

23 October 2024

Dear colleagues of the APEC Food Safety Cooperation Forum (FSCF)

***Questionnaire on the Acceptability and Relevance of the  
APEC FSCF Import MRL Guideline for Pesticides***

Under the APEC FSCF regulatory cooperation project (led by Australia), a voluntary guidance document on possible approaches to achieve alignment of international MRLs has been developed and will be published as a formal APEC document entitled “*Import MRL Guideline for Pesticides”.*

The *Guideline* is based on the concept of making best possible use of international, regional or exporting country data assessments and intake risk estimates to support requests for pesticide import MRLs.

Now that the *Guideline* has been circulated and endorsed by APEC FSCF member economies and the Sub-Committee on Standards and Conformance (SCSC), the APEC Wine Regulatory Forum (WRF) has developed this Questionnaire to:-

* determine the extent to which APEC economies are able to apply the approaches suggested in the Guideline when considering requests for pesticide Import MRLs; and
* gather information on possible capacity-building or technical workshops that could facilitate the implementation of the Guideline.

The APEC WRF would greatly appreciate your economy’s contribution to this work by reviewing the attached *Import MRL Submission* examples, completing the following questions and where necessary, adding any additional comments you would like to offer.

Your responses will be summarised and presented to the next meeting of the WRF (in early October 2016). We would be grateful for all FSCF members to note the appended questionnaire and provide responses by **no later than Tuesday 20 September 2016** to the Co-Chairs of the APEC WRF MRL Working Group:

Mr Tony Battaglene (E-mail: [Tony@wfa.org.au](mailto:Tony@wfa.org.au))  
 Mr Dave Lunn (E-mail: [Dave.Lunn@mpi.govt.nz](mailto:Dave.Lunn@mpi.govt.nz))

Thank you in advance for your cooperation.

Ms Jamie Ferman

APEC WRF..?

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| Codex MRLs | Yes | No | NA |
| 1 Does your legislation or national MRL-setting policy allow recognition or adoption of Codex MRLs for imported food | | | |
| a) By automatic recognition (i.e. ‘by reference’ - without the need to individually include them in your national MRL list) |  |  |  |
| i) if no national MRL has been established |  |  |  |
| ii) if a lower national MRL has been established |  |  |  |
| b) By inclusion of specific Codex MRLs into your national MRL list |  |  |  |
| i) if no national MRL has been established |  |  |  |
| ii) if a lower national MRL has been established |  |  |  |
| Comments: | | | |
| 2 If a request for the inclusion of a specific Codex MRL into your national MRL list was supported by the summary information contained in the attached illustrative example (Example A), would this be sufficient for you to consider including the requested MRL in your national MRL list |  |  |  |
| 3 If not, please indicate (and if possible comment on) whether additional information would be needed on: | | | |
| a) the Health Based Guidance Values (e.g. ADI, ARfD) |  |  |  |
| b) the residue definitions (for MRL-compliance and dietary intake assessment) |  |  |  |
| c) the authorised GAP |  |  |  |
| d) the residue data |  |  |  |
| e) the dietary exposure estimate (i.e. whether the consumption figures in the WHO GEMS/Food cluster diet covering your economy are appropriate) |  |  |  |
| Comments | | | |

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| Other (Non-Codex) Import MRLs |  |  |  |
| 4 Does your legislation or national MRL-setting policy allow recognition or adoption of Import MRLs based on other country (trading partner) MRLs | | | |
| a By automatic recognition (i.e. without the need to individually include them in your national MRL list) |  |  |  |
| i) if no national MRL has been established |  |  |  |
| ii) if a lower national MRL has been established |  |  |  |
| b By inclusion of specific trading partner MRLs into your national MRL list |  |  |  |
| i) if no national MRL has been established |  |  |  |
| ii) if a lower national MRL has been established |  |  |  |
| Comments: | | | |
| 5 If a request for the inclusion of a specific trading partner MRL into your national MRL list was supported by the summary information contained in the attached illustrative example (Example B), would this be sufficient for you to consider including the requested MRL in your national MRL list – provided the linked reference sources were to regional or national reviews that have been conducted to the same level of detail and depth as a JMPR assessment |  |  |  |
| 6 If not, please indicate (and if possible comment on) whether additional information would be needed on: | | | |
| a) the Health Based Guidance Values (e.g. ADI, ARfD) |  |  |  |
| b) the residue definitions (for MRL-compliance and dietary intake assessment) |  |  |  |
| c) the authorised GAP |  |  |  |
| d) the residue data |  |  |  |
| e) the dietary exposure estimate (i.e. whether the consumption figures in the WHO GEMS/Food cluster diet covering your economy are appropriate) |  |  |  |
| Comments: | | | |

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| Processed food commodities |  |  |  |
| 7 How does your legislation or MRL-compliance policy address the presence of pesticide residues in processed foods. | | | |
| a) For dried, concentrated or otherwise processed commodities, MRLs established for the raw agricultural commodity (e.g. grapes) also apply directly to the associated processed commodities (e.g. dried grapes, wine) |  |  |  |
| b) Where residues concentrate during processing, and residues in the processed commodity are higher than the MRL for the raw commodity, MRLs are also established for the processed commodity |  |  |  |
| c) For dried, concentrated or dehydrated commodities (such as dried grapes, tomato concentrate, fruit leathers, where only water has been removed during processing), any MRLs established for a raw agricultural commodity are applied after reconstitution (i.e. correcting for water loss) |  |  |  |
| d) For other processed commodities, processing factors are applied to MRLs established for the raw agricultural commodity (e.g. grapes) to determine residue compliance |  |  |  |
| Comments: | | | |

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| Processes and procedures |  |  |  |
| 8 Does your legislation or national MRL-setting policy permit Import MRLs to be submitted by | | | |
| a) Trading partner government agencies or embassies |  |  |  |
| b) Trading partner non-government grower associations or exporters |  |  |  |
| c) Trading partner pesticide registrants or manufacturers |  |  |  |
| d) Others (please specify) |  |  |  |
| Comments: | | | |
| 9 Does your legislation or national MRL-setting policy have any requirements for Import MRL requests to be supported by the data generators (e.g. the pesticide manufacturers) | | | |
| a) When the active ingredient is authorised for use in your country |  |  |  |
| b) When the active ingredient is not authorised for use in your country |  |  |  |
| c) When the active ingredient is no longer under patent protection |  |  |  |
| Comments: | | | |
| 10 Are there any fees associated with making an Import MRL request |  |  |  |
| Comments: | | | |
| 11 Is there a website that provides information on: |  |  |  |
| a) Your national MRLs |  |  |  |
| b) Import MRL policies, procedures and data requirements |  |  |  |
| Comments: | | | |
| 12 Who is the contact point in your national agency responsible for MRL-setting for food of plant origin  Name (optional)  Title:  Agency: | | | |
| 13 Who is the contact point in your national agency responsible for residue testing and MRL-compliance MRL-setting for food of plant origin  Name (optional)  Title:  Agency: | | | |

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| Technical Capacity-building |  |  |  |
| 11 Would capacity-building (e.g. technical workshops) in one or more of the following areas be helpful in supporting your adoption of the Import MRL-setting approaches suggested in the Guideline. | | | |
| a) establishing Health Based Guidance Values (e.g. ADI, ARfD) |  |  |  |
| b) deciding on residue definitions (for MRL-compliance and dietary intake assessment) |  |  |  |
| d) assessing residue data |  |  |  |
| e) estimating dietary intake risks |  |  |  |
| Comments: | | | |