

CanadaGAP Training Note

To: CanadaGAP Auditors, Certification Bodies and Program Participants
Date: February 4, 2019
Subject: Clarification on the MRL Requirements (Section 6.2)

This training note is to provide guidance to auditors on how to audit the MRL requirements found in Section 6. Agricultural Chemicals, 6.2 Application, and to clarify what is expected of program participants.

Section 6.2 in the CanadaGAP Food Safety Manuals 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.

Although producers may believe that it is solely the exporter's responsibility to meet foreign country requirements, it must be a shared responsibility between the exporter who sells the product and the producer who grows it. In practical terms, 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. Therefore, all operations need to ensure that agricultural chemical residues on their product do not exceed MRLs for product being exported outside of Canada.

The requirements related to MRLs have changed a couple of times since they were first introduced into the CanadaGAP program in 2011. The current requirements are consistent with what was required prior to 2016, and reflect the fact that adhering to residue limits is a shared responsibility between the producer and the exporter.

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. Before spraying, the auditee needs to know if there are agricultural chemicals that shouldn't be used or if the label directions are appropriate. ***This communication is the auditee's due diligence and must occur before beginning agricultural chemical applications.***

Asking the questions may prompt the buyer(s) to make some inquiries of their own, and to get back to the producer 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 about MRLs, which chemicals can or cannot be used, etc.

If the buyer refuses to provide the information to the auditee, but other information/evidence is available (such as on a website or it's generally known that a particular buyer is exporting product), or if there is another reasonable way to find out if/where product will be exported, the auditee is expected to have made an effort to verify.

If the buyer says they're not sure if the product will be exported, the producer is not expected to inquire further. Usually, this conversation is enough for the buyer to provide details if or when the product's final destination is known.

IMPORTANT

***** It is not necessary to know exactly WHO the end customers are,
only WHERE the customer is selling the product *****

Scoring Question E13 on the audit checklist (three possible options):

- 6/6** appropriate documents (as described above) are observed, or the auditee has done their due diligence to obtain the relevant information about exports ***before beginning agricultural chemical applications***
- 0/6** appropriate documents are not available, or the auditee has not done their due diligence to obtain the relevant information
- N/A** product is NOT exported.

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 fruits and vegetables they are shipping to those countries has met any restrictions on agricultural chemical usage. The only way for them to know that 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.

Scoring Question E13 on the audit checklist (three possible options):

- 6/6** appropriate documents (as described above) are observed, or the auditee has done their due diligence to provide information about the exported product
- 0/6** appropriate documents are not available, or the auditee has not done their due diligence to provide information about the exported product
- N/A** product is NOT exported.

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