



Ongoing Training for CanadaGAP Auditors

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SUBJECT: Auditor Guidance re:

- Agricultural Chemical Documentation Requirements for Producers/Packers who are exporting

Agricultural Chemical Documentation Requirements for Producers/Packers who are exporting

Producers who are exporting product must ensure that they are meeting Maximum Residue Levels (MRLs) for agricultural chemicals in the destination market and, during an audit, provide documentation to prove this. The purpose of this note is to give some guidance on what auditors should be looking for as appropriate documentation.

Some producers (or packers) will be able to obtain approved or restricted chemical lists from their customers. This is most common for customers in the UK or other European countries. These lists may or may not include MRLs. Most often MRLs are not included and it is the responsibility of the producer to obtain the MRL list for in the destination country for the agricultural chemicals they are using. A new appendix has been added, Appendix Q, which provides some guidance on how to find this information. In the U.S., MRLs are generally harmonized or are higher than in Canada and most customers have no additional demands or restrictions on chemical use. MRL exceedances occur more often when sending product to Europe and Asia.

The main recommendation given to producers is that they obtain the MRL lists and if the MRL in the destination market is lower than in Canada for a given active ingredient, then the producer should not use that product. If they absolutely need to use the product, they must find some type of guidance/documentation on the appropriate rates and PHI's to meet the MRL. This could be in the form of a foreign label or guidance from the chemical company. Note that if they are providing copies of the foreign label, it will be important to check that the formulation (concentration of the active ingredient) is the same. Having the product labels for similar chemicals in the destination country may be of no value to the producer because formulations are often different as are trade names, therefore the PHI's and rate information may not be applicable to a product manufactured and purchased here in Canada.

A list of MRL databases where producers and packers can find MRL information is included in Appendix Q. For producers shipping into the EU, the EU harmonized standard is acceptable unless the customer has indicated differently. Many smaller countries (outside North America, Europe, Australia and Japan) rely on the Codex Alimentarius MRL standard.

Residue testing:

If a producer/packer is required to undertake residue testing to meet a customer request they should be able to produce the test results as well as documentation that the laboratory was accredited to ISO 17025. Questioning and interviewing the producer/packer is the main way to determine whether residue testing is required by the customer. If the producer/packer is not meeting their customer demands they will not be able to sell their product so this is not an issue for the auditor to spend a significant amount of time investigating.

It is acceptable for a packer to take composite samples that cover several producers in a single test. All producers should be covered in a given year; however, a single sample – which may be 10 apples – could cover a number of producers. More details are provided in Appendix Q.

If the test results show an MRL exceedance, the auditor should ask the producer what corrective actions were taken and where they were recorded (e.g. Form R).

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