

**MAXIMUM RESIDUE LIMITS FOR CERTAIN AGRICULTURAL
PESTICIDES APPLIED TO SESAME**

Communication from Paraguay

The following communication, received on 16 June 2011, is being circulated at the request of the delegation of Paraguay.

1. Paraguay is concerned about the application by Japan of restrictive maximum residue limits (MRLs) to sesame, and the effects of those limits on trade in this and other products. MRLs for any product should be set on the basis of scientific evidence and should be applied in the least trade-restrictive manner possible.
2. The MRLs applied to sesame are more restrictive than for other similar products, and for many active ingredients the MRLs are fixed as uniform limits. MRLs should be established in the light of international regulations, acceptable daily intake levels, and levels of exposure through food products. Consequently, setting uniform limits is inconsistent with the principles of the WTO Agreement on the Application of Sanitary and Phytosanitary Measures.
3. In the case of the agricultural pesticides imidacloprid and carbaryl, the MRLs for sesame are set as uniform limits. However, for other products, such as grapefruit, groundnuts and broccoli, the MRLs are higher. It should be noted that neither of the two pesticides is included in the MRL table for sesame drawn up by the Japan Food Chemical Research Foundation. According to Japanese regulations and notification No. 497/2005 of the Ministry of Health of Japan, the uniform tolerance limit for pesticides that are not listed in the table is 0.01 ppm.
4. Sesame is of vital social and economic importance for Paraguay: some 500,000 rural inhabitants are involved in its production, which totals approximately 50,000 tonnes. At the same time, the Japanese market is the main destination market, accounting for 80 per cent of Paraguayan exports. Over the past five years, Paraguay has been one of the leading suppliers of sesame to Japan.
5. The competent authorities, together with the exporters, are taking steps to ensure the safety of sesame by implementing the technical regulations governing the identity and quality of sesame (National Plant and Seed Quality and Health Service (SENAVE) Resolution 016/10), conducting risk mitigation programmes, introducing good agricultural practices with training of producers, and establishing a system of traceability for sesame production.
6. The MRLs applied to sesame in Japan are very restrictive, bearing in mind that according to the table of the Japan Food Chemical Research Foundation, less stringent MRLs are applied to other mass consumption products. We therefore urge Japan to revise this measure in such a way as to avoid interrupting the existing flow of trade while still ensuring that there is no risk to consumer health.

7. We would also ask the Government of Japan to consider the international legislation in force for carbaryl and imidacloprid used on similar crops, and include them in the food MRL table for sesame with less stringent limits.
 8. Finally, Paraguay would like to stress its good relations and its close bilateral ties with Japan, and hopes to continue developing its trade with Japan to the benefit of both countries.
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