European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

52nd Session

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Agenda Items 5(b) and 6

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

European Union Competence

European Union Vote

These comments replace those contained in CX PR 21 52 5-Add1. The changes concern in particular the following substances: thiabendazole, afidopyropen and penthiopyrad.
General comment The EU would like to **comment** that the MRLs and also the currently taken positions for thiabendazole, tebuconazole and metconazole might be revised in future, pending an evaluation of triazole derivative metabolites in the EU. An assessment strategy for triazole derivative metabolites has recently been adopted in the EU and is applicable since September 2019. Toxicological reference values have been endorsed for these metabolites.
Items 5(b)
Buprofezin (173) [See item 6.]
Diflubenzuron (130) The EU identified a concern about a plant metabolite of diflubenzuron, 4-chloroaniline. The EU takes note of the assessment recently conducted by JECFA.
Fluxapyroxad (256) [See item 6.]
Iprodione (111) The EU identified a concern about the safety of iprodione residues. The EU thanks JMPR for their review of the EU's concern and supports JMPR's strong recommendation that iprodione be prioritized for periodic re-evaluation.

Isofetamid (290)

[See item 6.]

Picoxystrobin (258)

[See item 6.]

Propiconazole (160)

[See item 6.]

Pyraclostrobin (210)

[See item 6.]

Request from CCPR concerning okra

Other substances from EFSA mandate

Items 6

Dimethoate (027)

The EU **supports the proposed withdrawal** of all existing Codex MRLs for dimethoate. The EU shares JMPR's concern on the genotoxicity of the metabolite omethoate. Furthermore, a recent EU assessment identified additional concerns on the genotoxic potential of dimethoate.

Omethoate (055)

The EU **supports the proposed withdrawal** of all existing Codex MRLs for omethoate. The EU shares JMPR's concern on the genotoxicity of omethoate.

Thiabendazole (065)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:
-Beans with pods
-Dry beans, subgroup of
-Dry peas, subgroup of
-Mango
-Peas with pods, subgroup of
-Succulent beans without pods, subgroup of
-Succulent peas without pods, Subgroup of
-Sweet potato

The EU **notes** that for beans with pods, the description of the commodity related to the code VP 2060 should be corrected (to include the suffix '(includes all commodities in this subgroup').

Carbendazim (072)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities, pending the outcome of an ongoing evaluation of benomyl, carbendazim and thiophanate-methyl in the EU:

- Spices, seeds, Subgroup of

Moreover, the EU invites clarification of the status of benomyl, carbendazim and thiophanate-methyl, as outlined in the concern form submitted by the EU.

Chlorothalonil (081)

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

-Cranberry
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 SDS-3701 (R182281), even an indicative consumer risk assessment using preliminary residue definitions could not be conducted.

Cypermethrin (including alpha and zeta-cypermethrin) (118) R/T

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:

- Ginseng, dried including red ginseng

S-Methoprene (147)

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

-Peanut, whole
A chronic risk for European consumers could not be excluded. Considering the significant background exposure from the existing EU MRLs, there is no scope to raise the MRLs. Further refinements of the chronic exposure calculation are possible; however the relevant data have not yet been assessed in the EU.

Studies investigating the metabolic behaviour after post-harvest treatment and on the nature and magnitude of residues in processed products are lacking.

Glyphosate (158)

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:

- Dry beans, Subgroup of (except soya beans)
- Dry peas, Subgroup of

Propiconazole (160)

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

-Peach

Following a recent EU evaluation, the active substance was not approved in the EU. In that framework, the consumer risk assessment could not be finalised due to data gaps, and no conclusion could be drawn on the genotoxicity and the general toxicity of several metabolites.

Specifically on peaches, an acute consumer risk has been identified for European consumers. Moreover, 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).

Buprofezin (173)

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

-Group of tree nuts
-Mammalian fats except milk fats
-Eggs
-Poultry, edible offal of
-Poultry fats
-Poultry meat

The EU identified a concern about the potential for the formation of aniline from residues of buprofezin in commodities which are subject to processing. The EU thanks JMPR for their review of the EU's concern and notes that JMPR took into consideration new data including a new in vivo genotoxicity study on aniline not yet assessed in the EU.

The EU notes that JMPR derived a Codex MRL proposal for crude olive oil, although no MRL proposal is made for unprocessed olives for oil production (SO 0305). It is the EU's understanding that a Codex MRL for the corresponding raw agricultural commodity needs to be established before a Codex MRL for a processed product can be set. However, the concern about the potential for the formation of aniline from residues of buprofezin would still apply.

