North American Perspective Facilitating Trade Through Cooperation

James R. Cranney California Citrus Quality Council

Major Points for Discussion

- Role of CCQC
- The importance of trade for minor crops
- Problems
- Suggestions for facilitating trade



California Citrus Quality Council

- Solve regulatory problems domestically and internationally
- Core mission is to facilitate trade
 - Maximum Residue Levels (MRLs)
 - Phytosanitary issues regarding insects and plant diseases
- Provide crop protection tools for growers

Exports are Economically Important



Top Orange Export Markets



Top Lemon Export Markets (Thousand U.S. Dollars)



Exporting 101

- Export markets demand perfect maturity, blemish-free fruit, large sizes & uniform color
 This is the "cream" of the crop
- It may take select production from several groves to fill export orders
- Difficult to designate specific groves for specific export markets
- Production can go anywhere
- Pesticide residues should be "legal" anywhere; including post harvest fungicides used in packing houses

Production and Trade Interface Issues

- Need many pesticide options (resistance)
- Difficult to manage acreage for specific markets
- Delayed use until MRLs are established
- Emergence of secondary standards (restricted pesticides and lower residue levels)

- Are there MRLs?
- Are there MRLs?
- Can we avoid delays?
- Counterproductive

Harmonization Challenges

- Important trading partners are moving away from a single global standard, creating a proliferation of many different standards
- Japan
- Taiwan
- Korea
- Hong Kong
- China
- European Union (?)

How can we manage in this environment?

- Different MRLs
- Number of trials
- Crop groups
- Process
- Cost

Adopt APEC MRL Guidelines



- Consistency in process and data requirements
- Saves resources
- Predictable
- More harmonized
 MRLs

Communication and Flexibility

- Provide avenues and opportunity to discuss problems
- Maintain flexible process to address problems
- Korea Ministry of Food and Drug Safety
 - Flexibility in implementation
 - Added crop groups
 - Allow Codex data for generic pesticides
 - Open communication and dialogue

Can countries incorporate Codex in new MRL setting systems?

Use Codex standards as temporary standards to fill gaps

Summary

- Many countries are adopting proprietary MRL setting systems
- Increasing cost and complexity in establishing MRLs
- Many different MRL standards and delays for growers
- Use APEC guidelines
- Provide flexibility in adopting proprietary systems
- Incorporate Codex standards



MCFA

Minor Crop Farmer Alliance

James R. Cranney, Jr. California Citrus Quality Council 853 Lincoln Way, Suite 206 Auburn, CA 95603 Tel: (530) 885-1894 Fax: (530) 885-1546 Mobile: (530) 906-6546 icranney@CCQC.org

MCFA Secretary Chairman, MCFA International Subcommittee



The voice of Canadian fruit and vegetable growers

Minor use pesticides – a view from the Canadian horticulture sector

Rebecca Lee, PhD Executive Director Canadian Horticultural Council October, 2017



Contents

- Overview of CHC
- Benefits and the use of dedicated minor use/assistance programs
- Managing emerging pest issues
- Export/trade and chemical review issues
- Degree of engagement with dedicated minor use programs and legislators to support outcomes for minor use
- Factors that could facilitate grower outcomes and support into the future

Overview of CHC

Who we are

- National non-profit advocacy group
- Based in Ottawa
- Governed by a Board of Directors
- 10 staff
- We are the voice of Canadian fruit and vegetable growers

Who we represent

- Over 22,000 growers
- Over 130 member organizations
- Over 120 different commodities
- Members are in Canada and beyond

What we do

- Advocate for members on key issues
- Facilitate government consultations
- Coordinate research projects and funding

How we are organised...

Core areas

- Labour
- Trade and marketing
- Industry standards and food safety
- Finance and business management
- Crop, plant protection and the environment

Commodity groups

- Apple & tree fruit
- Potato
- Greenhouse vegetables
- Berries
- Field vegetables

Benefits and the use of dedicated minor use/assistance programs

AAFC's Pest Management Centre (PMC) and Pesticide Reduced Risk Program (PRRP) impact on minor use (MU) crops in Canada has been very positive.

