



December 4, 2017

The Honorable Ted McKinney  
Under Secretary of Agriculture for Trade and Foreign Agricultural Affairs  
1400 Independence Ave., SW  
Washington, DC. 20250

Dear Mr. Secretary,

Let me first congratulate you on your confirmation by the United States Senate. On behalf of all of your former colleagues within the NASDA family, we couldn't be more proud to boast of you, Under Secretary Ibach, and Under Secretary designee Northey and your past affiliation as members of NASDA.

I write to you today regarding an issue within the European Commission (EC) related to establishment of Maximum Residue Levels (MRL's) for pesticide use. Specifically, the EC has proposed - and may soon adopt - a new policy where (i) existing maximum residue levels (MRLs) would be lowered to the level of detection (.01ppm) and (ii) requests for import tolerances (ITs) would be rejected – for pesticides which are not approved for renewal in the EU based solely on an EC “hazard-based cut-off criteria” classification.

As you know, NASDA has long advocated regulatory policies that are not only risk-based and economically justified, but also promote trade in food and agricultural products across the globe. NASDA has likewise championed regulatory harmonization among our trading partners through direct dialogue such as was held during our recent meeting with our counterparts in Canada and Mexico at the 26<sup>th</sup> meeting of the Tri-National Agricultural Accord.

The proposal of the EC follows a continuing path within that bloc of adopting a hazard-only approach to regulation which ignores the science of risk assessment and threatens global trade in food and agricultural products. Some observers have estimated that if finalized, the policy the EC is pursuing could negatively impact upwards of 60% of the estimated value of all agricultural imports of the European Union. Specialty crop growers are particularly concerned about an impending reclassification by the EC of the fungicide propiconazole which if adopted could have significant implications for growers and post-harvest uses in particular and broader implications for US agriculture and global trade.

We urge you, particularly in light of the recent announcement of Secretary Perdue to grant you oversight of the U.S. Codex Office, to use all means at your disposal to engage the EC and encourage adoption of science-based regulatory policies.

Sincerely,

A handwritten signature in black ink that reads "Barbara P. Glenn". The signature is written in a cursive, flowing style.

**Barbara P. Glenn, Ph.D.**  
*Chief Executive Officer*