Bifenthrin (178) R

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

-Strawberry

JMPR concluded that the estimated acute dietary exposure to residues of bifenthrin for the consumption of strawberries may present a public health concern.

The EU **notes** that:

For strawberries, also the CXL of 1 mg/kg, adopted in 1995, may pose a public health concern. Therefore, the EU considers that the existing CXL for strawberries should be revoked.

For celery and lettuce the proposed MRLs were retained at step 4 by 2016 CCPR under the four-year rule. As no additional data has been submitted, the EU considers that the proposed draft MRLs for celery and lettuce should be withdrawn.

Clethodim (187)

The EU **supports the proposed withdrawal** of all existing Codex MRLs for clethodim.

The EU notes that JMPR could not reach a conclusion on the definition of the residue for dietary risk assessment for plant and animal commodities. In addition, the EU was not able to conclude the toxicological assessment of clethodim since no toxicological reference values were derived from the metabolite 3-chloroallyl alcohol.

Tebuconazole (189)

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:

-Oranges, Sweet, Sour, subgroup of
-Mandarins (including Mandarin-like hybrids) Subgroup of

Tolclofos-methyl (191)

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

- Leafy greens except spinach, purslane and chard
- Edible offal (Mammalian)
- Eggs
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Milks
- Poultry fats
- Poultry meat
- Poultry, Edible offal of

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

- Potatoes
An acute consumer risk has been identified for European consumers. The EU has set an acute reference dose, based on a 9-month mouse study and an uncertainty factor of 100.

Kresoxim-methyl (199)

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

-Pome fruit (except Persimmon, Japanese)

Pyriproxyfen (200) R

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

-Mango

Cyprodinil (207)

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

- Soya bean (dry)

The EU **notes** that the approach taken by JMPR is not in line with point 4 of Annex C to the Risk Analysis Principles Applied by the Codex Committee on Pesticide Residues (Codex Alimentarius Commission, Procedural Manual). The proportionality approach was applied despite deviation from the cGAP by more than one parameter.

Pyraclostrobin (210) (R/T)

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

-Spinach
-Root vegetables, Subgroup of (except sugar beet)

Boscalid (221)

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

-Cherries (subgroup)
-Mango
-Peaches (subgroup)
-Plums (subgroup)
-Tea

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

-Pome fruits (subgroup)
The OECD MRL calculator derives a lower MRL of 1.5 mg/kg.

Azoxystrobin (229)

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

- Guava

Chlorantraniliprole (230)

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

- Dry beans (subgroup), except soya beans
- Dry peas (subgroup)
- Palm fruit (African oil palm)

The **EU notes** that in accordance with 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), palm fruit (oil) is a major crop. The EU considers that the setting of Codex MRLs in palm kernels and palm fruit should be further discussed.

Spirotetramat (234)

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

- Carrot
- Strawberry
- Sugar beet

Metaflumizone (236)

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

- Apple
- Coffee bean
- Lemons and limes (subgroup)
- Maize
- Melons, except watermelon
- Oranges sweet, sour subgroup of
- Soya bean (dry)
- Sugar cane
- Edible offal (mammalian)
- Eggs
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Milks
- Poultry, edible offal
- Poultry fats
- Poultry meat

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

- Grape

For grape an acute consumer risk has been identified for European consumers. The EU has set an ARfD based on reduced body weight gain observed in a rat developmental study.

Dicamba (240)

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:

- Cotton seed
- Maize
- Soya beans

The EU **notes** that for **soya bean hulls** and **soya bean meal** the processing factor derived from the GAP in dicamba-tolerant soyabeans was used to propose draft MRLs, which reflect different uses in conventional crops.

Acetamiprid (246)

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

- Spices, seeds, Subgroup of

Penthiopyrad (253)

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

- Cane berries, Subgroup of
- Bush berries, Subgroup of
In the EU, a separate residue definition for risk assessment for the metabolite 1-methyl-3-trifluoromethyl-1H-pyrazole-4-carboxamide (PAM) applies due to the higher toxicity compared to the parent compound. Moreover, in the EU an additional metabolite (753-AOH) is included in the residue definition for risk assessment. Therefore, the residue definitions for risk assessment derived by the EU and JMPR are not comparable.

- Elderberries
An extrapolation from blueberries to elderberries is not foreseen in the Codex extrapolation rules. The EU understands that JMPR derived the proposed draft CXL for elderberries based on the scope of the underlying authorisation. However, the EU considers that the extrapolation from blueberries to elderberries and guilder rose should be discussed by the eWG on Classification to determine whether such extrapolation is appropriate.