- From: few pesticides registered + many emergency registrations / year
- To: growers now have registered pesticides for most of our priority pests and diseases + the need for emergency registrations is greatly reduced.

Benefits and the use of dedicated minor use/assistance programs (cont.)

- Almost universal dependence on PMC to generate residue and efficacy data for MU food crops and Dislodgeable Foliar Residue (DFR) data for MU non-food crops.
- Benefits of the PMC:
 - Dedicated, reliable funding and staff for on-going MU registrations.
 - Transparency Growers pick projects through provincial MU coordinators grower meetings and/or by attending the Ottawa meeting.
- Concerns:
 - PMC was never intended or budgeted to do DFR work.

Managing emerging pest issues

- AAFC's PMC, provincial ministries of agriculture and grower groups, e.g. CHC, are engaged in research and finding solutions for emerging pest issues such as Spotted Wing Drosophila (SWD) and Brown Marmorated Stink Bug (BMSB).
- PRRP is engaged in work to address priority pests and diseases e.g. Downy Mildew GH Cucumber working group
- Grower associations engaged in finding solutions to new and emerging economic pests, e.g. OGVG and pepper weevil on GH peppers

Managing emerging pest issues: Challenges

- Time between emergence of new pest and registration of control products
 - Government agencies can be slow to respond and growers pay the price
 - Can the regulatory system respond fast enough when a quarantine pest is found? What mechanisms are in place for CFIA and the PMRA to coordinate to address quarantine pest issues?
- Resistance management
 - Registration of products in different FRAC, HRAC and IRAC
- Discontinuing pesticide registrations with no viable or efficacious alternatives in place
 - e.g. imidacloprid can leave large gaps in growers IPM toolboxes
- Discontinuing broad spectrum pesticides resulting in secondary pest becoming serious problem
 - e.g. imidacloprid used to control aphids and whiteflies also controlled *Lygus* and stink bugs.

Export/trade and chemical review: Challenges

- Harmonization with our major trading partner
 - The many joint Canada-US (PMC-IR4) minor use projects are helping to address this issue.
 - Next step: Global MU projects. Same time registrations and same MRLs in OECD countries will help Canadian farmers who are seeking new export markets.
- Resources needed by CFIA to address phytosanitary barriers to trade
 - Bilateral agreements needed for Canadian farmers to gain access to new markets & to resolve barriers in existing markets
- Harmonization with the EPA
 - PMRA working on DFR database for greenhouse food and non-food crops, when DFR data could be used interchangeably. Burgeoning problem with re-evaluations, too.
 - Lack of harmonization = different registration decisions between CAN/US
- Risk based assessments vs. hazard based assessments
 - Will Canada move to hazard based assessments like Europe?
 - Could lose many important pesticides what will replace them?
 - Will we go back to a situation where many EUR will be needed every year?

Degree of engagement with dedicated minor use programs and legislators to support outcomes for minor use

- Growers and grower associations are fully engaged with the PMUCs, PMC's MU workshops.
- CHC CPAC meets at least once yearly with top PMC and PMRA staff to discuss issues of concern to the growers around pesticide registrations.
- CHC and individual grower groups respond to PMRA proposed registration/re-evaluation decision consultations.
- CHC –educating politicians about issues of importance to agriculture Fall Harvest

Factors that could facilitate grower outcomes and support into the future

- Biopesticides
 - Research and extension support for growers
- New invasive pests and diseases
 - Resources to minimize such events from happening
 - Improvement of government agency response times
 - Movement from a risk-based to a hazard-based model
 - Government supports if many pesticide registrations are discontinued/phased out?
 - Transition period to allow alternatives to be put in place or will we go back to a situation where many EURs are submitted every year?

