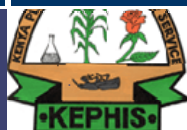
Active substance	BEANS WITH PODS (mg/kg)		PASSIFLORA EDULIS (mg/kg)	
	Residue observed	IT requested/ Granted (previous MRL)	Residue observed	IT requested/ Granted (previous MRL)
Abamectin	0.020	0.05 (0.01)	-	-
Chlorothalonil	2.600	5 (0.01)	-	-
Cyromazine	1.300	5 (0.05)	-	-
Difenconazole	0.210	1.0 (0.05)	-	-
Myclobutanil	0.180	0.3 (0.02)	-	-
Azoxystrobin	-	-	2.140	5 (None)
Spinosad	0.180	0.5 (0.01)	0.326	1.0 (None)
Spiromesifen	-	-	0.339	1.0 (None)
Tebuconazole	0.080	2 (0.02)	0.588	2.0 (None)
Thiamethoxam	-	-	0.104	1.0 (0.05)
Trifloxystrobin	0.360	0.5(0.05)	0.716	3.0 (None)

Bracketed data relates to previous EU MRL



# Summary of some PIP data (*contd.*)

Active substance	Okra (mg/kg)		Papaya (mg/kg)	
	Residue observed	IT requested/ Granted (previous MRL)	Residue observed	IT requested/ Granted (previous MRL)
Azoxystrobin	0.48	2.0 (0.05)	0.072	0.2 (0.05)
Bifenthrin	0.110	0.2 (0.05)	0.300	0.5 (0.05)
Lambda cyhalothrin	0.070	0.1 (0.05)	-	-
Mancozeb	0.130	0.5 (0.05)	(Maneb)3.290	5.0 (0.05)
Thiophanate methyl	0.870	1.0 (0.1)	0.16	1.0 (0.10)
Spinosad	0.180	0.5 (0.01)	-	-
Spiromesifen	-	-	0.240	1.0 (0.02)
Tebuconazole	0.080	2 (0.02)	1.200	2.0 (0.05)
Thiamethoxam	-	-	-	-
Trifloxystrobin	0.360	0.5 (0.05)	0.483	1.0 (0.05)



# Shortcomings of PIP data

- Not all commodities in Codex classification system of Food and animal feeds
- Some pesticides not registered in country where trials were conducted (no GAP available)
- Data insufficient for Codex MRL
- Challenge in support for label extensions





**THANK YOU**