Fluxapyroxad (256)

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

- Lemons and limes (including Citron), Subgroup of
- Mandarins, subgroup of
- Oranges, Sweet, Sour (including Orange-like hybrids), Subgroup of
- Pummelo and grapefruits (including Shaddock-like hybrids, among others Grapefruit), Subgroup of

The EU **notes** that the proposed extrapolation from lemons to mandarins is not in accordance with the agreed Codex extrapolations rules.

Picoxystrobin (258) R

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:

-Sorghum Grain
-Cottonseed
-Coffee bean
-Tea, Green, Black (black, fermented and dried)
-Edible offal (Mammalian)
-Mammalian fats (except milk fats)
-Meat (from mammals other than marine mammals)
-Milks

Benzovindiflupyr (261)

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

- Bulb onion, Subgroup of
- Sugar cane

Fluensulfone (265)

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

- Citrus fruit, Group of
- Pome fruit, Group of (except Persimmon, Japanese)
- Stone fruit, Group of
- Small fruit vine climbing, Subgroup of
- Sugar cane
- Tree nuts, Group of
- Coffee bean
- Wheat, similar grains, and pseudo cereals without husks, Subgroup of
- Barley, similar grains, and pseudo cereals with husks, Subgroup of
- Maize cereals, Subgroup of
- Sweet corns, Subgroup of
- Rice cereals, Subgroup of
- Sorghum grain and millet, Subgroup of

The metabolism studies are not representative for the residue behaviour observed in the residue trials. In addition, the EU is of the opinion that the genotoxic potential of MeS cannot be excluded and that further genotoxicity tests would be needed to follow up on the positive results in vitro.

Tolfenpyrad (269)

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities, pending the outcome of ongoing import tolerance requests in the EU:
- Lemons and limes, Subgroup of
- Mandarins, Subgroup of
- Oranges, sweet, sour, subgroup of
- Pummelo and grapefruits, subgroup of
- Peppers, Subgroup of (except okra, martynia, and roselle)
- Milks
- Mammalian fats except milk fats
- Meat (from mammals other than marine mammals)
- Edible offal (mammalian)
- Eggs
- Poultry, edible offal of
- Poultry fats
- Poultry meat

For mandarins, oranges and peppers, based on the toxicological reference values derived by JMPR, an acute consumer risk has been identified for European consumers.

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

- Tomatoes, Subgroup of
- Eggplants, Subgroup of

JMPR concluded that the estimated acute dietary exposure to residues of tolfenpyrad for the consumption of tomatoes and eggplants may present a public health concern.

Mesotrione (277)

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

- Citrus fruit, Group of
- Pome fruits, group of
- Stone fruits, Group of
- Tree nuts, Group of

Acetochlor (280)

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

- Soya bean (dry)
- Edible offal (mammalian)

The enforcement residue definitions for plant and animal commodities in the EU differ from the definitions applied by JMPR.

Flonicamid (282)

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

- Lemons and Limes (subgroup)
- Oranges, Sweet, Sour (subgroup)
- Pumelo and grapefruit (including Shaddock-like hybrids) (subgroup)

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

For oranges an acute consumer risk has been identified for European consumers. The EU has set an ARfD based on rabbit developmental study.

Fluazifop-p-butyl (283)

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

- Cane berries, Subgroup of
- Bush berries, Subgroup of

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

- Elderberries
An extrapolation from blueberries to elderberries is not foreseen in the Codex extrapolation rules. The EU understands that JMPR derived the proposed draft CXL for elderberries based on the scope of the underlying authorisation. However, the EU considers that the extrapolation from blueberries to elderberries and guilder rose should be discussed by the eWG on Classification to determine whether such extrapolation is appropriate.

- Strawberry
An acute consumer risk has been identified for European consumers.
Moreover, a chronic consumer risk has been identified for European consumers, with strawberries as the main contributor among the crops under consideration.

