



# PPC

**PESTICIDE POLICY COALITION**  
A Coalition Working for Sound Pest Management Policies

December 13, 2019

## **Submission by Pesticide Policy Coalition**

### **United States International Trade Commission**

#### **Investigation No. 332-573**

#### **Global Economic Impact of Missing and Low Pesticide Maximum Residue Levels**

The Pesticide Policy Coalition (PPC or “the Coalition”) submit the following comments to the United States International Trade Commission (USITC) in response to investigation no. 332-573 regarding the global impact of missing and low pesticide maximum residue levels (MRLs).

The PPC is an organization of food, agriculture, forestry, pest management and related industries, including small businesses/entities, which support transparent, fair and science-based regulation of pest management products. PPC members include: nationwide and regional farm, commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers, formulators and distributors; pest and vector-control operators; research organizations; equipment manufacturers and other interested stakeholders. PPC serves as a forum for the review, discussion, development and advocacy around pest management regulation and policy.

PPC provides the following responses to specific sections/questions identified in USITC’s notice dated September 23, 2019 regarding investigation no. 332-573. Additionally, the PPC encourages USITC to consider more detailed comments and materials submitted jointly by CropLife America and CropLife International, including input and background on MRL development and case study examples of the costs and effects of MRL compliance and non-compliance.

**Section 1: An overview of the role of plant protection products and their MRLs in relation to global production, international trade, and food safety for consumers. Describe the current and expected challenges to global agricultural production, including the impact of evolving pest and diseases pressures in differing regions and climates.**

***PPC Response:*** Plant protection products (PPPs) are substances or mixtures of substances intended for preventing, destroying, repelling or mitigating harmful organisms during plant production or storage. PPPs are subject to rigorous risk assessments and regulatory approvals that ensure their safety. Agriculture and horticulture industries rely on PPPs to manage pests and disease that would otherwise cause disruption to the global food supply. PPPs allow farmers to keep production yields on pace with global population growth. PPPs play a vital role in the field and beyond the harvest as they preserve products and protect against damage to products from pests and disease within the supply and prevent these same pests from entering the supply chain. PPPs ensure that product quality and safety survive international trade. PPPs are also used in some seed treatments which reduces pesticide field applications and mitigated off target species exposure.

MRLs are trading standards that facilitate trade among global trading partners. MRLs are not safety limits, rather they indicate whether PPPs were properly applied. Regulators set MRLs to ensure pesticide residues on products are well below toxicological safety thresholds. Inspection programs enforcing MRLs are intended to ensure that domestic consumers in the respective territories of the safety of the imported food supply.

**Section 4: A description of challenges and concerns faced by exporting countries in meeting importing country pesticide MRLs, such as when MRLs are missing or low. Explain the reasons for missing and low MRLs.**

***PPC Response:*** Pesticides may have different registered uses in different parts of the world based on variation in geography, climate, and dietary preferences in different countries. Regulatory authorities differ in criteria for setting MRLs and methodologies for calculating MRLs may also differ. Differences across importing markets in defining, testing, and determining MRLs for the same pesticide chemical and crop can lead to lower MRLs or no MRL being established in the importing country. In markets where an MRL is absent, a product may be rejected or may not be available for use to address production issues in the producing country. In some cases, an absent or unnecessarily stringent MRL in an export market does not prevent a company from selling its PPP for use in the producing country. However, the resulting export crop could be rejected and inflict economic damage to farmer suppliers and supply handlers.

***Conclusion***

For the reasons cited above, PPPs are an essential tool in maintaining and sustaining a global food supply. It is important for appropriate risk-based MRLs to be in place in major global markets to reduce trade and market disruption that economically disadvantages farmer suppliers and creates barriers to providing nutritious, affordable, and safe food for the global population. MRLs should be set following open, transparent, and modern protocols. If MRLs are missing or set arbitrarily lower than needed to ensure safety, then trade is unfairly impacted. This can adversely and unfairly impact agricultural producers in exporting countries.

Sincerely,



Steve Hensley  
Chair, Pesticide Policy Coalition



Beau Greenwood  
Vice Chair, Pesticide Policy Coalition