

European Union Comments
CODEX COMMITTEE ON PESTICIDE RESIDUES

50th Session

Haikou, 09 - 14 April 2018

Agenda Item 6

Draft and proposed draft maximum residue limits for pesticides in food and feed at steps 7 and 4
Comments at Steps 6 and 3

(CL 2018/11-PR)

European Union Competence

European Union Vote

The EU would like to thank JMPR for the high scientific quality of its report and has the following comments:

General comment

The EU would like to **comment** that the MRLs and also the currently taken positions for propiconazole, tebuconazole, difenoconazole and prothioconazole might be revised in future, pending an evaluation of triazole derivative metabolites in the EU.

5.4 Captan (007)

The EU would like to **comment** that besides the analytical issues identified by JMPR, metabolism studies for root crops would be required to set an MRL on ginseng.

5.6 Chlormequat (015)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **Barley**
- **Oats**
- **Triticale**
- **Wheat**
- **Rye**
- **Grapes**
- **Milks**
- **Poultry meat**
- **Poultry fats**
- **Meat (from mammals other than marine mammals)**
- **Mammalian fats (except milk fats)**
- **Edible offal (mammalian)**
- **Poultry, edible offal of**
- **Eggs**

The EU would like to **comment** that in the EU, residues are expressed differently and different definitions of certain commodities of animal origin (muscle/fat vs meat) are applied. The MRL values to be set in EU legislation may therefore differ numerically from those proposed by JMPR.

5.9 2,4-D (020)

The EU **supports** the conclusion of JMPR: the questionable storage stability of both 2,4-D and 2,4-DCP in cotton seed trials prevents the evaluation of the trial data.

Given that 2,4-DCP concentration is two times higher than the concentration of 2,4-D in treated cotton seeds, the EU would like to **comment** that 2,4-DCP toxicity should be evaluated

5.36 Thiophanate-methyl (077)

The EU **reserves its position**, pending the outcome of the ongoing periodic re-evaluation in the EU.

The EU would like to **comment** that in the most recent EU assessment of thiophanate-methyl, no toxicological reference values were

derived. EU risk assessors considered thiophanate-methyl a clastogenic substance for which no threshold is assumed and could not rule out a potential for aneugenicity.

5.26 Oxamyl (126)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Brussels sprouts
- Carrot
- Cherry tomato
- Edible offal (mammalian)
- Eggplant (includes all commodities in this subgroup)
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Melons, except Watermelon
- Milks
- Parsnip
- Peppers, chili (dried)
- Potato
- Subgroup of eggplants (includes all commodities in this subgroup)
- Subgroup of peppers (except martynia, okra and roselle)
- Sugar beet
- Tomato
- Watermelon

The EU introduces a **reservation to the advancement** of proposed draft MRLs for the following commodities:

- Cucumber
- Squash, summer

The proposed draft MRLs cannot be taken over in EU legislation because **acute health risks** were identified for a group of EU consumers.

The EU would like also to **comment** that two draft MRL were proposed for **eggplants**, one for the individual crop (crop code **VO0440**) and a second one for the **subgroup of eggplants** (crop code **VO2016**). To avoid confusions, the MRL for the individual crop (crop code **VO0440**) could be deleted.

5.29 Propiconazole (160)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs the following commodities, pending the outcome of an ongoing review. For this review EFSA could not finalise consumer assessment due to data gaps and no conclusion could be drawn on the genotoxicity and the general toxicity of several metabolites:

- **Subgroup of oranges, sweet, sour (including orange-like hybrids)**
- **Subgroup of mandarins (including mandarin-like hybrids)**
- **Subgroup of lemons and limes (including citron)**
- **Subgroup of pummelo and grapefruits (including shaddock-like hybrids)**
- **peach**
- **subgroup of cherries (includes all commodities in this subgroup)**
- **Subgroup of plum including prunes) (includes all commodities in this subgroup)**
- **Pinapple**

The EU would like to **comment** that for post-harvest uses, the MRLs should be calculated as mean + 4SD, considering that for post-harvest uses a more homogeneous residue distribution is expected. Thus, the MRL proposals derived by JMPR seem to be too high. Furthermore, a metabolism study for post-harvest uses is required.

