

**European Union Positions
for the 54th Session of the Codex Committee on Pesticide Residues
Beijing, China, 26 June - 1 July 2023**

Agenda Items 5(b) and 6:

**Draft and Proposed Draft Maximum Residue Limits for Pesticides in Foods and Feeds at Steps 7 and 4
Comments at Steps 6 and 3**

<u>Text proposed for common position</u>
General comments for discussion in CWP
General comments <p>The EU would like to inform CCPR Members that the CXLs that were adopted by the 45th Session of the Codex Alimentarius Commission, and for which the EU had not introduced reservations during CCPR53, have now been established in the EU.</p> <p>It is an EU policy to align EU MRLs with Codex MRLs (CXLs) provided that:</p> <ul style="list-style-type: none">• the EU sets MRLs for the commodity under consideration;• the current EU MRL is lower than the CXL. <p>The EU will make reservations to the advancement of the proposed Codex MRLs during the discussions on the specific substances:</p> <ul style="list-style-type: none">• if toxicological data are not available at EU level or are available but not yet assessed at EU level, and/or• if the proposed CXL is not safe for European consumers¹, and/or• if the proposed CXLs are not sufficiently supported by data as required according to the FAO manual or other agreed requirements, and/or• if the CXL is not acceptable to the EU with respect to areas such as supporting data, and extrapolations, as well as environmental issues of global

¹ Including an assessment that the Codex residue definition ensures an equivalent level of protection.

nature (such as the decline of pollinators or the accumulation of persistent bioaccumulative and toxic substances in the environment).

Items 5(b)

Chlorothalonil (81)

The EU acknowledges the JMPR responses to the concerns raised on chlorothalonil, and its conclusion that the exposure to the degradation product R613636 is not expected to be a safety concern.

The EU does not agree with this conclusion. It is based on processing studies using unprocessed cereal products with residues much lower than the CXL, so that the exposure calculations may underestimate the exposure. Additionally, processing studies for animal products are not available, whereas CXLs are established for milk, meat and other animal products. These products are consumed after processing and are an important component of the human diet.

Additionally, the EU identified additional concerns on metabolites R182281 (SDS-3701) and R417888 on the lack of an appropriate in vivo follow-up for positive results in the mammalian gene mutation assays with both metabolites. Several in vitro gene mutation assays were available for both metabolites. JMPR considered an overall call for in vitro mammalian gene mutation as negative (considering all studies results), whereas for the EU, uncertainties over the results of in vitro mammalian gene mutation assays (inconsistent results) trigger in vivo follow-up.

Therefore, the EU still expresses the same concerns, and considers that the genotoxic potential of metabolites R613636, R182281 (SDS-3701) and R417888 is inconclusive.

Terbufos (167)

The EU acknowledges the JMPR responses to the concerns raised by CCPR53 on terbufos, and its conclusion that anticipating the scheduled periodic review for this substance would not be necessary.

The above conclusions were derived based on an assessment of the acute neurotoxicity study used in the derivation of the toxicological reference values for terbufos. Nevertheless, the EU highlights that the concerns on the outdated toxicological assessment of terbufos were of general nature, and not restricted to the acute neurotoxicity study only, and were raised because a toxicological assessment of terbufos and metabolites expected in food is not available. In addition, the EU notes that terbufos is listed in table 2B of the priority list as no longer supported by the manufacturer.

The EU invites CCPR to confirm such non-support, and taking into consideration the public health concern raised, the EU recommends withdrawing all the existing Codex MRL for terbufos and removing it from the Codex index of pesticides.

Items 6

Chlormequat (015)

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

- **Milks,**
- **Poultry fats,**
- **Poultry meat.**

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

- **Barley,**
- **Edible offal (mammalian),**
- **Eggs,**
- **Mammalian fats (except milk fats),**
- **Meat (from mammals other than marine mammals),**
- **Poultry edible offal of,**
- **Wheat.**

For **edible offal (mammalian), eggs, mammalian fats (except milk fats), meat (from mammals other than marine mammals), poultry edible offal** of the result of the feeding study was rounded up to a higher MRL than necessary. Therefore, the EU invites JMPR to review these Codex MRL proposals.

