



April 21, 2021

**Submitted Via Email**

To Whom It May Concern:

**RE: Japan - WTO Notification - Maximum Residue Limits (MRLs)**

On behalf of the Canadian Produce Marketing Association (CPMA), it is my pleasure to provide comments to the Market Access Secretariat (MAS) to inform Canada's position in response to Japan's Ministry of Health, Labour and Welfare's (MHLW) notification to the World Trade Organization (WTO) of their intent to amend maximum residue limits (MRLs) for Fenpropathrin.

**About CPMA**

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate spanning the entire produce industry. The Association's members include major growers, shippers, packers, and marketers; importers and exporters; transportation and logistics firms; brokers, distributors, and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is today proud to represent over 800 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

**Comments**

To begin, CPMA would like to reiterate the vital role that crop protection tools play in protecting our food and crops from invading weeds, insects, and disease. We also acknowledge that pesticides must be used within the guidelines of good agricultural practices, which consider the needs of environmental quality and human health, as well as agricultural stability and effective pest management. Particularly as we mark the UN International Year of Fruits and Vegetables in 2021, it is imperative that we recognize the essential contribution of crop protection products to the fresh fruit and vegetable sector, one of the most global supply chains in the world.

Promoting international trade and investment with export markets is a priority for the Canadian produce sector. The harmonization of international standards, including pesticide regulation, products, and allowable residues, is essential to increasing market access and ensuring the continued sustainability of the Canadian fresh fruit and vegetable industry, which is one of the most global supply chains in the world. This requires collaboration both within Canadian governmental agencies, and between the Canadian government and other governments with which we trade.

CPMA emphasizes that phytosanitary requirements that are not science-based or essential to security act as effective non-tariff trade barriers between countries and must be eliminated. The harmonization of MRLs should be a goal to remove such barriers to the movement of fresh produce with countries across the globe. Any amendments by Japan's Ministry of Health, Labour and Welfare (MHLW) must therefore ensure that MRLs for Fenpropathrin be based on sound science and an appropriate risk-based approach.

Consumer confidence in the safety of the food supply is eroded when jurisdictions have different regulations, or if there is not sound science behind them. Consistent, evidence based MRLs will serve to boost trade for producers

while also allowing a variety of healthy, safe fresh produce choices to continue to be available to consumers around the world.

Finally, in the event of changes to the MRL for a product, it is necessary that governments consider the availability, cost, and safety of alternative tools in addition to appropriate implementation timelines to ensure a smooth transition and avoid unintended negative impacts to food security or trade.

Thank you again for the opportunity to contribute to Canada's position in response to Japan's Ministry of Health, Labour and Welfare's (MHLW) notification to the World Trade Organization (WTO) of their intent to amend MRLs for Fenpropathrin.

We appreciate you taking the time to review our comments.

Regards,

A handwritten signature in black ink, appearing to be the name 'Ron Lemaire', followed by a horizontal line extending to the right.

Ron Lemaire  
President  
Canadian Produce Marketing Association