ANNEX A

FORM FOR EXPRESSING CONCERNS WITH ADVANCEMENT OF AN MRL OR REQUEST FOR CLARIFICATION OF CONCERNS

Submitted by: The European Union

Date: 29 June 2016

Pesticide/Pesticide Code Number	***Food/Food Code Number***	***MRL (mg/kg)***	***Present Step***
287 Quinclorac	Cranberry /FB 0265 Rhubarb /VS 0627	1.5 0.5	5/8 5/8

Is this a request for clarification? No

Request for clarification *(Specific statement of clarification requested)*

Is this a concern? Yes

Is this a continuing concern? No

Concern *(Specific statement of reason for concern to the advancement of the proposed MRL)*

Quinclorac methyl ester, which is ten times more toxic than quinclorac, was not included in the residue definition for enforcement.

We acknowledge that in 2016 MRLs were proposed only for cranberry and rhubarb and that the amount of quinclorac methyl ester in these crops would be expected to be low (in the strawberry metabolism study ca. 10% of TRR was in the form of quinclorac methyl ester). However, we also noted that for 2017 new uses on canola (rape seed) and rice will be assessed by JMPR, and we think the residue definition should be reconsidered. Not including the methyl ester may underestimate the risk for consumers.

Indeed, in rape seed the methyl ester occurred in a similar or higher concentration as the acid. Considering the higher toxicity of the methyl ester, we think it would be appropriate to include the methyl ester in the residue definition and to use the toxicological reference values for the methyl ester to perform the risk assessment

It is noted that in the US and Canada quinclorac methyl ester has been included in the residue definition for quinclorac when assessing compliance with the quinclorac MRL (EPA 2013,

Health Canada 2014).

Tittlemier *et al* (2016) showed that quinclorac residues were present in all samples of rape seed treated with a quinclorac-containing herbicide that were analysed from the 2015 Canadian harvest. Quinclorac was found in 93% of samples, with an average of 0.018 mg/kg. All samples contained quinclorac methyl ester, with an average of 0.061 mg/kg. The average concentration of total residues (as quinclorac equivalents) on treated canola was 0.075 mg/kg, with a range of 0.016–0.124 mg/kg.

In addition, the methyl ester may actually be used in formulated products as active substance; if this is the case, the available metabolism studies would not be sufficient.

Do you wish this concern to be noted in the CCPR Report?

Data/Information *(Description of each separate piece of data/information which will be provided to the appropriate JMPR secretary within one month of the CCPR meeting)*

EPA 2013: https://www.federalregister.gov/articles/2013/11/29/2013-28640/quinclorac-pesticide-tolerances

Health Canada 2014: Proposed maximum residue limit PMRL 2014-15, quinclorac. Ottawa (ON): Government of Canada. http://www.hc-sc.gc.ca/cps-spc/alt_formats/pdf/pest/part/consultations/_pmrl2014-15/pmrl2014-15-eng.pdf

Tittlemier et al 2016: Food Addit Contam Part A Chem Anal Control Expo Risk Assess. 2016 Jun;33(6):1003-9. doi: 10.1080/19440049.2016.1179133. Epub 2016 May 13