For **barley** and **wheat**, additional clarification on the information on the residue trials and the critical good agricultural practice (cGAP) presented in the JMPR report would be needed. Once the JMPR evaluation would be available, the EU will perform a more detailed assessment of the compound and based on the outcome, this reservation could be revised.

The EU notes that the dietary burden calculations were not included in the JMPR report. Therefore, the EU invites JMPR to present all calculations in the JMPR report, in order to improve transparency.

Diazinon (022)

The EU **supports the proposed withdrawal** of the MRLs for all commodities. In addition, the EU recommends deleting diazinon from the priority list of pesticides for evaluation

Dimethoate (027) / Omethoate (055) (addendum)

The EU **introduces a reservation** to the advancement of the proposed draft MRLs the following commodities due to several health concerns identified in the European Food Safety Authority peer review, including possible genotoxicity of dimethoate and its metabolite omethoate:

- **Mandarins, subgroup of,**
- **Avocado,**
- **Brussels sprouts,**
- **Tomato,**

- Yard-long bean (pods),
- Dry beans, subgroup of (except soya bean),
- Rape seed,
- Wheat,
- Edible offal (mammalian),
- Mammalian fats (except milk fats),
- Meat (from mammals other than marine mammals),
- Milks,
- Eggs,
- Poultry fats,
- Poultry meats,
- Poultry, Edible offal of.

In a recent EU assessment, a genotoxicity concern could not be excluded for residues to which consumers will be exposed. In the absence of EU toxicological reference values for metabolite dimethoate and its metabolite omethoate a reliable EU risk assessment cannot be conducted.

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

- Oranges, subgroup of

since a short-term exposure exceedance of the acute reference dose was indicated by JMPR.

Mancozeb (050) - Dithiocarbamates (105)

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

- Cottonseed,
- Longan,
- Maize,
- Rice, husked,
- Soya bean.

Based on the outcome of the ongoing evaluation, this reservation could be revised.

Methidathion (051)

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

- **Apple,**
- **Cherries, Subgroup of,**
- **Grapes,**
- **Mandarins (including mandarin like hybrids) (subgroup),**
- **Tea, green, black (black, fermented and dried).**

In addition, the EU recommends deleting methidathion from the priority list of pesticides for evaluation.

Omethoate (055)

Quintozene (064)

The EU supports the proposed withdrawal of the MRLs for all commodities.

In addition, the EU recommends deleting quintozene from the priority list of pesticides for evaluation.

Metalaxyl (138)

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

- **Pineapple**
- **Ginseng, dried including red ginseng.**

Bifenthrin (178)

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities pending the ongoing review of MRLs in the EU for certain non-approved substances for which the toxicological reference values do not comply with the current scientific standards:

- **Avocados,**
- **Peanuts,**
- **Pomegranate,**
- **Eggplant, subgroup of,**
- **Peppers, Subgroup of (except okra, martynia and roselle).**

The EU opposes the advancement of the proposed draft MRLs for

- **Group of Pome fruits (except Japanese persimmon),**
- **Peaches, subgroup of,**

since a short-term exposure exceedance of the acute reference dose was indicated by JMPR.

Famoxadone (208)

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

- **Hops, dried,**
- **Tomato.**

For the proposed MRL on **hops**, the EU notes that there is a need to check details in JMPR evaluation if the application rate (2x) was made for all individual applications and whether the other GAP parameters are matching in the residue trials.

For the proposed MRL on **tomatoes**, the EU notes that there is a need to check details in JMPR evaluation on the representativeness of the residue trials supporting the GAP.

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

- **Bulb onions, subgroup of,**
- **Cane berries, subgroup of,**
- **Fruiting vegetables - cucurbits, subgroup of,**
- **Peppers, chili,**
- **Peppers, sweet.**

For the proposed MRLs on **peppers, chili** and **pepper, sweet**, an acute consumer risk has been identified for European consumers.