Barriers to accessing crop protection products

- Canadian registrations without export MRLs
 Rovral, Dynomite and Vendex
- Investment too great for registrants
 ≻Cyflufenamif, triflumizole
- PMRA is not the EPA
 - ➢Occupation exposure data (DFR)
 - ► Value and efficacy data





@CHC_CCH





Introduction – Dragonberry Produce








Dragonfruit with quality issues without Difenoconazole



Dragonberry

Reaching Out to All Parties January 2014

Governments

Researcher & Private Sectors

- United States Environmental Protection Agency (EPA)
- United States Department of Agriculture (USDA)
- Vietnam Embassy, WA-DC

• IR-4 Project, Rutgers University

Dragonberr

- Syngenta –USA Office
- Importers from USA
- Exporters from Vietnam



Market Conditions

IMPROVEMNTS

- Dragonfruit qualities has less defects arrival issues
- Less reported cases of dragonfruit citations by law enforcement to order for destruction of fruits.
- Increased volume of dragonfruit importation into the USA

PROBLEMS

- Not all imported dragonfruits meet USA MRL tolerance
- Unfair trading prices of dragonfruits imported into USA and sold at price less than dragonfruits that do meet USA MRL tolerance



KEVIAR 325SC

by Brightonmax International in the Approved Vietnam List of Chemical Notice 34/2015/TT-BNNPTNT

THÀNH PHẦN

Azoxystrobin 200 g/lít Difenoconazole 125 g/lít



AMISTAR TOP

by Syngenta -Vietnam Not approved for use on dragonfruit since Oct. 12, 2015

> Azoxystrobin 200 GL Difenoconazole 125 GL



Grower's Continued Difficulties

Vietnam Regulations

- MRL laws from different countries are not shared with growers
- No supports or educations programs to teach about MRL
- Unclear process of how trade name or chemical compound are registered for use.

Global Regulations

- Risk assessments used by countries do not share the same methods of evaluating the data
- Multiple different MRL requirements for dragonfruit, in different countries that doesn't grow the fruit



Finding Continued Success with help from Global Leader Countries

Global MRL

- All countries sharing their methods of evaluating risk and finding common ground standards
- Harmonization of MRL laws will help prevent lost for growers in all regions

Helping Developing Countries

- Stream lining the MRL registration process will help growers in developing countries with no resources the supports
- Providing education of MRL during trade agreements





Dragonberry PRODUCE

Thank You ! Cảm ơn



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Regional look at growers challenges and engagement enabling current and future opportunities

Luc Peeters | 04.10.2017 Chair of the Copa and Cogeca Working Party on Phytosanitary issues



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Regional look at growers challenges and engagement enabling current and future opportunities



Index

- Introduction
- Current situation of minor uses and specialty crops in the EU
- European legislative framework
- Shortcomings and actions
- Proposals and recommendations
- Conclusion





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Introduction

Introduction (I)

Two organisations....

Copa

Created in 1958, Copa represents 23 million European farmers and family members

Cogeca

Created in 1959, Cogeca represents 22, 000 European agricultural cooperatives

Copa and Cogeca

In 1962, a joint Secretariat was created, making it one of the biggest and most active lobby organisations in Brussels

« The united voice of farmers and their cooperatives in the European Union »



Introduction (II)

Mission

To ensure a viable, innovative and competitive EU agriculture and agri-food sector

Organisation

66 Member organisations and 34 Partner Organisations 25 agricultural sectors covered (many Minor Uses):

- Cotton
- Flax and Hemp
- Flower and plants
- Fruits and vegetables
- Hops

- Rice
- Seeds
- Tobacco
- ..
- And Major crops with Minor Uses





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Current situation of minor uses and specialty crops in the EU

Current situation of minor uses and specialty crops in the EU (I)

Importance of Minor Uses

- Around 85-90% of total crops
- Around 5% of total European Utilised Agricultural Area (UAA)
- Mostly vegetables, fruits, nurseries and flowers: €70 billion EU production value
- 20% of total EU agri-production value
- Specialty crops provide diversity in diet: wide range of variety
- High speciality crops mostly on high specialised farms

Definition of MUSC: crops and pests for which industry does not provide solutions



Current situation of minor uses and specialty crops in the EU (II)

Main challenges

- Magnitude of impact of pest problems similar to major crops
- Economical impact on farm level is very high
- Crop protection solutions not available mainly due to high costs of development
- Resistance build up if no rotation in active substances
- Emergency authorizations are not long term solutions
- Develop new solutions for these quality crops
- Lack of involvement and participation from all EU Member States
- Distortion of competition at EU level