Flupyradifurone (285)

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

- Cocoa beans
- Coffee beans
- Avocado
- Cane berries
- Hops (dry)

Isofetamid (290)

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

- Bush berries, subgroup of
- Dry beans (except soya beans), subgroup of
- Dry peas, Subgroup of

Pendimethalin (292)

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

- Cane berries (subgroup)
- Bush berries (subgroup)
- Mints
- Strawberries

Cyclaniliprole (296)

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

- Almonds
- Bush berries, Subgroup of
- Cane berries, Subgroup of
- Cherries, Subgroup of
- Cabbages, head
- Citrus fruit, Group of
- Cucumbers and summer squashes, Subgroup of
- Eggplants, Subgroup of
- Eggs
- Flowerhead Brassicas, Subgroup of
- Grapes
-Leaves of Brassicaceae, Subgroup of,
-Low growing berries, Subgroup of (except cranberries)
- Melons, pumpkins and winter squashes, Subgroup of
- Peppers, Subgroup of (except Martynia, Okra and Roselle)
- Peaches (including Apricots and Nectarines), Subgroup of
- Plums, Subgroup of
- Pome fruits, Group of (excluding Japanese persimmons)
- Tea, green, black (black, fermented and dried)
- Tomatoes, Subgroup of
- Tuberous and corn vegetables, Subgroup of

In a recent EU evaluation, the consumer risk assessment could not be finalised due to data gaps, and no conclusion could be drawn on the genotoxicity and the general toxicity of several metabolites.

The EU notes that for the subgroup of leaves of Brassicaceae, the proposed Codex MRLs are not acceptable because the number of residue trials is insufficient.

Fenazaquin (297)

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

- Tree nuts, Group of (except coconut)
- Edible offal
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Milks
- Milk fats

Fosetyl-Al (302)

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

- Blackberries
- Kiwifruit
- Pineapple
- Head Brassicas (sub-group)
- Flowerhead Brassicas (sub- group)
- Kale
- Mammalian fat (except milk fats)
- Poultry meat
- Poultry, Edible offal of
- Poultry fat
- Eggs
- Edible offal (mammalian)
- Meat (from mammals other than marine mammals)

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

- Coffee beans

In accordance with 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) , coffee beans are a major crop. Therefore, the number of residue trials submitted is insufficient.

Mandestrobin (307)

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

- Grapes
- Mammalian fats (except milk fats)
- Milks
- Meat (from mammals other than marine mammals)
- Edible offal (mammalian)
- Eggs
- Poultry fats
- Poultry meat
- Poultry, edible offal of
- Strawberry

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

- Rape seed
In the EU, a different residue definition for risk assessment applies, which includes also the metabolites De-Xy-S-2200, 4-OH-S-2200 conjugate, and 2-CH2OH-S-2200 conjugate. A conversion factor to recalculate residues according to the residue definition for monitoring to the EU residue definition for risk assessment is not available for rape seed.

Pydiflumetofen (309)

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

- Barley, similar grains, and pseudocereals with husks, Subgroup of
- Brassica vegetables (except Brassica leafy vegetables), Group of
- Cotton seed
- Dry beans, Subgroup of
- Dry peas, Subgroup of
- Edible offal (Mammalian)
- Eggs
- Fruiting vegetables, Cucurbits, Group of
- Fruiting vegetables, other than Cucurbits, Group of (except Martynia, Okra and Roselle)
- Leaves of Brassicaceae, Subgroup of
- Leaves of root and tuber vegetables, Subgroup of (except leaves of tuber vegetables)
- Legume vegetables, Group of
- Maize cereals, Subgroup of
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Milks
- Okra
- Peanut
- Poultry, Edible offal of
- Poultry fats
- Poultry meat
- Rice cereals, Subgroup of
- Root vegetables, Subgroup of
- Small seed oilseeds, Subgroup of
- Sorghum Grain and Millet, Subgroup of
- Stems and petioles, Subgroup of
- Sunflower seeds, Subgroup of
- Sweet Corns, Subgroup of
- Tuberous and corm vegetables, Subgroup of
- Wheat, similar grains, and pseudocereals without husks, Subgroup of

The EU notes that for the subgroup of stems and petioles an acute consumer risk has been identified for European consumers.

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

- Leafy greens, Subgroup of
JMPR concluded that the estimated acute dietary exposure to residues of pydiflumetofen for the consumption of leafy greens may present a public health concern. An acute consumer risk has been identified for European consumers.