For the proposed MRL on **fruiting vegetables, cucurbits, subgroup of**, the proposed number of residue trials for summer squashes used to derive the MRL is insufficient for major crops, according to the Information Document on the Application of the Guidance to Facilitate the Establishment of MRLs for Pesticides for Minor Crops (referred to in Annex D to the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues, Codex Procedural Manual). Therefore, the EU invites JMPR to consider deriving a separate Codex MRL for cucumbers, based on the available residue trials on cucumbers, and for summer squashes, based on the available residue trials on summer squashes.

The EU notes that, for **bulb onions, subgroup of**, and **cane berries, subgroup of**, the residue trials are not representative of the presented good agricultural practices (GAP).

Fludioxonil (211)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities, pending the outcome of the ongoing periodic re-evaluation in the EU:

- **Banana,**
- **Beans with pods, subgroup of,**
- **Dry beans, subgroup of,**
- **Dry peas, subgroup of,**
- **Edible offal, mammalian,**
- **Mango,**
- **Mammalian fats (except milk fats),**
- **Meat (from mammals other than marine mammals),**
- **Milks,**
- **Papaya,**
- **Peas with pods, subgroup of,**
- **Sugar beet,**
- **Tree nuts (except Canarium nut, Chilean hazelnut, and pistachios).**

Based on the outcome of the ongoing evaluation, this reservation could be revised.

For tree nuts (**except Canarium nut, Chilean hazelnut, and pistachios**), the combined data set for almonds and pecan nuts should be used for deriving the MRL. Therefore, the EU invites JMPR to review the Codex MRL proposal. This is supported by a Mann-Whitney U-Test.

Indoxacarb (216) R

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

- **Bushberries, Subgroup of,**
- **Beans with pods, Subgroup of (except soya bean),**
- **Beans, dry, Subgroup of (except cowpea, mung bean and soya bean),**
- **Beetroot,**
- **Milks,**
- **Edible offal (Mammalian),**
- **Mammalian fats (except milk fats),**
- **Meat (from mammals other than marine mammals),**
- **Maize cereals, Subgroup of,**
- **Tree nuts.**

An acute risk with the CXL for **bushberries, beans with pods, beetroot, milks and swine meat** was identified for EU consumers.

For **beans (dry), maize cereals, tree nuts, mammalian edible offals, fats, and meat**, safety could not be confirmed due to the uncertainties on the toxicity and genotoxicity metabolites and degradation products (IN-P0036, KT413, IN-MP819, IN-TMG00 and IN-MK638) formed during sterilization and processing at high temperature.

The EU notes that it has submitted a concern form asking for prioritisation of the periodic review of indoxacarb, based on concerns with the existing toxicological reference values last evaluated in 2005.

Difenoconazole (224) R

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities pending the outcome of the ongoing periodic re-evaluation in the EU:

- **Goji berry,**
- **Group of fruiting vegetables,**
- **other than cucurbits (except peppers, chili),**
- **Group of fruiting vegetables other than cucurbits (except goji berry and pepper, chili),**
- **Pencil yam,**
- **Ginger, rhizome,**
- **Tea, green, black (black, fermented and dried).**

Based on the outcome of the ongoing evaluation, this reservation could be revised.

The EU notes that an assessment strategy for triazole derivatives metabolites (TDMs) is applicable in the EU. Residue definitions for risk assessment and toxicological reference values have been revised. The EU notes that an assessment for TDMs has not been carried out for difenoconazole.

Azoxystrobin (229)

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

- **Mango**
- **Papaya,**
- **Sugar beet,**
- **Root and tuber vegetables, Group of (except potato and sugar beet).**

Chlorantraniliprole (230)

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

- **Avocado,**
- **Tea, green, black (black, fermented and dried).**

Mandipropamid (231)

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

- **Basil, leaves,**
- **Fruiting vegetables, Cucurbits - Cucumber and Summer squashes, Subgroup of Fruiting vegetables, Cucurbits,**
- **Melons, Pumpkins and Winter squashes, Subgroup of,**
- **Peppers, Subgroup of (except Martynia, Okra and Roselle),**
- **Tomatoes, subgroup of.**

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

- **Bulb Onions, Subgroup of,**
- **Eggplants, Subgroup of,**
- **Ginseng, dried including red ginseng.**

For **bulb onions, Subgroup of,** and **ginseng, dried, including red ginseng,** an evaluation concerning toxicological properties of metabolites of concerns for root crops groups is currently ongoing. Based on the outcome of the ongoing evaluation, this reservation could be revised.