Current situation of minor uses and specialty crops in the EU







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European legislative framework

European legislative framework (I)

Official regulatory framework

- Regulation 1107/2009 concerning the placing of plant protection products on the market
 - New active substances (February 2016)
 - 39 new substances submitted since June 2011
 - 11 active substances have an Approval vote
 - 9 have also an MRL vote
 - 2 have MRL regulations
 - 1 Product authorised



European legislative framework (II)

Zonal system and Mutual recognition



Outcome of re-evaluation by second MS during MR application:

- Authorisation with identical conditions 56%
- Authorisation with different risk mitigation 27%
- Authorisation not possible 6%

Conclusion: Re-evaluation does NOT add value



European legislative framework (III)

- Emergency authorisations



Numbers of emergency authorisations notified at PAFF meetings





European legislative framework (IV)

- Effects on minor uses and specialty crops depend on:
 - how the zonal system works in practice
 - how mutual recognition is applied





European legislative framework (V)

- EU added value
 - Harmonisation (guidelines and interpretation, i.e. CfS, MUSC,...)
 - Risk assessment (EFSA)
 - Single zone for MRL \rightarrow Single market and trade
 - Minor Uses Coordination Facility



WELCOME to the European Union Minor Uses Database EUMUDA !





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Shortcomings and actions

Shortcomings and actions (I)

Shortcomings

- Loss of active substances (EDs)
- Obstacles to mutual recognition within same zones
- Not unique list of minor uses and specialty crops / no definition
- National assessment for alternatives to Candidates for Substitution
- Lack of commitment and not enough funds for Minor Uses (CF)





Shortcomings and actions (II)



- Agri-Food Chain Roundtable (AFCRT)
- Update of Collaboration roadmap with International Biocontrol Manufacturers' Association
- Other collaborations

 Low Yield report, workshops (neonicotinoids...)
- Participation in the EU Minor Uses Coordination Facility
- Participation in the Sustainable Plant Protection Initiative





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Proposals and recommendations

Proposals and recommendations (I)

Regulatory aspects

- Propose a positive definition to Minor Uses and Specialty Crops
- Facilitate registration (including pan-European autorisation for MUSC)
- Provide more incentives for companies to invest:

Possible risk classes	Approval periods
Cut-off	No approval
CfS	$7 \rightarrow 10$ years
Specific risk	$10 \rightarrow 15$ years
Standard	$10-15 \rightarrow 20$ years
Low risk	Unlimited approval period

 Application of Commission Implementing Regulation amending the criteria of low risk substances



Proposals and recommendations (II)

Other initiatives

- More integration/coordination of EU programmes with GMUS
- More European vs national initiatives (MRL, MR, CF, zonal and European authorisations...)
- Long-term funding of the Minor Uses Coordination Facility
- Allocate EU research funds for MUSC
- To develop chemical and non-chemical solutions for MUSC, according to IPM principles
- Bottom-up approach: ensuring Farmers and Agri-Cooperatives' involvement
- Stakeholders participation in the Sustainable Plant Protection Initiative



Proposals and recommendations (III)

Many of the recommendations are shared through the AGF Chain:



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european farmers

MUSC is a MUST >> Need to build a solution

There is a momentum:

- Persistent call of AFCRT and its members on the need for a robust and long lasting solution
- MUSC was recognised through the setting up of the Minor Uses Coordination Facility Secretariat
- Pan-European cooperation based on trust is key to address the issue of MUSC
- Minor Uses Coordination Facility Secretariat = appropriate forum of debate and action
 - Commodity Experts Groups
 - Horizontal Experts Groups
- Role of European Commission , Member States Competent Authorities
- REFIT process of Regulation (EC) N° 1107/2009 = opportunity to review options for either taking benefit of existing provisions or identify new requirements to better address MUSC

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Conclusion

Conclusions (I)

- EU competent authorities are very reluctant in dealing with MUSC
- PPPs industry is very active in "greening programmes", less in MUSC
- Both are hoping that farmers are doing the work and paying the bill (twice)
- Nice work is done in the technical groups where some MS and stakeholders are taking the lead, having big positive results
- More of this cooperation/collaboration is needed
- Implementation of Mutual recognisation in MS should be imposed by EC
- Big pressure on all kind of AI will influence MUSC in the first place
- Growers and PO are doing there part , please join/help us

because



Conclusion (II)





