



**IGTC Policy
on Trade Implications of Maximum Residue Limit Setting
June 2017¹**

The IGTC's overarching objective is to achieve a market and regulatory environment supportive of trade that avoids disruptions in the international trade of grain, oilseeds, pulses and derived products.

Global disorganization in the establishment and enforcement of Maximum Residue Limits (MRLs) to manage crop protection products in the agri-food value chain is impacting the global grain and oilseed sectors with increasing intensity. Zero or near-zero default tolerances, the application of different levels of MRLs in exporting and importing countries, or missing MRLs resulting from misaligned policies impede trade, food security and innovation.

As global trade increases, the importance of standard-setting bodies focused on science and risk based approaches, for example the work of Codex Alimentarius (Codex), also increases. Enabling this to work more effectively has a direct impact on trade facilitation, on the safety and quality of the international food trade, and ultimately, promotes trust among importers, exporters and consumers of products.

IGTC Principles Related to Crop Protection Products (CPP):

- Missing and misaligned MRLs create significant uncertainty for the global grain trade. Both government and private sector have a role in developing and implementing trade-enabling solutions.
- Consumers are the priority beneficiaries of improvements in MRL setting, in the implementation of trade-enabling solutions and science-based risk assessments as the basis for regulation.
- Regulatory coherence across exporting and importing countries is key to supporting grain trade for food, feed and processing and needs to result in manageable MRLs.
- Standards, sampling and testing methods as they apply to grain for food, feed and processing must be practical, coherent and provide for least trade distortive measures.
- Governments must have in place clear, predictable and consistent rules to facilitate trade. Legal certainty of rules needs to be provided on crop protection product residue management, and MRL setting in particular.
- Transparency must include risk management conventions, rules around MRL setting, and information on existing and proposed MRLs for grain for food, feed and processing. Transparency needs to occur via communication, information sharing and awareness on issues related to grain for food, feed and processing between exporting and importing countries.

¹ This policy was approved by IGTC Management Council on June 6, 2017.



IGTC

International Grain Trade Coalition

IGTC Policy on Trade Enabling Solutions for MRL Related Matters

- IGTC supports aligned and robust international standards based on sound science and risk assessments to facilitate trade and improve food security. MRLs encourage correct application of crop protection products and indicate the highest level of a product residue legally tolerated.
- IGTC supports all WTO Member countries' use of existing international MRL standards to reduce the occurrence of MRL-related matters becoming barriers to trade "without requiring Members to change their appropriate level of protection of human, animal or plant life or health"².
- In cases where an MRL or import tolerance has not been formally established for the commodity in question in an importing country, IGTC requests all countries to use available Codex MRLs as an automatic, interim measure until the country in question completes its evaluation process and formally establishes an MRL.
- In cases where no MRL or import tolerance has been established by the importing country or Codex, IGTC requests all countries to adopt MRLs as applied in exporting countries as an interim measure until an MRL is formally established by the country in question or by Codex.
- IGTC shall lead work to increase the use of international standards, to harmonize MRL standard setting policies and to encourage capacity improvements at Codex, as well as multilateral and bilateral MRL initiatives. In particular, IGTC shall explore the development of binding agreement(s) on grains, oilseeds and other agri-bulks, including importing and exporting countries, on a harmonized approach to MRL setting among the parties, such as agreement on workable elements of a policy on mutual recognition of MRLs or MRL equivalence. IGTC refers to mutual recognition of MRLs as recognition of scientific standards (RSS).

IGTC Support for Enhancing Codex MRL Development

IGTC supports enhancing Codex MRL establishment by addressing:

- Human resource constraints, given the challenges in securing an adequate number of suitable experts to work to support of the work of the FAO/WHO Joint Meeting on Pesticide Residues (JMPPR).
- Financial resource constraints, as both FAO and WHO are limited in financial resources that they make available to JMPPR due to competing demands on their budgets. IGTC is encouraged by the establishment of the open ended working group to examine financing aspects.
- Methodology improvements and changes in the review processes which could help accelerate the establishment and review of MRLs and increase global harmonization.
- Unnecessary time delays to adoption of a Codex MRL where prior assessments by member countries (e.g., global joint reviews) could form the basis of a Codex assessment thereby shortening the timeframe to approval.

² Ref: The WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) ([link here](#))