For **eggplants, Subgroup of,** the EU notes that JMPR proposed the extrapolation from residue trials in sweet peppers and not from tomatoes, but this extrapolation is not in line with the Codex extrapolation rules. Therefore, the EU recommends to review the proposed Codex MRL. Extrapolation rules depend on representative commodities in the entire group or subgroup, i. e., one cultivar of large variety eggplant and/or tomato and one cultivar of small variety eggplant and/or tomato.

Emamectin benzoate (247) R

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

- **Basil, leaves,**
- **Brassica leafy vegetables, subgroup of,**
- **Chives,**
- **Mammalian fats (except milk fats),**
- **Meat (from mammals other than marine mammals),**
- **Edible offal (mammalian),**
- **Spinach,**
- **Soya bean (dry),**
- **Tea, Black, Green, dried and fermented.**

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

- **Flowerhead brassicas, subgroup of,**
- **Milks.**

The critical GAP in Italy is for uses authorized on broccoli and cauliflower separately, which leads to separate MRL values for broccolis (0.007 mg/kg) and cauliflowers (0.002 mg/kg).

For milks, based on the results of feeding studies, a lower value of 0.001* mg/kg should be set.

Flutriafol (248)

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

- **Almonds,**
- **Barley,**
- **Edible offal, mammalian,**
- **Eggs,**
- **Mammalian fats (except milk fat),**
- **Meat (from mammals other than marine mammals),**
- **Milks,**
- **Poultry, edible offal of,**
- **Poultry fats,**
- **Poultry meat,**
- **Rice, husked.**

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

- **Rice.**

The EU notes that the proposed draft MRL is based on an Italian GAP, which is no longer supported. Therefore, the EU recommends CCPR to retain the draft MRL at step 4 and invite its members to send other GAPs supporting the proposed MRL or fall back GAPs allowing to derive a new proposal for an MRL.

The EU notes that an assessment strategy for triazole derivatives metabolites (TDMs) is applicable in the EU. Residue definitions for risk assessment and toxicological reference values have been revised. The EU notes that an assessment for TDMs has not been carried out for flutriafol.

Sulfoxaflor (252)

The EU introduces a reservation to the advancement of the proposed draft MRLs pending the outcome of an ongoing evaluation in the EU for the following commodities:

- **Globe artichoke,**

<p>- Sunflower seeds, Subgroup of.</p> <p>Based on the outcome of the ongoing evaluation, this reservation could be revised.</p>
<p>Benzovindiflupyr (261)</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"> - Blueberries, - Ginseng, dried including red ginseng, - Maize.
<p>Flupyradifurone (285)</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"> - Pineapple, - Sunflower seeds (subgroup), - Sesame seed.
<p>Quinclorac (287)</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"> - Cranberries, - Rape seeds. <p>The EU reiterates the recommendation of including the metabolite quinclorac methyl ester in the residue definition for enforcement. Quinclorac methyl ester could be also a variant of the active substance used in plant protection products. If the use of quinclorac methyl ester is authorised, then more toxic methyl ester residues could be generated. Based on the available information from the JMPR evaluations it is not possible to conclude if the use of quinclorac methyl ester is authorised.</p> <p>The EU invites to quinclorac sponsor to clarify if the formulations placed on the market contain quinclorac methyl ester.</p>
<p>Spiromesifen (294) R</p> <p>The EU <u>supports the advancement</u> of the proposed draft MRLs for the following commodities:</p>

- **Subgroup of oranges, Sweet, Sour,**
- **Mango,**
- **Papaya,**
- **Beans with pods (Phaseolus spp.) immature pods and succulent seeds),**
- **Beans without pods (Phaseolus spp.) (succulent seeds),**
- **Dry beans, subgroup.**

Fenzaquin (297) R

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities pending the outcome of the ongoing periodic re-evaluation in the EU, and due to diverging residue definitions:

- **Lemons and Limes (inc. citron), Subgroup of,**
- **Oranges, Sweet, Sour (incl.**
- **orange-like hybrids), Subgroup of,**
- **Pummelo and Grapefruits (incl. Shaddock-like hybrids, among other Grapefruit), Subgroup of,**
- **Mandarins (incl. Mandarin-like hybrids), Subgroup of,**
- **Apples,**
- **Plums, Subgroup of,**
- **Peaches (incl. Nectarine and Apricots), Subgroup of,**
- **Cane berries, Subgroup of,**
- **Bush berries, Subgroup of,**
- **Small fruit vine climbing, Subgroup of,**
- **Low growing berries, Subgroup of,**
- **Avocado,**
- **Fruiting vegetables, Cucurbits, Group of,**
- **Tomatoes, Subgroup of,**
- **Peppers, Subgroup of (except martynia, okra and roselle),**
- **Eggplants, Subgroup of,**
- **Edible offal (Mammalian),**
- **Mammalian fats (except milk fats),**
- **Meat (from mammals other than marine mammals),**
- **Milks.**

Based on the outcome of the ongoing evaluation, this reservation could be revised.

The residue definition for risk assessment in the EU includes the more toxic metabolite TBPE.

Additionally, an acute risk with the CXL for **peaches** was identified for EU consumers.

Afidopyropen (312) R

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities based on the lack of available toxicological data at EU level and pending the outcome of the review by the EU of the JMPR evaluation:

- **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,**
- **Sorghum,**
- **Strawberries.**

Based on the outcome of the ongoing evaluation, this reservation could be revised.

Additionally, the EU notes that the RD for enforcement should be reconsidered for **muscle/meat** and **milk**, as parent compound is considered not a valid marker substance based on livestock metabolism and feeding studies.

Based on the residue trials reported, the OECD MRL calculator suggests a lower MRL of 0.15 mg/kg for **sorghum**, instead of 0.2 mg/kg, and 0.1 mg/kg for strawberries, instead of 0.15.

For some feed items, the commodity description does not comply with the new classification agreed in 2021 (e.g., AL 1020 – Alfalfa, fodder, instead of Alfalfa, hay and/or straw, AL 1031 – Clover, fodder, instead of Clover, hay and/or straw, AS 0162 – Grass, hay instead of Hay and/or straw of grasses for animal feed. As regards sorghum feed, it seems more appropriate to set the CXL for sorghum stover (code AS 3561) as the MRL refers to the dry product. Hence, the commodity code should be corrected (AS 0651 refer to sorghum, forage (green)).

Pyridate (315) R/T

Triflumuron (317)

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

- **Soya bean (dry),**

- **Milks,**
- **Edible offal (Mammalian),**
- **Meat (from mammals other than marine mammals),**
- **Mammalian fats (except milk fats).**

For **soya bean (dry)**, JMPR is invited to provide additional clarification on the conversion factor for M02 used in the calculation performed to obtain the STMR.

For the sake of transparency, the EU invites JMPR to consider preparing an addendum to the JMPR Monograph presenting the new information on triflumuron metabolites that were assessed by JMPR in 2022.

Mefentrifluconazole (320) R/T

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

- **Lemons and Limes (including Citron), Subgroup of,**
- **Mandarins (including Mandarin-like hybrids), Subgroup of,**
- **Oranges, Sweet, Sour (including Orange-like hybrids), Subgroup of,**
- **Pummelo and Grapefruits (including Shaddock-like hybrids, among others Grapefruit), Subgroup of,**
- **Cherries, Subgroup of,**
- **Plums (including fresh Prunes), Subgroup of,**
- **Peaches (including Nectarine and Apricots), Subgroup of,**
- **Cane berries, Subgroup of,**
- **Bush berries, Subgroup of,**
- **Elderberries,**
- **Guelder rose,**
- **Wine grapes,**
- **Low growing berries, Subgroup of,**
- **Avocado,**
- **Banana,**
- **Mango,**
- **Papaya,**
- **Bulb Onions, Subgroup of,**
- **Green Onions, Subgroup of,**
- **Fruiting vegetables, Cucurbits - Cucumbers and Summer squashes, Subgroup of,**
- **Fruiting vegetables, Cucurbits – Melons, Pumpkins and Winter Squashes, Subgroup of,**
- **Tomatoes, Subgroup of,**
- **Peppers, Subgroup of (except martynia, okra and roselle),**
- **Eggplants, 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, except lentil (dry), Subgroup of,**
- **Lentil (dry),**
- **Soya bean (dry),**
- **Root vegetables, except sugar beet, Subgroup of,**
- **Tuberous and corm vegetables, Subgroup of,**
- **Rye,**
- **Triticale,**
- **Wheat,**
- **Barley,**
- **Oats,**
- **Rice, husked,**
- **Millet,**
- **Sorghum Grain,**
- **Maize,**
- **Sweet corn (Corn-on-the-cob) (kernels plus cob with husk removed),**
- **Small seed oilseeds, Subgroup of,**
- **Sunflower seeds, Subgroup of,**
- **Cottonseed, Subgroup of,**
- **Peanut,**
- **Coffee bean.**

