

Codex MRLs—Use and Trends

by Kimberly Berry, Director, Regulatory Data Services, Bryant Christie Inc.

International food standards are developed by the [Codex Alimentarius](#) which was established in 1963 by the Food and Agriculture Organization (FAO) of the United Nations and the World Health Organization (WHO). The Codex international food standards, guidelines and codes of practice are voluntary for countries to reference or employ as part of their national regulations.¹ One of these is the [Codex standard for pesticide maximum residue levels \(MRLs\) in food and feed](#) which is amended each year by the Codex Committee on Pesticide Residues (CCPR).

In recent years there has been concern that an increasing number of countries are moving to establish their own national policies, and away from using the Codex MRL standard. However, a survey of countries' policies indicate that many countries continue to make use of Codex MRLs, and that even for countries with a national standard, Codex MRLs continue to play a role. The Codex MRL standard remains important, but the manner in which these MRLs are applied varies from country to country.

Survey of Countries That Use Codex MRLs

Countries with a national MRL standard, but defer to Codex when a national MRL is not set. Some of these countries also apply U.S., EU, and/or default MRLs in more complex MRL deferral decision trees.

Argentina	Ethiopia	Malaysia	Saudi Arabia
Brazil	French Polynesia	Morocco	Singapore
Brunei	Israel	Nepal	South Africa
Chile	Kenya	New Zealand	Thailand
Costa Rica	Korea	Philippines	

Countries that defer to Codex, and also include deferrals to the U.S. and/or the EU.

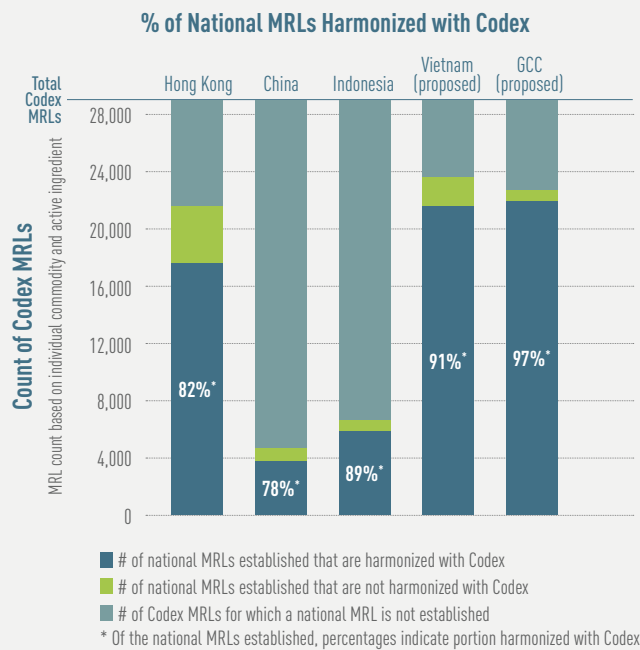
Dominican Republic	Honduras	Paraguay
Egypt	Panama	United Arab Emirates

Countries without a national MRL list may fully defer to Codex.

Afghanistan	Colombia	Lebanon	Sri Lanka
Angola	Cuba	Libya	Sudan
Bahamas	Curacao	Malawi	Syria
Bangladesh	Ecuador	Mozambique	Tanzania
Barbados	El Salvador	Myanmar	Trinidad & Tobago
Belize	Fiji	Nicaragua	Tunisia
Bermuda	Gambia	Nigeria	Uganda
Bolivia	Ghana	Pakistan	Uruguay
Bosnia and Herzegovina	Guatemala	Peru	Venezuela
Cambodia	Jamaica	Senegal	Zimbabwe
	Jordan	Saint Maarten	

Regardless of the policy direction favored, most countries at least use Codex MRLs as a reference point, and so the Codex standard and process for setting new MRLs remain very relevant. Some recent examples of this include Hong Kong's 2014 transition to a national standard; ongoing policy revisions in China and Indonesia; and proposed MRL standards recently drafted by Vietnam and the Gulf Cooperation Council (GCC). The following chart demonstrates that a high percentage of the total MRLs established (or proposed) for each of these countries are adopted Codex MRLs. The chart also indicates the number of missing MRLs for each country as compared to total Codex MRLs. Both China and Indonesia still have many

