



AMERICAN SPICE TRADE ASSOCIATION, INC.

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September 22, 2006

Attention: Miriam Halevy  
Pest Management Regulatory Agency, Health Canada  
Sir Charles Tupper Building  
2720 Riverside Drive, A. L. 6606D1  
Ottawa, Ontario, K1A 0K9

e-mail: [Miriam\\_Halevy@hc-sc.gc.ca](mailto:Miriam_Halevy@hc-sc.gc.ca)

Dear Ms. Halevy:

**Re: Discussion Document - Revocation of 0.1ppm as a General Maximum Residue Limit for Food Pesticide Residues [Regulation B.15.002 (1)]**

These comments are submitted on behalf of the American Spice Trade Association (ASTA) on the revocation of 0.1ppm as a General Maximum Residue Limit for Food Pesticides.

ASTA is a trade association that represents the U.S. spice industry. It was founded in 1907 and represents the interests of approximately 175 members including companies that grow, dehydrate, and process spices. ASTA's members include U.S.-based agents, brokers, and importers, and companies based outside of the U.S. that grow spices and ship them to the U.S. and other companies associated with the U.S. spice industry. ASTA members manufacture and market the majority of spices sold in the U.S. at retail and to food processors.

ASTA and the Canadian Spice Association (CSA) have worked with the International Organization of Spice Trade Associations (IOSTA) to develop international standards for pesticide MRLs through the scientific committees of CODEX Alimentarius. Through this work, where risk and safety assessments have been used to develop MRL recommendations, numerous MRLs have been granted for spice classifications.

These tolerances were adopted at the 28th Session of the Commission in Rome, July 4-9, 2005 and are posted on the CODEX Web Site. In the recent 29th Session of the Commission in Geneva July 3-7, 2006 additional MRLs were granted for the capsicum group (chilli peppers and paprika). These MRLs are currently not part of the U.S. Environmental Protection Agency (EPA) tolerances. The Canadian government has been part of this CODEX process and we strongly recommend that these MRLs be adopted as part of the action taken by Health Canada, in large part because spices are an international commodity. Where Codex MRLS do not exist for particular spices, we support PMRA adopting the American tolerances.

The U.S. EPA tolerances are exclusively based upon use following Good Agricultural Practices on crops grown in the United States. Most of the items considered to be spices are not grown in the US, nor are they cultivated on "farms" in the traditional sense, and therefore tolerances have not been sought. Many of the spices and herbs are gathered by collectors from wild crops. ASTA believes that Canada should maintain the General MRL concept, and rely on a General MRL when no appropriate tolerance is available for adoption. A General MRL is particularly useful in cases of inadvertent contamination, e.g. by drift or use of common equipment, or for food ingredients like spices and herbs whose dietary intakes are low. It is estimated for the U.S. that the culinary consumption is less than 0.2% of the diet for the class of spice and herbs. Where the MRL is for a fresh spice or herb, a concentration factor needs to be used because most spices are traded in the dehydrated form and the MRL from the raw agricultural commodity should be converted.

The most effective means to screen raw commodities for pesticide residues is by Multiresidue Methods (MRMs). These methods can provide assurance from gross environmental contamination for numerous classes of pesticide compounds, such as chlorinated hydrocarbons, pyrethrums, and organophosphates. Although the MRMs can examine for upwards of 300 compounds at a time, they have a limitation with sensitivity. Adopting lower than 0.1 ppm standards will make these methods obsolete and reliance will need to be made on a compendium of more expensive Single Residue Methods. Considering the low risk to human safety based on the very low culinary consumption of spices, we feel the prudent approach would be to maintain the 0.1 ppm general tolerance.

Thank you for the opportunity to submit written comments. If you have questions or would like additional information please contact me at 202-367-1207.

Sincerely,

Cheryl Deem  
Executive Director