W

The spring thrip (Scirtothrips inermis)
 Impact of spring thrips
 Healthy persimmon

Crop Persimmon (Diospyros kaki) Pest threat Spring thrips (Scirtothrips

inermis)

Region at risk Spain

Crop area at risk 10 000 ha

Potential pest impact The spring thrips attack the persimmon trees mostly during their flowering, altering the

minor use major value

If the EU^{**} fails to provide plant protection solutions for minor use and speciality crops^{***} Is Europe ready to lose a market worth €70 billion/year, representing 22% of the total value of annual EU agricultural output?

- * An awareness raising campaign promoted by the EU Agri-Food Chain Partners (AREFLH, CELCAA, COCERAL, Copa-Cogeca, ECPA, ESA, Freshfel, IBMA, PROFEL and Union Fleurs)
- ** European Commission, Council of the European Union, European Parliament, and Member States
- *** Minor uses concern crops grown on relatively small acreage like fruits, herbs, and vegetables, cereals, including rice, seed crops and small crop seed treatments, hops, flowers and all those plants that need a tailor made plant protection product, whether it is for growing them, storage or transportation





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Thank you for your attention

www.copa-cogeca.eu


A Regional Look at Grower Challenges and Engagement: Enabling Current and Future Opportunities

Tanzania Horticultural Growers Perspective

Kelvin Remen Swai Policy and Advocacy Manager

Tanzania Horticultural Association





- Established in 2004 and became operational in 2005
- Established to promote and develop horticulture and address the general and specific needs of its members.

VISION: "An economically vibrant and sustainably prosperous horticulture industry"

MISSION: "Driving inclusive, transformative, competitive and sustainable horticultural growth in Tanzania"

Coverage: 15 regions including Unguja and Pemba TAHA's four main Strategic Objectives:

- I. Lobbying and Advocacy Govt and donors,
- 2. Technical Support projects, trainings, seminars, shows, etc
- 3. Information dissemination media, researchers, govt, consultants, etc
- 4. Promotion in and outside Tanzania www.taha.or.tz



TAHA Approach and Coordination





Logistics







www.taha.or.tz



Enhanced productivity



CONTRIBUTION OF HORTICULTURE IN TANZANIA

- Main contributor to foreign income earned from agriculture (38%)
- Rapid growth: US\$
 545.5million in 2015 from UD\$ 64million in 2005
- Employs about 2.5million people: 44 Million ha of arable land, only 6% utilized
- Food and Nutrition security
- Youth and women employment





Aggregate production data (MT) 2013/14 – 16/17

No.	Crop	2013/14	2014/15	2015/16	2016/17
1.	Fruits	4,416,690	4,574,240	4,711,000	4,946,550
2.	Vegetables	1,005,305	1,041,375	1,189,000	1,236,560
3.	Flowers	10,790	11,140	11,500	11,615
4	Spices	8,377	8,609	20,400	21,420

-Three quarters of horticultural products is fruits (in terms of volume)

- Increasing number of customers of the products
- Increasing population and
- Awareness: horti as a key component to food and nutrition security

www.taha.or.tz



Ensure access to quality agricultural inputs (availability, accessibility, affordability and proper utilization)

- In 2008, TAHA managed to secure a blanket registration for 300 pesticides for veggies and fruits in Tanzania
- Fertilizer (Amended) Regulations 2017
 - -Reduction of field trial period from three cropping seasons to one.
 - -Reduction of field trial costs from USD 30,000 to USD 10,000
- Registration of Biological Control Agents for veggies and fruits (Currently working on the regulations for registration of microbials).

Our Advocacy work......