5.12 Fenpropimorph (188)

The EU would like to **comment** that different residue definitions appear in Annex 1 of JMPR summary report and on page 161 of JMPR report. The EU would like, to have the confirmation that the residue definitions reported in on page 161 of JMPR report are the correct ones.

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **Rye**

It is not appropriate to extrapolate the draft MRL for rye from the draft MRL for wheat as the GAPs for wheat and rye are different.

- **Bananas**

An acute consumer risk has been identified for European consumers.

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Barley
- Oats
- Rye
- Triticale
- Wheat
- Sugar beet
- Wheat

5.35 Tebuconazole (189)

The EU **reserves its position**, pending the outcome of the ongoing periodic re-evaluation in the EU.

- Subgroup of Beans with pods (includes all commodities in this subgroup)

5.14 Fenpyroximate (193) (R/T)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Apple
- Avocado
- Apricot
- Grapes
- Strawberries
- Raspberry
- Squash, summer
- Subgroup of Eggplants (includes all commodities in this subgroup)
- Subgroup of Beans with pods (includes all commodities in this subgroup)
- Potato
- Maize
- Tree nut
- Hops, dry
- Tea, green, black, dried
- Milks

The EU **reserves its position** on the proposed draft MRLs for the following commodities:

- **Pear**
- **Cucumbers**
- **Melons, except watermelon**

Pending the outcome of an ongoing review of the substance in the EU. Using the lower ARfD of JMPR, an intake concern was identified for the EU.

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **Subgroup of Peppers (except Martynia, Okra and Roselle)**

The residue trials used to derive the MRL proposal were analysed only for the parent compound. Thus, the HR and STMR values are likely to underestimate the total residues (sum of fenpyroximate and M-1).

- **Group of Citrus fruit (includes all commodities in this group)**

According to the current EU guidelines the proposed extrapolation is not supported. Moreover, the peeling factor used in the risk assessment could not be verified, without which it was not possible to exclude an acute risk to consumers.

- **Coffee beans**

The residue trials used to derive the MRL proposal were analysed only for the parent compound. Thus, the HR and STMR values are likely to underestimate the total residues (sum of fenpyroximate and M-1).

- **Meat (from mammals other than marine mammals)**

- **Edible offal (mammalian)**

- **Mammalian fats (except milk fats)**

The enforcement residue definition for animal commodities in the EU differs from the definition applied by JMPR.

The EU **opposes to the advancement** of the proposed draft MRLs for the following commodities:

- **Subgroup of Cherries (includes all commodities in this subgroup)**
- **Peach**
- **Subgroup of Plums (including fresh prunes) (includes all commodities in this subgroup)**
- **Watermelon**
- **Tomato**

An acute consumer risk has been identified by JMPR.

5.22 Imidacloprid (206)

The EU **supports** the conclusion of JMPR: the supplied data do not match the GAP for **pistachio nuts** and do not allow any MRL proposal.

5.8 Cyprodinil (207)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **Artichoke, globe**
- **Carrot**
- **Celery**
- **Guava**
- **Subgroup of Beans with pods(includes all commodities in this subgroup)**
- **Potato**
- **Tree nuts (except almond and pistachio)**

The EU introduces a **reservation to the advancement** of the proposed draft MRL for the following commodity:

- **Pomegranate**

As metabolism studies in fruit crops are available only for foliar uses, it is unclear whether the fate of residues following post-harvest use is comparable with foliar use. As the GAP is a post-harvest treatment, the MRL should be calculated as “mean + 4 SD” and an MRL proposal of 5 mg/kg would be sufficient.

5.37 Trifloxystrobin (213)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **Cotton seed**
- **Ginseng**
- **Spinach**

The EU introduces a **reservation to the advancement** of the proposed draft MRL for the following commodity:

- **Cabbages, Head**

The EU has a different policy to apply the same commodity definition, i.e. whole plant after removal of roots and decayed leaves, to derive both the MRL and the STMR and HR.

5.10 Difenoconazole (224)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- Pome fruits

A chronic and an acute risk for European consumers are identified.

- Rice

EU MRLs for rice are set for husked rice and no processing factor is available to derive such MRL.

