

April 3, 2026

Cecilia Monclova, Ph.D.
Agricultural Science Advisor
Plant Division, Trade Policy and Geographic Affairs
USDA Foreign Agricultural Service
1400 Independence Ave SW
Washington, DC 20250

Re: Canada WTO notification concerning the proposed changes to existing pome fruit MRLs for Dithiocarbamates (mancozeb) and EBDC (CAN-SPS-1637).

Dear Dr. Monclova:

The Northwest Horticultural Council (NHC) and California Pear Advisory Board (CPAB) urgently request the USDA Foreign Agricultural Service's (FAS) assistance to preserve the Canadian market for U.S. pear growers.

The NHC represents the growers, packers, and shippers of apples, pears, and cherries in Washington, Oregon, and Idaho. Our growers produce 78 percent of the fresh apples (producing 70 percent of all apples grown in the U.S.), 85 percent of the fresh pears, and 70 percent of the fresh sweet cherries grown in the United States. Our industry annually exports about 30 percent of the apple, pear, and cherry crops to more than 40 countries worldwide.

The California Pear Advisory Board (CPAB) is a state agricultural marketing order, which represents over 100 pear farmers across the state of California. The California pear industry produces over 21 percent of the fresh pears grown and sold in the United States, and 39 percent of all Bartlett pears, which account for 50 percent of all U.S. pear production. This production supports the livelihoods of pears growers, packers, and shippers across the state.

Canada is the second largest export market for the pear producers in the Pacific Northwest region of the United States. In 2025, the region's pear growers shipped about 577,000 forty-four-pound boxes of pears to Canada, with a value of more than \$20.7 million. Canada is the largest export market for California pears. In 2025, 2,352MT of California pears were shipped to Canada.

The proposed revocation of the mancozeb pear MRL (currently set at 7 ppm), and the subsequent application of a 0.1 ppm default by PMRA, will likely destroy Canada as a viable export market for U.S. growers this season and until such time as alternative products are available for use. We request USDA's strong intervention with Health Canada's Pest Management Regulatory Agency (PMRA) so that this devastating non-tariff trade barrier is not enacted.

We offer the below comments to assist FAS in its effort to protect U.S. pear growers from harm:

PMRA’s proposed revocation of the MRL diverges from other modern/contemporary risk assessments, including those of the U.S., Codex, and the European Union (EU), which are protective of human health. See table 1.

Table 1. **Pear Mancozeb MRLs**

Commodity	MRLs (ppm)				
	Canada (current)	Canada (proposed)	U.S.	EU	Codex
Pear	7	0.1	0.6	5	5

Mancozeb is a multi-site contact fungicide, classified as a Fungicide Resistance Action Committee (FRAC) Group M3. It is a broad-spectrum protectant with a low risk of targeted pathogens evolving resistance. As a multi-site fungicide, mancozeb is an important part of resistance management programs in pear and apple orchards for fungicide rotations targeting control of multiple pathogens concurrently. Mancozeb is used in Pacific Northwest tree fruit production mainly to control apple scab (*Venturia inaequalis*) and pear scab (*Venturia pyrina*) from the delayed dormant stage through petal fall stage. Mancozeb is also applied at petal fall for pome fruit finish enhancement – a critical component of fruit quality. Mancozeb is the only fungicide from the FRAC M3 group that remains registered for use in Pacific Northwest pear orchards. Other non-M3 alternatives perform poorly on fruit finish.

In California in 2023, according to USDA-NASS statistics, 289,300 pounds of mancozeb was applied to California pears, making it a critical substance for the crop.

Due to the importance of mancozeb in managing pome fruit diseases, fungicide resistance management, and fruit finish enhancement, we ask USDA to intervene with the government of Canada and secure an MRL harmonized to the U.S. or Codex tolerance. Harmonization between the United States and Canada will benefit growers in both countries, help ensure MRL compliance, and maintain this important trading partnership between our two countries.

PMRA should consider that mancozeb has a unique residue definition, and there could be naturally occurring background levels in fruit. Due to the residue definition, low-level residues can be detected in a variety of crops, including pears, even in the absence of recent use. Notably, the [European Food Safety Authority](#) concluded that these background levels in pears warranted a 0.1 ppm limit of quantification, underscoring that detectable residues are not necessarily indicative of improper or unsafe use.

Additionally, due to the recent notification, pear growers are already applying mancozeb in pear orchards this season. An MRL revocation at this stage will have immediate and severe trade consequences for growers, compounding the challenges facing an already struggling farming sector. We ask FAS to also request PMRA grant a minimum of a three-year grace period. This would provide the pear industry with the necessary time to work collaboratively with the registrant to generate data in support of a new MRL, allow growers continued access to mancozeb’s essential disease protection, maintain access to the critical Canadian export market, and allow for the development of alternative products.

In closing, if the revocation of the pear tolerance goes into effect, U.S. pear growers will effectively lose the Canadian market, their second largest export destination. The corresponding negative economic impact for pear growers who are already facing incredible financial distress will be significant.

Thank you for your urgent attention to this request.

Sincerely,

Northwest Horticultural Council

California Pear Advisory Board