- Close working relationship with Government Registration Authorities/Agencies (TPRI, TFRA, TOSCI, NBCP)
- Strong relationship with Agro dealers (Allied members) i.e.
 Syngenta, Yara, Real IPM, Triachem, By trade
 - Technology Testing, dissemination and promotion to farmers

Our Involvement in IR4 Project



- We are part of the research
- Local coordinators on the ground
 - -Funding Management
 - -Trial Farms identification
 - -Agronomic support to the project
- Participating in residue and efficacy trials

Supervised Residue Field Trials of Sulfoxaflur (Closure 240SC) on mangoes

Achievements from IR4 Project



• Anticipated Increase in export/trade potentials as veggies and fruits produced are in line with market requirements (MRLs levels)

Capacity building

- of local research institutions and government regulators in conducting high quality residue field studies, conducting innovate research related to reducing pesticide residues on food crops
- ✓ Residue analysis
- Food and Environmental Safety as a result of proper application of less hazardous pest control products

Harmonization of Pesticide Registration in East Africa



 Three technical groups were constituted to work on three envisaged guidelines

> harmonization of efficacy trials harmonization of residue trials for pesticide registration harmonization of pesticide registration data requirements

- Harmonization of registration procedures will facilitate movement of high quality products and increase farmers' access to quality pesticides
- Abolition of red tape bureaucracies in registration will increase farmers' access to newer and less hazardous pest control products

Our Contacts

Tanzania Horticultural Association P.O. Box 16520 ARUSHA, Tanzania Tel: 255 27 2544568 Fax: 255 27 254 4568 E-mail: info@taha.or.tz

See Us At:

Website: <u>www.taha.or.tz</u>

FB: https://www.facebook.com/TanzaniaHorticulturalAssociationTaha?fref=ts

TAHA PHOTOS: https://www.flickr.com/photos/tahacommunications

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A Regional Look at Grower Challenges and Engagement: Enabling Current and Future Opportunities

Chilean fresh fruit industry perspective

Eduardo Aylwin Agronomist, Chilean Food Safety and Quality Agency Third Global Minor Use Summit (GMUS-3) Montreal, Quebec, Canada October 1-4, 2017



Alimentos seguros y saludables, tarea de todos y todas

Chile in the global economy

Chile has 26 free trade agreements with 64 markets, representing 64.1% of the world population and 86.3% of global GDP.





Chilean fresh fruits exports 2015 (2015: 2,4 millions tons)



ACHIPIA

Facts



Source: *ASOEX y ProChile (2014), ** FAO (2011), ***Global Trade Information Services GTIS (2015), **** Promar (2011)



Alimentos seguros y saludables, tarea de todos y todas

The Chilean fruit industry has been successful in meeting phytosanitary requirements and food safety standards around the world.





Pesticide Authorization & MRLs settings

The authorization (register) of pesticides in Chile is faculty of SAG, National Agricultural and Livestock Service (Regulation 3670/1999). The process follow guidelines of:

• FAO/WHO International Code of Conduct on Pesticide Management and international conventions and protocols (Rotterdam Stockholm Basel and Montreal)

The Ministry of Health through the dictation of the appropriate technical standard shall determine the **tolerances for residues of pesticides** in food allowed (Regulation No. 33/2010 and No. 762/2011)

In Chile it is not carried out a risk analysis process for the establishment of MRLs and are adopted from CODEX, EU or USA



MRLs settings

Supreme Decree No. 977/96 art 162: "The Ministry of Health through the dictation of the appropriate technical standard shall determine the tolerances for residues of pesticides in food allowed"



Regulation No. 33/2010 and No. 762/2011 (Current regulation)

In Chile it is not carried out a risk analysis process for the establishment of MRLs

Criteria:

- 1. CODEX
- 2. EU or USA MRLs (depending on specific criteria)





Alimentos seguros y saludables, tarea de todos y todas





Adapted from the "Authorized Pesticide List" (SAG, 2017)



Adressing Minor crops issues in Chile

Stakeholders

Regulator	Pesticides industry	Growers and exporters
Agriculture and livestock Service (SAG)	AFIPA (Croplife) IMPPA (Generic)	ASOEX / FEDEFRUTA
Authorization	Request autorizations	Use authorized pesticides



Market need

Pomegranate case

(A fast-growing crop in recent years with few pesticides authorized to control pests)

Growers and exporters	Pesticides industry	Regulator
ASOEX / FEDEFRUTA	AFIPA (Croplife) IMPPA (Generic)	Agriculture and livestock Service (SAG)
ask for new uses	Support new uses	Authorize new uses



Quarantine pest control need

Phytosanitary authority order obligatory controls in host crops. Some crops were not authorized for the recommended pesticides.)