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Blueberries

- Strawberries

- Pitaya (dragon fruit)

- Watermelon

- Peppers, chili

- Peppers, chili, dried

The EU would like to **comment** that the trial results for peppers, chili and the processing factor of 4.5 lead to a MRL of 4 mg/kg for **peppers, chili, dried**. The CXL of 5mg/kg for peppers, chili, dried should therefore be replaced by 4 mg/kg

- Sweet corn (corn on the cob) (kernels plus cob with husk removed)

- Subgroup of dry beans (except soya bean)

- Subgroup of dry peas (includes all commodities in this subgroup)

- Ginseng, dried

- Globe artichoke

- Coffee beans

5.2 Azoxystrobin (229)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Pitaya (dragon fruit)

- Sugar cane

- Rape seed

5.29 Prothioconazole (232)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Cotton seed
- Milks
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Edible offal (mammalian)
- Eggs
- Poultry edible offal
- Poultry fats
- Poultry meat

5.34 Spinetoram (233)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Subgroup of mandarin
- Subgroup of cherries
- Apricot
- Currant, Black, Red, White
- Strawberry
- Table olives
- Litchi
- Mango
- Passionfruit
- Leek
- Subgroup of Fruiting vegetables, Cucurbits - Cucumbers and Summer squashes (includes all commodities in this subgroup)
- Melons, except watermelon
- Subgroup of Peppers (except Martynia, Okra and Roselle)
- Soya bean (dry)
- Potato
- Husked rice
- Maize

- **Sweet corn (Corn on the cob) (kernels plus cob with husk removed)**
- **Cotton seed**
- **Poultry meat**
- **Poultry, edible offal**
- **Poultry fats**
- **Eggs**

The EU introduces a **reservation to the advancement** of the proposed draft MRL for the following commodities:

- **Subgroup of plums**

The proposed draft MRL based on combining 10 trials approximating the GAP and 11 trials with a higher number of applications is unnecessarily high (0.09 mg/kg). Ten trials approximating the GAP are considered sufficient to derive an MRL (0.015 mg/kg).

- **Avocado**

Only in two trials the treatment regime did not differ significantly from the cGAP. From the information presented in the JMPR evaluation and the JMPR report, it is not clear how the scaling factors were calculated.

- **Persimmons**

The critical GAP for persimmons differs from the cGAP for pome fruit. Therefore it is not appropriate to extrapolate the MRL from pome fruit to persimmon.

- **Milks**

- **Meat (from mammals other than marine mammals)**

- **Edible offal (mammalian)**

- **Mammalian fats (except milk fats)**

Since cabbage/kale was not included in the dietary burden calculation, the proposed MRL for animal products should be reconsidered.

5.17 Fluopyram (243)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **Artichoke, globe**
- **Barley**
- **Basil**
- **Cotton seed**
- **Dill seed**
- **Edible offal (mammalian)**

- Eggs
 - Hops (dry)
 - Mammalian fat
 - Mango
 - Meat (from mammals other than marine mammals)
 - Oats
 - Onion, Welsh
 - Peanut
 - Potato
 - Poultry fat
 - Poultry meat
 - Poultry, Edible offal of
 - Pummelo and Grapefruits (including Shaddock-like hybrids, among others Grapefruit)
 - Rye
 - Soya bean (dry)
 - Spring onion
 - Subgroup of Bush berries (includes all commodities in this subgroup)
 - Subgroup of Cane berries (includes all commodities in this subgroup)
 - Subgroup of Cherries (includes all commodities in this subgroup)
- The EU would like to **comment** that despite the limited number of residue trials available for evaluation, the proposed draft MRL is acceptable, taking into account the similarity to the existing EU-MRL.
- Subgroup of Dry Beans (except Soya bean (dry))
 - Subgroup of Eggplants (includes all commodities in this subgroup)
 - Subgroup of Lemons and Limes (includes all commodities in this subgroup)
 - Subgroup of Maize Cereals (includes all commodities in this subgroup)
 - Subgroup of Mandarins (includes all commodities in this subgroup)
 - Subgroup of Oranges, Sweet, Sour (includes all commodities in this subgroup)
 - Subgroup of Peppers (except Martynia, Okra, Roselle)
 - Sunflower seed
 - Sweet corn (Corn on the cob) (kernels plus cob with husk removed)
 - Tomato
 - Triticale

- **Wheat**
- **Witloof chicory (sprouts)**

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **Milks**

A long-term consumer health risk was identified. The overall chronic exposure accounted for 205% of the ADI. The food item with the largest contribution to the most critical diet and for which a CXL has been proposed was milk representing the 158% of the ADI.

