



Pesticide Residues – Regulation 396/2005 – upcoming issues

Advisory group on the food chain and
animal and plant health plenary
November 2019

Chlorpyrifos and chlorpyrifos-methyl

- EFSA confirmed serious concerns for human health: developmental neurotoxicity in children and potential genotoxicity (EFSA statements, 2 August 2019).
- Not possible to set safe levels of exposure – including for residues in food.
- COM intends to non-renew the approval of the two active substances and lower all MRLs to 0.01 mg/kg.

- Non-renewal of chlorpyrifos and chlorpyrifos-methyl scheduled on 6 December 2019.
- MRL measure under preparation – to be notified to WTO.
- Due to health concerns – shorter deferred application and no transitional measures.
- New MRLs expected to become applicable in Q4-2020.
- Food business operators and third countries encouraged to already prepare to meet the new requirements.

Chlorpropham

- Non-renewal of approval - Regulation (EU) 2019/989 - Maximum grace period set on 8 October 2020.
- ARfD exceeded by 797% for chlorpropham and 2360% for 3-chloroaniline – representative use on potatoes.
- COM intends to lower the existing MRL for potatoes once the grace period has expired.
- COM submitted a concern form to CCPR to withdraw the existing Codex Limit set at 30 mg/kg.

Temporary MRL for potatoes

- Potato trade organisations and manufacturers of CIPC informed on cross-contamination from storage facilities.
- Potato industry submitted an application for the setting of a temporary MRL - Article 16(1)(a) of Regulation 396/2005.
- NL (RMS) evaluated and proposed values ranging from 0,3 to 0,5 mg/kg depending on scenario and methodology.
- EFSA is assessing whether the MRL proposals are safe to consumers - Reasoned Opinion by January 2020.

Key messages to potato industry

- COM does not recommend treating crops until the very end of the grace period to avoid MRL non-compliance.
- Potato sector to apply stringent cleaning practices to prevent cross-contamination.
- Potato sector to develop a study to estimate the decline of residue levels over time.

Dimethoate

- Non-renewal of approval - Regulation (EU) 2019/1090.
- EFSA identified concerns: 1) Dimethoate – potential genotoxic; 2) Omethoate (main metabolite) – confirmed mutagenic.
- Maximum grace period set on 17 October 2019 for cherries and 17 July 2020 for all other products.
- COM notified to WTO MRL measure lowering MRLs for cherries and will prepare a second one for the remaining commodities.
- COM does not recommend treating crops until the end of the grace period and encourages FBOs to prepare for new requirements.