Setting Import Pesticide MRLs as a mean to prevent trade disruption of agricultural products

10 December 2025

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Background

Setting the Stage

- Pesticide Residue Levels are an important area of food regulatory decisions.
- Important contribution to trade impediments due to:
  - Different MRLs applied or the lack thereof (No MRL was established – Pesticide not registered in all countries)
  - Different opinions in laboratory results.
- Codex sets clear guidelines related to establishing pesticide MRLs:
  - Reliance on scientific assessment by JMPR.
  - Accounts for HBGVs: ARfD and ADI.
  - Accounts for results related to patterns of use, fate of residues, analytical methods, etc.
  - Estimation of both short term (acute) and longer term (chronic) exposure.
  - Periodic Reviews.

الهيئة القومية لسلامة الغذاء
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What Happens when Residues are Detected in a Country where the Pesticide is Not Registered (No MRLs) AND / OR No Codex MRLs / No Guidance / Food Security?

Definition

The term ***import MRL or tolerance*** refers to a maximum residue limit (MRL) established for imported food commodities in situations where the pesticide is not registered for domestic use, set in a manner to meet the national food safety requirements.

Proposed Decision Tree

Residue Level Not Compliant
National MRL or No Codex MRL

Is the Level found In Compliance with the Export Country Requirement?

NO

YES

REJECT PRODUCT
Full Non-Compliance

No

Has the MRL been set according to acceptable Practices : Transparency, Risk Analysis Based

YES

REJECT PRODUCT
Full Non-Compliance

No

CONDUCT RAPID RISK ASSESSMENT
Based on national Consumption Patterns to confirm suitability: Suitable ?

YES

ACCEPT MRL
Of Export Country and Shipment

Collection of MRLs accepted in this fashion or through systematic review of MRLs from Export countries could make up a Positive list – Beyond Pesticide Registration aspects

Proposed Risk Management Approach

- Although the product was **non-compliant** with the existing MRL, the **health risk is negligible**. Given food security and supply chain considerations, the following approach is proposed:

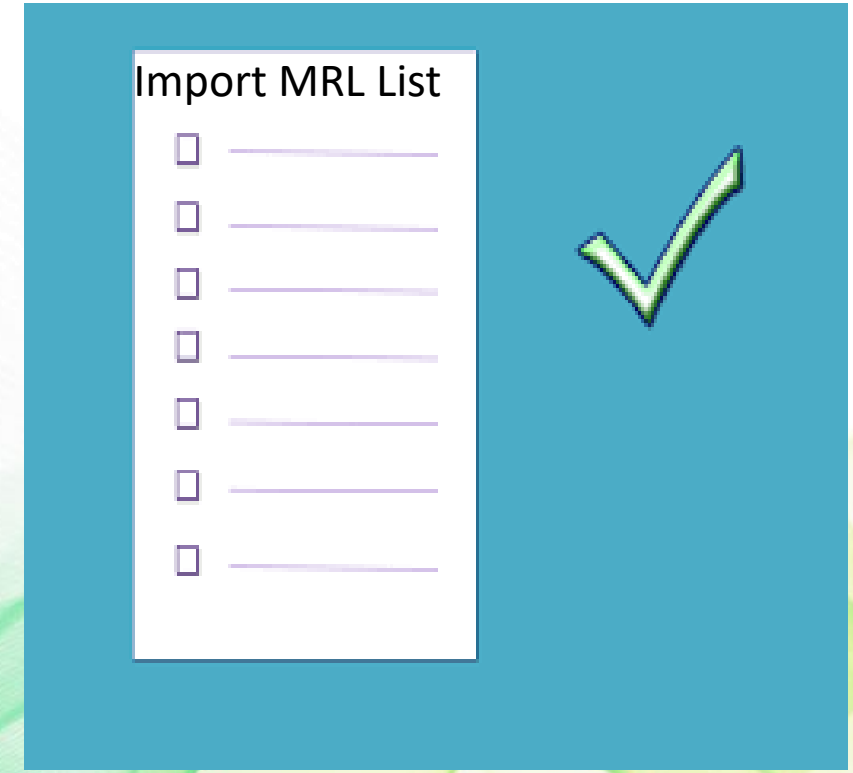
1. One-time authorization of the detained consignment due to negligible health risk.

