Brazilian legislation for setting MRLs for minor-use crops

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Registration of Pesticides in Brazil

3 Federal Agencies Involved

Ministry of Agriculture (MAPA)
- Efficacy Evaluation
- Phytotoxicity
- Resistance Mgmt

Ministry of Health (ANVISA)
- Toxicological Assessment
- MRL and Pre-harvest Interval
- Dietary Risk Assessment

Ministry of Environmental (IBAMA)
- Environmental Assessment
- Evaluation of Potential Environmental Hazards
Why the need for legislation on minor-use crops in Brazil?

- An old demand from the Fruit and Vegetable Sector
- Low offer of pesticides for minor crops:
  - Pesticides misuses
  - Recommendation of non authorized pesticides
- Cost of pesticides registration for minor crops is not attractive for agrochemical industries

Challenge: create a fair system of pesticide registration for minor crops in Brazil
Building the Brazilian Minor Crops Regulation

- Contributions of many players

**Goal**: encourage pesticide registration for minor crops

**How**: principles of crop grouping and representative crop commodities for extrapolation of results from residue trials

**Results**: reduce registration costs without increasing the risks to consumers and field workers
Principles of Crop Grouping and Representative Crops

Parameters for defining groups:

- Botanical similarity
- Eating habits
- Agricultural management
- Regionalization of crop systems
- Availability of active ingredients already registered

If a minor crop is not included in any group, the interested parties may apply for its inclusion by filling a form and submitting a scientific and technical justification.
# How does it work?

## MRL

<table>
<thead>
<tr>
<th>Group</th>
<th>Representative Crop Group</th>
<th>Representative Crop Subgroup</th>
<th>Minor Crops</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Edible Peel Fruits</td>
<td>Apple (<em>Malus domestica</em>)</td>
<td>2A Strawberry or Acerola</td>
<td>Acerola, Blackberry, Olive, Raspberry, Brazilian Cherry, Seriguela, Strawberry, Star Fruit, Fig, Guava, Mangaba, Plum, Quince, Nectarine, Loquat, Peach and Pear.</td>
</tr>
<tr>
<td></td>
<td>Grape (<em>Vitis vinifera</em>)</td>
<td>2B Guava or Persimmon</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2C Passion Fruit or Plum</td>
<td></td>
</tr>
</tbody>
</table>

**Residues Studies (2 years)**

**Inclusion in label and leaflet**
Principles of Crop Grouping and Representative Crops

- The MRL extrapolation from the representative crop to a minor crop is temporary until the residue studies on a representative crop of the subgroup have been concluded.

  - **Representative crop**: needs to be on pesticide label
  - **Dosis** (A.I./ha): lower or equal to representative crop
  - **Pre-harvest interval**: higher or equal to representative crop

- According to the residues studies results, a new value of MRL will be adopted, since it does not impact significantly the Acceptable Daily Intake (ADI).

- Phytotoxicity will cancel the MRL extrapolation and new field data should be conduced.
Overview of Minor Use Pesticides Registration

- Minor Use Pesticides Application: 80
- Concluded Requests: 51
- Ongoing Requests: 29
- Minor Crops Covered: 494
- Targets Pest Covered: 1038
Minor Crops Covered by Pesticides Categories

- Insecticide: 247
- Fungicide: 171
- Bactericide: 47
- Herbicide: 24
- Fungicide/Bactericide: 4
- Insecticide/Acaricide: 1
Target Pests Covered by Pesticides Categories

- Herbicide: 338
- Insecticide: 332
- Fungicide: 282
- Bactericide: 81
- Insecticide/Acaricide: 3
- Fungicide/Bactericide: 2

Pesticides Categories
Challenges for minor-use crops in Brazil

- Increase the minor use pesticides registration (chemical and biological) in order to strengthen the IPM approach: rotation of active ingredients for pest resistance management

- Global MRL harmonization in order to facilitate international trade: support the JMPR/Codex reviews
Thank you!

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