Pyriofenone (310)

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

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

Afidopyropen (312)

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

- Cabbages, Head
- Cherries, Subgroup of
- Citrus Fruit, Group of
- Coriander, leaves
- Cotton seed
- Cucumber
- Dill, leaves
- Edible offal (mammalian)
- Eggs
- Eggplants, Subgroup of
- Flowerhead Brassicas, Subgroup of
- Fruiting vegetables, Cucurbits – Melon, Pumpkins and Winter squashes, Subgroup of
- Ginger, rhizome (fresh)
- Leafy greens, Subgroup of
- Leaves of Brassicaceae, Subgroup of
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Milks
- Parsley, leaves
- Peaches, Subgroup of
- Peppers, Subgroup of, excluding okra, martynia and roselle
- Pome fruit, Group of, excluding persimmon
- Plums, Subgroup of
- Poultry, edible offal of
- Poultry, fats
- Poultry, meat
- Soya bean (dry)
- Stem and Petioles, Subgroup of
- Summer squash
- Tomatoes, Subgroup of
- Tree nuts, Group of
- Tuberous and corm vegetables, Subgroup of
- Turmeric, root (fresh)

The JMPR Report does not provide sufficient evidence demonstrating that metabolite M017 is covered by the toxicological reference values derived for the parent compound. Moreover, afidopyropen contains two cyclopropane carboxylic acid (CPCA) groups. Including CPCA in the residue definition for risk assessment may lead to ambiguous results, since livestock and rat metabolism studies show that metabolism can lead to the cleavage of only one or both CPCA ester moieties.

The EU notes that:

For leaves of Brassicaceae, based on the toxicological reference values derived by JMPR, an acute consumer risk has been identified for European consumers.

For coriander, dill and parsley leaves, JMPR considered mustard greens to be more representative for herbs than leaf lettuce or spinach. However, the agreed extrapolations rules (Appendix VIII of REP18/PR) specify that trials on basil, mint, leaf lettuce or spinach should be used to derive an MRL for herbs. By considering the residue trials in leaf lettuce and spinach, a lower MRL proposal of 2 mg/kg is derived.

Metconazole (313)

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
- Blueberries
- Beans with pods (Phaseolus spp.) immature pods and succulent seeds)
- Cotton seed
- Edible offal (mammalian)
- Eggs
- Garlic
- Tree nuts, Group of
- Maize
- Mammalian fats (except milk fats)
- Meat (from mammals other than marine mammals)
- Milks
- Onion, bulb
- Peaches, Subgroup of
- Peanut
- Plums, Subgroup of
- Poultry, Edible offal of
- Poultry fats
- Poultry meat
- Rape seed
- Cherries, Subgroup of
- Subgroup of dry beans except soya beans
- Dry peas, Subgroup of
- Sunflower seeds, Subgroup of
- Tuberous and corm vegetables, Subgroup of
- Sugar beet
- Soya bean (dry)
- Sugar cane
- Sweet corn (Corn-on–the-cob)

The EU **notes**:
For **peaches**, an MRL of 0.15 mg/kg is sufficient according to the OECD calculator.
For **sweet corn (corn-on-the-cob)**, the asterisk should be deleted, as an MRL of 0.015 mg/kg is derived with the OECD calculator.
For **plums**, subgroup of, the number of residue trials submitted is insufficient. In accordance with 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), plums are a major crop.
For **cherries, sunflower and sugar beet**, fewer residue trials have been submitted to JMPR than to the EU for import tolerance requests for the same commodities. The EU considers that JMPR should base its recommendations on the most comprehensive dataset possible, and that submission of a reduced dataset, intentionally or unintentionally, is not acceptable. The EU calls on all sponsors to ensure that all available studies are submitted to JMPR.

Pyflubumide (314) R/T

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

-Apple

-Tea, Green, Black (black, fermented and dried)

JMPR concluded that the estimated acute dietary exposure to residues of pyflubumide for the consumption of apple and tea may present a public health concern.

The EU **notes** that the use in apples would trigger a dietary burden calculation for livestock and an assessment of residues in animal products, which were not reported in the JMPR report.

Pyridate (315) T

The EU notes differences in the toxicological reference values derived from JMPR. Studies selected as point of departure (multi-generation study and developmental rat toxicity study) and application of UF (applied because of the severity of effect) would lead to lower TRV.
The EU agrees with the information provided by JMPR considering that toxicity of the metabolites pyridafol CL 9673-N-glucoside (pyridafol-N-glucoside) and pyridafol-O-methyl (CL 9869) could be covered by parent compound.

Pyrifluquinazon (316) R/T

The EU supports the JMPR approach not to derive residue definitions for risk assessment pending clarification on the toxicological relevance of metabolites.

Triflumuron (317)

Valifenalate (318) R/T

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

-Eggplants
-Grapes
-Onion, bulb
-Shallot
-Tomato
-Edible offal (mammalian)
-Eggs
-Milks
-Meat (from mammals other than marine mammals)
-Mammalian fats (except milk fats)
-Poultry edible offal
-Poultry fat
-Poultry meat