2. Recommendation to review MRLs for the imported product to consider alignment with international standards.

3. Development of a structured framework for evaluating and adopting **import MRLs** when justified by:

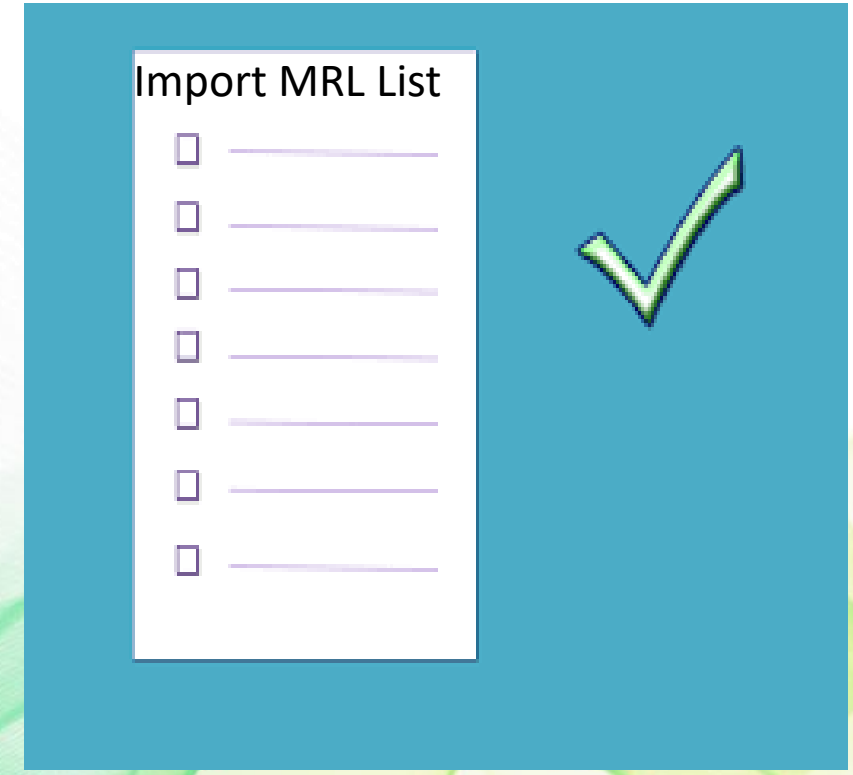
- Scientific risk assessment, and
- Internationally recognized Good Agricultural Practices (GAP).

- This framework would support both food safety and trade facilitation while maintaining consumer protection.



Possibility of Creating Import MRL List

- Based on situations encountered and assessed, through history of compliance, and/or
- Through systematic review of practices from trading partners, clearly distinguishing pesticide registration from import MRL requirements, and/or
- Putting the obligation on industry to seek acceptance of import MRL based on their practices with the justification provided according to the requirements of the decision tree.



Conclusion: Import MRLs Approach

- This Approach illustrates that **regulatory non-compliance does not always equate to a health risk**, emphasizing the need for **science-based MRL setting** and **import tolerance mechanisms**.

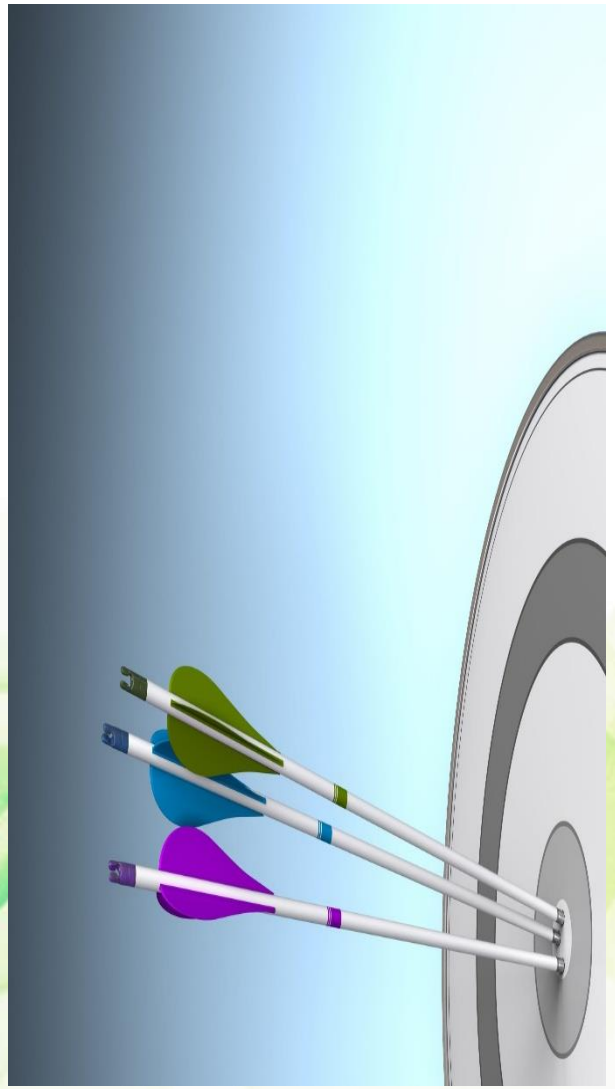
- A data-driven framework for risk assessment and management ensures both **consumer safety** and **food system resilience**.

Call for Regional Cooperation & Data-Sharing

- **Such an approach would be implemented when science-driven data are available**, including:
  - Consumption data
  - Exposure data
  - Analysis Record databases

- It is important to note that **our region shares many common characteristics in consumption patterns, production systems, and lifestyle behaviors**, which further supports the applicability of this approach.

Let's Boost our Food systems to more Consumer & Trade Friendly systems



Points for Further Discussion:

1. How many Jurisdictions have embarked on the development of Import MRLs Approach?
2. How can we develop this approach for Africa?
3. Can this Approach be implemented on a Regional/Sub-regional Level such as RECs e.g.(COMESA, ECOWAS, SADC, EAC)?


thank you
merci
danke
謝謝
gracias
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bedankt
go raibh maith agat
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