Growers and exporters	Pesticides industry	Regulator
ASOEX / FEDEFRUTA	AFIPA (Croplife) IMPPA (Generic)	Agriculture and livestock Service (SAG)
		Authorized new uses



No market need, no quarantine need?

Is the case of some minor crops in Chile (herbs, spices, specialty vegetables)

Growers and exporters	Pesticides industry	Regulator
ASOEX / FEDEFRUTA	AFIPA (Croplife) IMPPA (Generic)	Agriculture and livestock Service (SAG)
Need pesticides for minor crops	Low interest in support new uses for minor crops	No Authorization



Summary

- Fruit growers and exporters in Chile have shown great adaptability in pest management considering both availability of pesticides, phytosanitary requirements and different official and private MRL standards around the world.
- Minor crops issues in Chile has been solved mostly under quarantine requirement situations and when the market demand is enough. In this cases, there has been engagement of stakeholders to support positive outcomes for minor uses.
- Stakeholders in Chile have not participated in assistance programs to seek solutions.
- There were some initiatives that proposed to jointly finance the effectiveness trials but did not prosper.
- There is a huge challenge for the country and its stakeholders to offer collaborative solutions to the problem of minor uses and to participate actively in regional or international assistance programs.

Acknowledgments







SOURCE OF LIFE







A Regional Look at Grower Challenges and Engagement

Australia

Jodie Pedrana Hort Innovation R&D Manager - Minor Use

Tuesday, October 3rd, 2017

Hort Innovation

Through innovation, Hort Innovation strives to increase the productivity, farm gate profitability and global competitiveness of Australia's horticulture industries.

- Not-for-profit, grower-owned RDC for Australia's \$9.5b horticulture industry
- Invest > \$100m in research, development and marketing programs annually



Hort Innovation

Hort Innovation Minor-Use Program

- Facilitates Strategic Agrichemical Review Process (SARP)
- Data generation projects to support minor-use
- APVMA Permit applications
- Contact for permits/label extensions with the APVMA & Registrants
- Maintains database of industry permits/applications/data
- Provides updates to industry.



Some of the Challenges Industry Face

- Market Failure Limited access to new or existing pesticides
- Timelines to gain access permits / label registrations / new chemistry
- High cost of new pesticides
- Increased environmental and OH&S regulations
- Restrictions and / or loss of pesticides
- Maximum Residue Limit (MRL) / residue issues / violations
- Market requirements Export
- New and emerging pests & diseases
- Pesticide resistance
- Consumer expectations

Hort Innovation

Pesticide Registration Challenges – Market Failure

- The Australian market represents only 1-2% of the global pesticide market
- Market often fails to provide access to suitable registered pesticides for many use patterns (small market & low return on investment)
- Problematic cost/benefit to register minor use when full data packages are required
- Prolonged timeframes can be involved to secure a minor use registration


APVMA National Permit System

- The APVMA's National Permit System adds some flexibility to the approval process and provides a legal framework that can allow access to products for minor-use purposes
- To issue an off-label permit, the APVMA must be satisfied the proposed use will be effective and will not have any adverse effects on humans, the crops, the environment and where relevant trade

Permit Applications

To satisfy the APVMA an application has to have addressed the statutory criteria (safety, efficacy & trade), by using one, or a combination, of the following methods:

- Providing relevant data (efficacy & safety, residues & trade, OH&S & environment)
- Providing a valid scientific argument (extrapolation)
- Using overseas data assessments and decisions

Minor-Use Permits

APVMA Registration Statistics

- Approx. 2/3 of the total volume of pesticides used in Australia is in grain crops
- APVMA receives about 250 permit applications per year,
 - 40% are for renewals
- 900-1000 permits are currently in force
 - 80-90% are for generic products
- 60% of applications are for horticulture; 10-15% are for broad acre crops
- 85% of applications have no trial data submitted and are assessed without provision of <u>new data</u>
- 85% of minor use applications require residue trial data to be provided for renewal
- 2/3 of new plant commodity MRLs come from minor use permits