- **Rice**

In the EU, a different commodity definition is applied, and processing data allowing a recalculation of the MRL value are not available.

- **Subgroup of Dry Peas (includes all commodities in this subgroup)**

The number of residue trials was insufficient to be in accordance with the FAO Manual.

5.1 Acetamiprid (246)

The EU **supports** the conclusion of JMPR: the supplied data do not match the GAP for pistachio nuts and do not allow any MRL proposal.

5.24 Isopyrazam (249)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **Group of Pome fruits(includes all commodities in this group)**
- **Cucumbers**
- **Melon, except watermelon**
- **Peppers, Sweet (including pimento or pimiento)**
- **Tomato**
- **Subgroup of Eggplants (includes all commodities in this group)**
- **Carrot**
- **Barley**
- **Wheat**
- **Rye**
- **Triticale**
- **Rape seed**
- **Peanut**

<ul style="list-style-type: none"> - Mammalian fats (except milk fats) - Meat (from mammals other than marine mammals) - Edible offal (mammalian) - Milks
<p>5.24 Propylene oxide (250)</p> <p>The EU supports the conclusion of JMPR: the supplied residue data do not allow any MRL proposal.</p>
<p>5.33 Saflufenacil (251)</p> <p>The EU introduces a reservation to the advancement of the proposed draft MRL for the following commodities:</p> <ul style="list-style-type: none"> - Mustard seed - Linseed <p>The proposed draft MRLs for commodities of plant origin cannot be taken over in EU legislation because they are derived for a different enforcement residue definition.</p>
<p>5.28 Picoxystrobin (258)</p> <p>The EU introduces a reservation to the advancement of the proposed draft MRLs the following commodities due to several health concerns identified in the EFSA peer review, including possible genotoxicity of picoxystrobin and its main plant metabolites:</p> <ul style="list-style-type: none"> - Barley - Edible offal (mammalian) - Eggs - Maize - Maize oil, edible - Mammalian fats (except milk fats) - Meat (from mammals other than marine mammals) (fat) - Milks - Oats - Oat straw and fodder, dry - Pea hay or pea fodder (dry)

<ul style="list-style-type: none"> - Popcorn - Poultry, edible offal of - Poultry fats - Poultry meat - Rye - Soya bean oil, refined - Subgroup of dry beans (includes all commodities in this subgroup) - Subgroup of dry peas(includes all commodities in this subgroup) - Sweet corn (corn-on-the-cob) (kernels plus cob with husk removed) - Triticale - Wheat
<p>5.16 Fluensulfone (265)</p>
<p>5.21 Imazapyr (267)</p> <p>The EU introduces a <u>reservation to the advancement</u> of the proposed draft MRL for the following commodity:</p> <ul style="list-style-type: none"> - Barley <p>The number of available residue trials is lower than required by EU policy, in combination with an inhomogeneous distribution of trial results.</p>
<p>5.20 Imazamox (276)</p> <p>The EU introduces a <u>reservation to the advancement</u> of the proposed draft MRLs for the following commodity:</p> <ul style="list-style-type: none"> - Barley <p>Imazamox is under review in the EU and EFSA advises an enforcement residue definition that is not compatible with the one decided by JMPR, as it includes the metabolite CL 263284 for plant products.</p>
<p>5.15 Flonicamid (282)</p> <p>The EU introduces a <u>reservation to the advancement</u> of the proposed draft MRLs for the following commodities:</p> <ul style="list-style-type: none"> - Subgroup of beans with pods(except soya bean (succulent seeds in pods))

- **Subgroup of peas with pods**
 - **Subgroup of succulent beans without pods (except soya bean (succulent seeds))**
 - **Subgroup of succulent peas without pods**
 - **Subgroup of dry beans (except soya bean (dry))**
 - **Subgroup of dry peas**
- The proposed draft MRLs for commodities of plant origin cannot be taken over in EU legislation because they are derived from a different residue definition for enforcement.

