

## CanadaGAP Training Note

**TO:** CanadaGAP Auditors, Certification Bodies and Program Participants  
**DATE:** March 23, 2018  
**SUBJECT:** Auditing the MRL Requirements (Section 6.2)

In version 7.1 of the CanadaGAP Food Safety Manuals (that come into effect April 1, 2018) there were changes regarding Maximum Residue Limit (MRL) requirements in Section 6.

Agricultural Chemicals. Section 6.2 Application states:

### FOR ALL COMMODITIES

- The person responsible for the application of agricultural chemicals communicates with the person responsible for selling their product (e.g., packer, wholesaler, broker) and determines if the product is exported or not
- The person responsible for selling the product (e.g., packer, wholesaler, broker) determines whether the product is exported, and if so, communicates with the person responsible for the application of agricultural chemicals

**PRODUCT DESTINED FOR EXPORT MARKETS:** (Note: *both the applicator of the agricultural chemicals and/or the exporter of the product would be the person responsible below*).

- The person responsible ensures that agricultural chemical residues on product do not exceed the published Maximum Residue Limits (MRL) in the destination market. Person responsible:
  - Has information (e.g., registration for the specific product, product labels, Maximum Residue Limits, banned lists, etc.) for agricultural chemicals in destination market(s)
  - Ensures only chemicals approved for use in the destination market(s) are used
  - Ensures chemical applications and application rates for target pests and diseases comply with label recommendations applicable to the destination market(s)
  - Ensures the timing between chemical application and harvest complies with the approved harvest interval in the destination market(s)
  - For those whose customers require agricultural chemical residue testing: Annually - conducts agricultural chemical residue testing of market product using an accredited lab where analyses are performed to standards equivalent to ISO 17025, or participates in a third party agricultural chemical residue monitoring system which is traceable to the farm

*Refer to Appendix Q: Documentation Requirements on Agricultural Chemicals for Exported Product.*

It has been determined that the exporter cannot be the only one responsible for MRLs. The agricultural chemical applicator must also be responsible as they are the ones using the agricultural chemicals. The new requirements reflect what was previously required prior to 2016. Therefore, all operations need to ensure that agricultural chemical residues on their product do not exceed MRLs for product being exported outside of Canada.

For an operation involved in **production**:

The auditee is expected to ask his or her immediate buyer (e.g., packer, shipper, wholesaler, broker, etc.) if the product will be sold outside of Canada. The buyer should know if there are foreign customers, and can provide information to the auditee about agricultural chemical specifications. The auditee needs to know before spraying, if there are agricultural chemicals that shouldn't be used or if the label directions are appropriate.

Asking the questions may prompt the buyer(s) to make some inquiries of their own, and get back to the operation with more information. If this information is not available, there is nothing more that the auditee can do. He has done his due diligence and tried to get as much information as possible before the application of the agricultural chemicals.

The CanadaGAP auditor will want to know if the auditee has had this conversation with his/her buyer. The auditor should also ask to see if the auditee's buyer has provided handouts or other sources of information on MRLs, or about which chemicals can or cannot be used, etc.

For an operation involved in **packing, storage, repacking, wholesaling or brokerage**:

The auditee will need to be aware of different MRLs for the countries that the product is being exported to. They need to know that the product they are shipping to these countries has met any restrictions on agricultural chemical usage. The only way for them to know this is to communicate with their suppliers who are actually doing the spraying.

*There should be proof that this communication has taken place* and that the auditee has considered the MRLs. Some acceptable forms of proof may include:

- Having copies of Form H1 from the operations supplying product (H1 will have information on what is sprayed, rate, etc.)
- A letter that was sent to all suppliers, clearly setting out expectations for suppliers to meet foreign country MRLs, and information about those MRLs (e.g., list of MRLs for specific destinations, website URLs or other sources of information, etc.)
- A list that was provided to all suppliers clearly outlining which agricultural chemicals can and cannot be used.
- Proof of residue testing that was carried out to ensure suppliers were following the MRLs.

For further information refer to *Appendix Q: Documentation Requirements on Agricultural Chemicals for Exported Product*.