APVMA Decision

- Issue of a permit –Notification plus any requirements for permit renewal
- How long is a permit issued for?
 - Minor-Use (3 years) with data requirements for renewal
 - Minor-Use (4 -10 years) no outstanding data requirements
 - Emergency Use-Permit (period necessary)
 - Research Permits (1 to 2 years)

Export / Trade and Chemical Review Challenges

Disparate approaches to MRL setting domestically and for import tolerances between countries;

- Varied processes for gaining import tolerances
- Data assessments
- Fees and data requirements
- Who can apply
- Timelines for assessments
- Differing default MRL's
- Differing commodity classifications

Export Compliance

Negative

- Lack of or different use patterns leading to different MRL's
- Can preclude use in export crops

Positive

• Where Codex MRLs recognised/adopted

Import Tolerances

Negative

• Gaining an import tolerance can be complex, expensive and difficult to achieve (data requirements, fees etc)

Positive

• Where Codex MRLs recognised/adopted

Regulatory Methodologies

Negative

- Differing risk philosophies can impact chemical review & new chemistry assessment outcomes causing a disconnect
- Differing toxicological end points (ADI & ARfD)
- Differing residue definitions residue trial data and MRLs don't match between countries

Positive

- Where JMPR recommendations accepted/adopted
- Accepting Codex MRLs

By working together we hope to ensure a sustainable and productive industry for future generations.

Thank you





How Growers Face the MRL Challenge

GLOBAL MINOR USE SUMMIT 3 OCTOBER 3, 2017, MONTREAL, QUEBEC, CANADA

MATT LANTZ VICE PRESIDENT, GLOBAL ACCESS BRYANT CHRISTIE INC. DR. CAROLINE HARRIS Corporate Vice President, Center Director & Principal Scientist Exponent International Ltd.





What We Hope You'll Come Away With

- How Commodity Groups
 Approach MRLs
- Areas of Challenge for MRLs
- Positive Developments and Areas of Cooperation on MRLs







What We All Want to Avoid...







I. How U.S. Commodity Groups Approach MRLs

- Major Transitions
- Day-to-Day Issues







A. MAJOR MRL TRANSITIONS



Other markets with new MRL regulations pending: Mexico; Morocco; Peru, Dominican Republic





A. Major Transitions: U.S. Industry Actions

- Assess MRLs Used and Missing
 in Foreign Market
- Relevant List of Needs: Even if MRL Missing - Possibly Not Issue
- Seek MRLs: Various Systems Employed
- Cooperate with U.S. Government During Transitions
- Engage Early







B. Day-to-Day MRL Issues

- Pro-active Daily Work
- MRL Monitoring: WTO Notices; Providing Comments
- Work with Registrants on new Compounds
- Work with IR-4 on new MRLs
- Assist with Residue Violations





II. Areas of Challenges Growers Face with MRLs

- Timing of MRL Approvals
- Differing Data Requirements
- Generic Products
- Challenging and Out–of– Proportion Sanctions Policies for Violations
- Insufficient Time to Comment or Ignoring Comments
- Codex Resources
 (improving)



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III. Positive MRL Developments and Areas of Cooperation From Our Perspective

- Elevation of MRL Issue
- Unintentional Trade Barrier
- Success in Major Transitions
- Improvement in WTO
 Notifications
- Availability of Data
- International Commodity
 Group Cooperation
- Codex Resources







MRL Resource

- GlobalMRL.com
- All International MRLs
- Updated Daily
- 100+ Markets
- 900+ Active Ingredients
- 700+ Commodities







For More Information on MRLs and International Trade:

- Declining International Cooperation on Pesticide Regulation; Frittering Away Food Security
- https://www.palgrave.com/la /book/9783319605517





E^xponent^{*}

Thank You!

Matt Lantz matthew.lantz@bryantchristie.com +1206-292-6340www.bryantchristie.com

Welcome

Dr. Caroline Harris charris@exponent.com +44 (0) 1423 853201 www.exponent.com

