



INFORMATION REGARDING EXPORT OF POTATOES TREATED WITH SMARTBLOCK®

MAXIMUM RESIDUE LIMITS (MRLs) AND TOLERANCES

A tolerance or MRL is the maximum amount of a pesticide that can be on a raw product when it is used and still be considered legal for trade purposes. Under the Federal Food, Drug, and Cosmetic Act (FFDCA), a raw agricultural product is deemed illegal for trade purposes if it contains a pesticide residue, unless the residue is within the limits of a tolerance established by EPA or is exempt from the requirement. The FFDCA requires EPA to establish these residue tolerances.

Additionally, MRLs or tolerances are what govern residues for legal trade purposes. The Codex Alimentarius (CODEX) is a joint food standards program of the United Nations Food and Agriculture Organization (FAO) and the World Health Organization (WHO). CODEX develops international food safety and quality standards, including Maximum Residue Limits (MRLs) for pesticides. A CODEX MRL does not exist for 3-decen-2-one because it is regulated in international trade as a food additive and by the Joint FAO/WHO Expert Committee on Food Additives (JECFA).

SMARTBLOCK REGULATORY STATUS

- Registered by the US Environmental Protection Agency (EPA) in February of 2013 **with an exemption from the requirement for a tolerance.**
- Approved in Canada by the Pest Management Regulatory Agency (PMRA) with an exemption from the requirement of a tolerance and is in the final public comment phase. Full registration of SmartBlock in key Canadian provinces is expected to be completed by July 2013.
- Registration is pending in the European Union.
- Registration will be sought in other countries based on commercial fit in those markets.

There are no CODEX or other MRLs established in countries for SmartBlock use as a sprout inhibitor on potatoes. However, based on our discussion with the Head of the US Delegation to CODEX, we do not believe these are required because 3-decen-2-one is regulated as food additive.

WHY SMARTBLOCK SHOULD BE EXEMPT FROM THE REQUIREMENT OF GLOBAL MRLs:

- The active ingredient in SmartBlock (3-decen-2-one) is an approved food additive, which is chemically synthesized, but identical to the naturally occurring substance.
- 3-decen-2-one occurs naturally in porcini mushrooms, Iberian ham, skipjack tuna, yogurt and other foods.
- The Joint FAO/WHO Expert Committee on Food Additives (JECFA 2003 monograph) reports that 3-decen-2-one is listed among a group of compounds identified in foods such as fruits, juices, spices, vegetables, cocoa, coffee and tea. Evaluations by JECFA on 3-decen-2-one have concluded that there is no safety concern at current levels of intake.
- 3-decen-2-one is approved as a direct food additive by the US Food and Drug Administration (FDA) as a synthetic flavoring and adjuvant (21 CFR 172.515) and by the European Food Safety Authority as a flavoring agent (07.121, Chemical Group 5). The allowable levels of 3-decen-2-one as a food additive are much higher than any residues you might find on treated potatoes.
- 3-decen-2-one is also classified as FEMA-GRAS (Generally Regarded as Safe) when used as a food additive.
- In Japan, 3-decen-2-one is included on the approved positive list as a food additive under Ketones (see link: www.tinyurl.com/cwpy2vg).