Challenges with MRL system – impact on Africa

MRL Initiative Workshop – Africa

30th March to 2nd April 2009,

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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

<table>
<thead>
<tr>
<th>Active substance</th>
<th>BEANS WITH PODS (mg/kg)</th>
<th>PASSIFLORA EDULIS (mg/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Residue observed</td>
<td>IT requested/ Granted (previous MRL)</td>
</tr>
<tr>
<td>Abamectin</td>
<td>0.020</td>
<td>0.05 (0.01)</td>
</tr>
<tr>
<td>Chlorothalonil</td>
<td>2.600</td>
<td>5 (0.01)</td>
</tr>
<tr>
<td>Cyromazine</td>
<td>1.300</td>
<td>5 (0.05)</td>
</tr>
<tr>
<td>Difenconazole</td>
<td>0.210</td>
<td>1.0 (0.05)</td>
</tr>
<tr>
<td>Myclobutanil</td>
<td>0.180</td>
<td>0.3 (0.02)</td>
</tr>
<tr>
<td>Azoystrobin</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Spinosad</td>
<td>0.180</td>
<td>0.5 (0.01)</td>
</tr>
<tr>
<td>Spiromesifen</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Tebuconazole</td>
<td>0.080</td>
<td>2 (0.02)</td>
</tr>
<tr>
<td>Thiamethoxam</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Trifloxystrobin</td>
<td>0.360</td>
<td>0.5(0.05)</td>
</tr>
</tbody>
</table>

Bracketed data relates to previous EU MRL

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

<table>
<thead>
<tr>
<th>Active substance</th>
<th>Okra (mg/kg)</th>
<th>Papaya (mg/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Residue observed</td>
<td>IT requested/Granted (previous MRL)</td>
</tr>
<tr>
<td><strong>Azoxystrobin</strong></td>
<td>0.48</td>
<td>2.0 (0.05)</td>
</tr>
<tr>
<td><strong>Bifenthrin</strong></td>
<td>0.110</td>
<td>0.2 (0.05)</td>
</tr>
<tr>
<td><strong>Lambda cyhalothrin</strong></td>
<td>0.070</td>
<td>0.1 (0.05)</td>
</tr>
<tr>
<td><strong>Mancozeb</strong></td>
<td>0.130</td>
<td>0.5 (0.05)</td>
</tr>
<tr>
<td><strong>Thiophanate methyl</strong></td>
<td>0.870</td>
<td>1.0 (0.1)</td>
</tr>
<tr>
<td><strong>Spinosad</strong></td>
<td>0.180</td>
<td>0.5 (0.01)</td>
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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