The EU notes that an assessment strategy for triazole derivatives metabolites (TDMs) is applicable in the EU. Residue definitions for risk assessment and toxicological reference values have been revised. The EU notes that an assessment for TDMs has not been carried out for mefentrifluconazole.

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

- **Pome fruits except persimmon, Japanese, Group of,**
- **Tree nuts, Group of,**
- **Sugar cane,**
- **Milks,**
- **Meat (from mammals other than marine mammals),**
- **Edible offal (mammalian),**
- **Mammalian fats (except milk fats),**

- Eggs,
- Poultry, edible offal,
- Poultry, fats,
- Poultry, meat.

For **pears**, an acute consumer risk has been identified for European consumers.

Pistachios should be excluded from the tree nut group as the good agricultural practice is different from other tree nuts and the number of residue trials used to derive the MRL is insufficient, according to the Information Document on the Application of the Guidance to Facilitate the Establishment of MRLs for Pesticides for Minor Crops (referred to in Annex D to the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues, Codex Procedural Manual).

For **sugar cane**, no analytical method is available. The reservation could be lifted, once the JMPR evaluation could be checked concerning this item.

For **animal commodities**, the EU residue definition is not compatible with JMPR's

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

- Leafy greens, Subgroup of,
- Leaves of Brassicaceae, Subgroup of.

Short-term exposure exceedances of the ARfD were indicated by JMPR for several crops of leafy greens and leaves of brassica, subgroup of.

Tetraniliprole (324)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities based on the lack of available toxicological data at EU level:

- Cabbages, head,
- Cherries, subgroup of,
- Edible offal (mammalian),
- Eggs,
- Flowerhead Brassicas, subgroup of,
- Fruiting vegetables, other than Cucurbits, Group of, excluding okra, martynia and roselle,
- Leaves of Brassicaceae, Subgroup of,
- Lemons and Limes (including Citron), Subgroup of,
- Maize cereals, Subgroup of,
- Mammalian fats,
- Mandarins (including Mandarin-like hybrids), Subgroup of,

- **Meat from mammals other than marine mammals,**
- **Milks,**
- **Oranges, Sweet, Sour (including Orange-like hybrids), Subgroup of,**
- **Peaches (including Nectarines and Apricots), Subgroup of,**
- **Plums, Subgroup of,**
- **Pome fruits, Group of, excluding Japanese persimmon,**
- **Poultry, edible offal,**
- **Poultry fat,**
- **Poultry meat,**
- **Pummelos and Grapefruits (including Shaddock-like hybrids, among others grapefruit), Subgroup of,**
- **Rice, husked,**
- **Small fruit vine climbing, Subgroup of,**
- **Soya bean (dry),**
- **Sweet Corn (corn-on-the-cob),**
- **Tree nuts, Group of,**
- **Tuberous and corm vegetables, Subgroup of,**
- **Peppers, Chili, dried.**

Based on the JMPR monograph for CCPR 2021, the EU will perform a more detailed assessment of the compound and based on the outcome, this reservation could be revised.

In addition, the EU notes that for **mandarins (including Mandarin-like hybrids), Subgroup of**, the proposed Codex MRL is not acceptable because the number of residue trials is insufficient according to the Information Document on the Application of the Guidance to Facilitate the Establishment of MRLs for Pesticides for Minor Crops (referred to in Annex D to the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues, Codex Procedural Manual).

