

European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

50<sup>th</sup> Session

Haikou, 9 – 14 April 2018

**AGENDA ITEMS 3 AND 4 a)**

**Item 3: Matters referred to the Committee by the Codex Alimentarius Commission and other Subsidiary Bodies (CX/PR 18/50/2)**

**Item 4a: Matters of interest arising from FAO and WHO in addition to the 2017 JMPR activities (CX/PR 18/50/3)**

*Mixed Competence*

*European Union Vote*

The European Union and its Member States (EUMS) would like to provide the following comments on items 3 and 4a of the agenda:

**Agenda item 3: Matters referred to the Committee by the Codex Alimentarius Commission and other Subsidiary Bodies (CX/PR 18/50/2)**

CCPR and CCRVDF

The EUMS welcome the proposal to explore ways for a better collaboration between the two Committees, CCPR and CCRVDF, in particular with a view to the parallel efforts made to also harmonise the procedures between JMPR and JECFA as regards exposure assessment of dual use substances.

**Agenda item 4 (a): Matters of Interest Arising from FAO and WHO in Addition to the 2017 JMPR Activities (CX/PR 18/50/3)**

1. Improvement of chronic dietary exposure assessment

The EU MS very much welcome the joint activity of JECFA and JMPR to establish a joint working group and to develop dietary exposure approaches for dual use substances (veterinary and agricultural use). This will lead to much more consistency and facilitate the setting of one single CXL per substance considered as safe. Such approach will help overcome the current difficulties for national enforcement authorities when residues of a dual use substance are found but two different CXLs exist, one set by CCPR and one by CCRVDF.

It is noted that currently different approaches to derive residue definitions are used, i. e. "Total-Residue Concept" vs "Residue Definition for Dietary Risk Assessment", which makes it difficult to compare the results of exposure assessments. Therefore, we encourage the expert working group to further elaborate on harmonization of residue definitions between veterinary drugs and pesticides (to the extent possible).

Further harmonisation of exposure assessment, including combined exposure assessment for active substances used in plant protection and veterinary medicine, is also welcomed. In principle, JECFA and JMPR using different models having included different assumptions in their exposure assessments. Likewise, consumption figures and consumer groups should be harmonised between both areas as a pre-requisite for a meaningful outcome of dual use exposure.

It is proposed to start with developing common models. In addition, "Less-than-Lifetime" assessments are useful since some vulnerable sub-populations or certain toxicological relevant time slots are not always sufficiently covered by current chronic exposure assessments.

The EU MS also support to investigate summing up residue concentrations obtained from veterinary use and pesticide use in the same animal commodity. The aim should be to provide the residue data input for the dietary exposure assessment in the immediate future. As this is a rather conservative approach for long-term dietary intake estimates a probabilistic approach should also be considered, based on monitoring data reflecting the actual exposure levels.

## 2. Acute probabilistic dietary exposure assessment for pesticides

The EUMS fully support the scheduled exercises in the area of acute dietary exposure assessment, the results of which will provide valuable input for the discussion on the further review of the IESTI equation.

## 3. Global Food Consumption Database and ongoing activities to support countries to generate and to use data for risk analysis purposes

The EUMS strongly support these activities as every effort should be made to collect the most reliable consumption data in order to improve the assessment of dietary exposure to chemical substances in food.