5.18 Flupyradifurone (285)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **Subgroup of Cherries (includes all commodities in this subgroup)**
- **Subgroup of Peaches (including Nectarine and Apricots) (includes all commodities in this subgroup)**
- **Subgroup of Plums (including fresh Prunes) (includes all commodities in this subgroup)**

The proposed draft MRLs cannot be taken over in EU legislation because they are derived for a different enforcement residue definition.

5.32 Quinclorac (287)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **Rape seed**

In view of the high toxicity of quinclorac methyl ester (10 times more toxic than the parent) and its high occurrence in rape seed (up to 400% of the parent compound), the EU considers it appropriate to include quinclorac methyl ester in the enforcement residue definition, at least for rape seed. The 2017 JMPR noted in its report that quinclorac methyl ester is included in the enforcement residue definition for rape seed in the countries where the critical GAP is authorised on which JMPR based its MRL proposal.

- **Rice, husked**

The samples of the supervised field trials were not analysed for the full residue definition for risk assessment. The use of an indicative conversion factor from metabolism studies to estimate the residues of the more toxic metabolite is leading to a high uncertainty. Considering that the dietary exposure to residues via rice is close to the ARfD, this high level of uncertainty is not acceptable. Moreover, the definition of commodity is different in the EU and insufficient data is available to derive a robust processing factor.

- **Edible offal (mammalian)**

- **Eggs**

- **Mammalian fats (except milk fats)**

- **Meat (from mammals other than marine mammals)**

- **Milks**

- **Poultry, Edible offal of**

- **Poultry fats**

- **Poultry meat**

The calculation of the livestock dietary burden included feed items derived from rape seed and rice. The reservation to the advancement of the proposed draft MRLs for animal commodities is a consequence of the reservations for rape seed and rice.

The EU would like to comment that it needs to be verified whether routine enforcement methods are also covering quinclorac conjugates.

5.3 Bicyclopyrone (295)

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- **Sweet corn (Corn on the cob) (kernels plus cob with husk removed)**

- **Barley**

- **Maize**

- **Wheat**

- **Sugar cane**

- **Milk of cattle, goats and sheep**

- **Mammalian fats (except milk fats)**

- **Meat (from mammals other than marine mammals)**

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities:

- **Edible offal (mammalian)**

Using the ARfD of JMPR, an intake concern was identified for the EU.

5.7 Cyclaniliprole (296)

In its peer review in 2016, EFSA could not finalise the consumer risk assessment because of the data gaps relating to the toxicological assessment, including genotoxic potential of metabolites NK-1375, YT-1327, BCPBA and BPQO. The EU introduces therefore a reservation to the advancement of the proposed draft MRLs for the following commodities:

- **Subgroup of Cherries**

(includes all commodities in this subgroup)

- Cherry Tomato
- Subgroup of Cucumbers and
- Summer Squashes

(includes all commodities in this subgroup)

- Subgroup of Eggplants (includes all commodities in this subgroup)
- Subgroup of Flowerhead Brassicas (includes all commodities in this subgroup)
- Subgroup of Head Brassicas (includes all commodities in this subgroup)
- Subgroup of Leaves of Brassicaceae Brassica spp. (includes all commodities in this subgroup)
- Subgroup of melons, pumpkins and Winter squashes (includes all commodities in this group)
- Subgroup of Peaches (including Apricots and Nectarines) (includes all commodities in this subgroup)
- Subgroup of Peppers (except Martynia, Okra and Roselle)
- Group of Pome fruits (includes all commodities in this group)
- Subgroup of Plums (includes all commodities in this subgroup)
- Grapes
- Tomato

JMPR used a new tool that was developed to model the residue behaviour and would predict residue concentrations for a given GAP from residue trials that differ in terms of application rates, treatment intervals, PHI.

However, there is no information available regarding the necessary validation of this tool.

- Meat (from mammals other than marine mammals)
- Edible offal (mammalian)
- Mammalian fats (except milk fats)
- Milks
- Milk fats

5.11 Fenazaquin (297)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- Subgroup of cherries
- Hops, dry

In the EU, separate risk assessments are conducted for fenazaquin and the metabolite TBPE due to the different toxicological reference values (TBPE is of higher toxicity than fenazaquin). Since no residue data on TBPE were reported by JMPR, the EU could not ascertain the

acceptability of the proposed draft MRLs and reserves its position.

