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CODEX COMMITTEE ON PESTICIDE RESIDUES

52<sup>nd</sup> Session

(Virtual)

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**European Union Comments on**

**RECOMMENDATIONS CONCERNING THE REVIEW OF THE  
INTERNATIONAL ESTIMATE OF SHORT-TERM INTAKE  
EQUATIONS**

**(Codex Circular Letter CL 2021/42-PR)**

**CX/PR 21/52/15**

*European Union Competence*

*European Union Vote*

The European Union (EU) would like to thank the Electronic Working Group (eWG) on the review of the IESTI equations chaired by the European Union and co-chaired by Brazil and Uganda for the preparation of the Discussion Paper on the review of the international estimate of short-term intake (IESTI) equations (document CX/PR 21/52/15).

**Sections 1-3** (Benefits/advantages and challenges of the current IESTI methodology; Benchmarking of IESTI calculations against probabilistic exposure estimates; Review of the parameters of the IESTI equation)

**Conclusions** (paragraph 58, bullets 1 and 3).

The EU agrees with the conclusions set out in paragraph 58, bullets 1 and 2 and the related presentation of the details in sections 1 and 3 of the discussion paper. The analysis of the benefits and challenges of the current IESTI methodology reflects the challenges identified in the EU, in particular the challenges for risk communication and the lack of data to verify the level of protection achieved with the IESTI methodology. The review of the parameters of the IESTI equations is clear and comprehensive. The EU considers that TOR (i) are sufficiently addressed in this regard. The EU has no strong views on where the information should reside, it should however be publicly available and easy to retrieve from the Codex website.

#### Conclusions (paragraph 58, bullet 2).

However, as regards the Conclusion in the second bullet of paragraph 58, the EU considers that the benchmarking of the IESTI calculations against probabilistic exposure estimates, as presented in section 2 of the discussion paper, does not sufficiently address TOR (i).

The EU is of the view that the study design and the methodology used in the study had some serious deficiencies, which compromise the validity of the study. In particular, the EU questions the representativeness of the exposure calculation, which was based on a limited subset of food products, which does not sufficiently represent for the total food intake and therefore is likely to underestimate the overall exposure.

#### Recommendations (paragraph 59, bullets 1-3).

The EU strongly support the follow up by JMPR on the work presented in the discussion paper analysing the strengths and weaknesses of the parameters of the IESTI equations.

The EU regrets that due to the late publication of the FAO/WHO study on the probabilistic exposure assessment, the eWG was not able to derive final conclusions on the benchmarking of the outcomes of the IESTI equations to probabilistic distributions of actual exposures. The EU is of the view that risk communication remains an issue that can only be addressed with a more substantial change of the existing equations. The EU therefore strongly supports the re-establishment of the eWG and is willing to continue its work as chair of this eWG to drive this work forward. The EU will however also reflect on its own way forward on this important topic, should it become clear that continuation of the eWG or follow up by JMPR is not supported by the CCPR.

#### **Section 4** (Information on bulking and blending)

#### Conclusions (paragraph 58, bullet 4)

The EU appreciates the information on bulking and blending compiled in the Appendix of the Discussion Paper and considers that TOR (ii) are sufficiently addressed.

#### Recommendations (paragraph 59, bullet 4)

The EU considers that JMPR should follow up on the compiled information on bulking and blending when reviewing case 3 of the IESTI methodology.