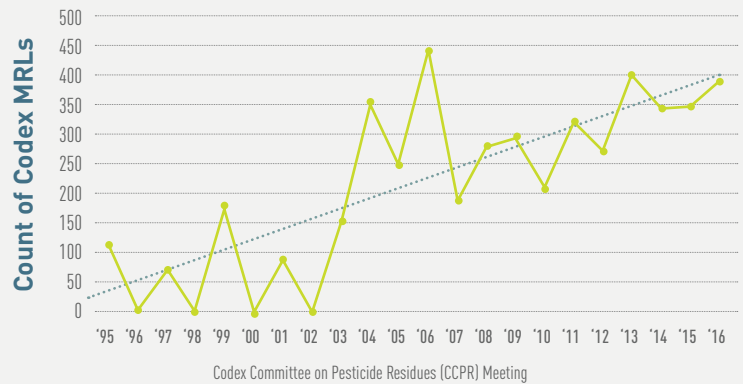
cases where no MRL has been established. This analysis uses pesticide MRL data from GlobalMRL.com for 229 pesticides and 628 commodities covered by the Codex MRL standard.



Because of the importance of Codex MRLs, frustration is often expressed with the number of MRLs established by the CCPR and the difficulty and pace of the process. However, there have been positive developments in the establishment of Codex MRLs over the last decade.

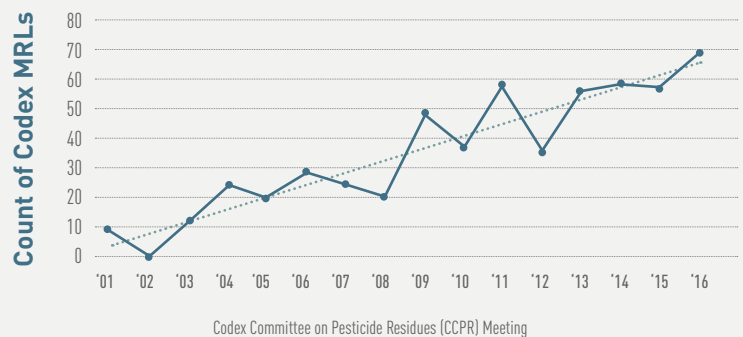
Although the number of Codex MRLs set each year varies, the trend since the early 2000's has been upward as the process has improved. In 2004 the CCPR went from meeting every other year to an annual occurrence, and in 2006 new procedures came into use which elaborated the requirements and timeline for reviewing a country delegation's expressed concern with a proposed Codex MRL. Both of these changes were important for increasing the number of Codex MRLs established as the following chart illustrates.

Number of Codex MRLs Established



The trend in the number of Codex MRLs set on crop groups has also been increasing and more types of crop groups are being included resulting in a greater number of commodities obtaining MRLs.

Number of Codex MRLs set on Crop Groups



More and more countries appear intent on establishing national MRL standards. Their governments may see this as a part of their responsibility to oversee the safety of food products consumed within their borders. Whatever the reason and regardless of the policy direction a government chooses, Codex MRLs will continue to play an important role. They may be used for reference during internal policy setting processes, and they offer an objective global standard that can be helpful when trading partners raise concerns about restrictive MRL standards that present possible trade risks.

Interested parties can track developments on the [Codex website](#) for the 49th session of the CCPR scheduled in April 2017. Bryant Christie Inc. also covers these developments in its weekly MRL News. Sign up to receive that free newsletter [here](#).



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Kimberly Berry is BCI's Director of Regulatory Data Services. She oversees BCI's team of research analysts monitoring food additive and MRL regulations and is responsible for ensuring the accuracy and timely updating of BCI's chemical and food additive regulatory data products including [GlobalMRL.com](#) and [FoodAdditiveDatabase.com](#). Since 2012, Kimberly has served as a private sector member of the U.S. delegation to the Codex Committee on Pesticide Residues (CCPR).

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