5.13 Fenpyrazamine (298) (R,T)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **Subgroup of Cherries(includes all commodities in this subgroup)**
- **Subgroup of Plums(includes all 2 commodities in this subgroup)**
- **Subgroup of Peaches(includes all commodities in this subgroup)**

The EU would like to **comment** that for these 3 subgroups it calculated different MRLs using the same data but based on individual European geographical zones, while JMPR pooled all the available data of the different zones. The proposed draft MRLs should therefore be reconsidered as follows:

For the **subgroup of Cherries**, the results of the 8 trials in the north EU zone lead to a MRL of 4 mg/kg instead of 3 mg/kg.

For the **Subgroup of Plums**, the results of the 8 trials in the north EU zone lead to a MRL of 3 mg/kg instead of 2 mg/kg.

For the **Subgroup of Peaches**, the results of the 12 trials in the south EU zone lead to a MRL of 5 mg/kg instead of 4 mg/kg.

- **Subgroup of Cane berries (includes all commodities in this subgroup)**
- **Subgroup of Bush berries(includes all commodities in this subgroup)**
- **Grapes**

The EU would like to **comment** that the OECD calculator provides a MRL of 3 mg/kg and that the draft proposed MRL of 4 mg/kg should be corrected down to this value.

The EU would like also to **comment** that on the basis of a MRL of 3 mg/kg for grapes, the draft proposed MRL for dried grape should be set at 9 mg/kg.

- **Strawberry**
- **Cucumber**
- **Peppers, sweet (including pimento or pimiento)**
- **Tomato**
- **Cherry tomato**
- **Subgroup of eggplants(includes all commodities in this subgroup)**
- **Lettuce, Head**
- **Lettuce, Leaf**
- **Ginseng**
- **Almond**
- **Mammalian fats (except milk fats)**

<ul style="list-style-type: none"> - Meat (from mammals other than marine mammals) - Milks - Edible offal (mammalian)
<p>5.23 Isoprothiolane (299)</p> <p>The EU <u>supports the advancement</u> of the proposed draft MRLs for the following commodities:</p> <ul style="list-style-type: none"> - Rice, husked - Meat (from mammals other than marine mammals) - Milks - Mammalian fats (except milk fats) - Edible offal (mammalian)
<p>5.25 Natamycin (300)</p> <p>The EU is <u>opposed to the advancement</u> of the proposed draft MRLs for the following commodities:</p> <ul style="list-style-type: none"> - Citrus fruit (includes all commodities in this group) <p>The residue definition is not sufficiently supported by experimental data and no toxicological reference values are available to perform a dietary risk assessment.</p> <p>The EU would like also to <u>comment</u> on the following deficiencies:</p> <ul style="list-style-type: none"> - lack of storage stability data; - nature of residues in edible part of the crop expected to be different due to hydrolytic degradation under acidic conditions; and - method to calculate the MRL for post-harvest uses is “mean + 4 SD” for Po, which leads to a MRL proposal of 4 mg/kg.
<p>5.27 Phosphonic acid (301)</p> <p>See fosetyl.</p>
<p>5.19 Fosetyl Aluminium (302) (R,T)</p> <p>The EU would like also to <u>comment</u> that the residues for enforcement are expressed as fosetyl in the EU, while they are expressed as</p>

phosphonic acid by JMPR. If adopted, the proposed draft MRLs will be recalculated to match with the EU residue definition.

The EU **supports the advancement** of the proposed draft MRL for the following commodity:

- Avocado
- Cucumber
- Edible offal (mammalian)
- Grapes
- Group of pome fruits (includes all commodities in this group)
- Hops (dry)
- Lettuce, head
- Lettuce, leaf
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Melon (except water melon)
- Milks
- Peppers, sweet, (including pimento or pimiento)
- spinach
- Strawberries
- Summer squash
- Tomato
- Tree nuts (includes all 400 commodities in this group)

Concerning the proposed draft MRL for the group **tree nuts**, the EU would like to **comment** that it will not apply it to **coconut**, as different extrapolation rules apply in the EU.

5.38 Triflumezopyrim (303) (R/T)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- Rice, husked
- Meat (from mammals other than marine mammals)
- Mammalian fats (except milk fats)

- **Edible offal (mammalian)**
- **Milks**
- **Poultry meat**
- **Poultry fats**
- **Poultry, Edible offal of**
- **Eggs**