For **poultry, edible offal, poultry fat, and poultry meat**, the proposed residue definition for enforcement is not acceptable as it does not include tetraniliprole-despyridyl-N-methyl-quinazolinone a major metabolite in eggs and fat that was also found in liver and muscle

For **tree nuts, Group of**, the OECD MRL calculator derives a lower MRL of 0.02 mg/kg.

Benzpyrimoxan (325)

Broflanilide (326) R/T

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities based on the lack of available toxicological data at EU level and pending the outcome of the review by the EU of the JMPR evaluation, once available:

- **Cabbages, Head,**
- **Chinese cabbage, (type Pe-tsai),**
- **Coffee bean, green,**
- **Edible offal (mammalian),**
- **Eggs,**
- **Cereal grains, Group of (except rice),**
- **Mammalian fats,**
- **Meat (from mammals other than marine mammals),**
- **Milks,**
- **Radish, Japanese,**
- **Poultry edible offal,**
- **Poultry meat,**
- **Poultry fats,**
- **Tuberous and corm vegetables, Subgroup of.**

Based on the outcome of the JMPR evaluation revision, this reservation could be revised.

Fluazaindolizine (327)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities based on the lack of available toxicological data at EU level:

- **Cucumbers and summer squashes, Subgroup of,**
- **Melons, pumpkins and winter squashes, Subgroup of,**
- **Tomato, Subgroup of,**
- **Eggplant, Subgroup of ,**
- **Peppers, Subgroup of (except martynia, okra, roselle),**
- **Carrot,**
- **Tuberous and corm vegetables, Subgroup of,**
- **Strawberries,**
- **Brassica vegetables, Group of (except Brassica leafy vegetables),**
- **Leafy vegetables, Group of (including Brassica leafy vegetables),**
- **Legume vegetables, Group of,**
- **Pulses, Group of,**
- **Root vegetables, Group of (except Carrot),**
- **Stalk and stem vegetables, Group of,**
- **Bulb vegetables, Group of,**
- **Cereal grains, Group of,**

- Oilseeds and oilfruits, Group of,
- Edible offal (Mammalian),
- Mammalian fats (except milk fats),
- Meat (from mammals other than marine mammals),
- Milks,
- Poultry, Edible offal of,
- Poultry fats,
- Poultry meat.

Once the JMPR evaluation would be available, the EU will perform a more detailed assessment of the compound and based on the outcome, this reservation could be revised.

In addition, for **melons, pumpkins and winter squashes, Subgroup of** the EU notes that the OECD MRL calculator derives a lower MRL.

The EU **notes** that JMPR derived a Codex MRL for several **rotational crops** without providing information on the residues in soil and its degradation. Moreover, for **processed products** the information available is not sufficient to assess whether the non-standard approach used to derive the processing factors is appropriate.

Fluindapyr (328) R/T

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities, based on missing toxicological data at EU level and pending the outcome of the review by the EU of the JMPR evaluation, once available:

- Maize cereals, Subgroup of,
- Sorghum Grain and Millet, Subgroup of,
- Sweet corn (corn-on-the cob) (kernels plus cob with husk removed),
- Tree nuts, Group of,
- Wheat, similar grains, and pseudo cereals without husks, Subgroup of.

Based on the outcome of this review, this reservation could be revised.

Additionally, the EU notes that no suitable analytical method exists to measure fluindapyr in animal commodities. Therefore, no CXLs for animal commodities are proposed, although CXLs for feed items are proposed.

Inpyrfluxam (329)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities based on the lack of available toxicological data at EU level:

- Apples,
- Soya beans,
- Sugar beet,
- Husked rice,
- Maize grain,
- Sweet corn,
- Peanut,
- Meat from mammals other than marine mammals,
- Mammalian fats,
- Edible offal (mammalian),
- Milk,
- Poultry meat,
- Poultry fat,
- Poultry edible Offal,
- Eggs.

Once the JMPR evaluation would be available, the EU will perform a more detailed assessment of the compound and based on the outcome, this reservation could be revised

Isoflucypram (330) R/T