23.02.2021

European Union comments

Circular Letter CL 2021/07-PR

Request for comments on the establishment of the schedules and priority lists of pesticides for evaluation / re-evaluation by the joint FAO/WHO expert meetings on pesticide residues (JMPR)

Mixed competence

European Union Vote

The European Union and its Member States (EUMS) thank the Electronic Working Group (eWG) on Priorities chaired by Australia for the preparation of CL 2020/07-PR and its appendices, as well as the work done to incorporate the requests from members and sponsors.

Paragraph 7

The EUMS note that at present only four substances (and the reserve compound) are supported for periodic review in 2022. Two substances (chlorpyrifos, fenthion) are not supported by the manufacturer or any other interested party. Moreover, for one of the supported substances (carbendazim) and the reserve compound, it is not clear whether an evaluation could take place, based on the comments in Column E on commodities.

The EUMS consider that additional substances should be included in the periodic review schedule: for evaluation in 2022, to ensure progress on the backlog of periodic re-evaluations; and with a reserve status, so that reserve substances are readily available in case of problems with substances scheduled for periodic reviews in a given year, and replacements can be made like-for like (new compound for new compound, periodic review for periodic review), or periodic review for new compound only if no reserve new compounds are available. This seems even more opportune in view of the new compound schedule for 2022, where so far national registrations have been confirmed for only four out of eight scheduled substances.

The EUMS acknowledge that the periodic re-evaluation for dithiocarbamates will likely be more complex than other evaluations, due to the different active substances contributing to dithiocarbamate residues.

Paragraph 13

The EUMS note a growing number of substances that will meet the 15-year rule and in addition those, which will meet the 25-year rule at the Table 3.

The EUMS note that the substance flumethrin (195), which was previously evaluated in 1996, is missing in Table 2B and propose to insert it.

Paragraph 14

The EUMS are pleased to see that the re-evaluation of chlorpyrifos is scheduled for 2022. The EUMS note that the substances propiconazole, chlorothalonil, chlorpyriphos-methyl and chlorpropham, for which a public health concern have been lodged, have not been added to Table 2A. In addition, the substances propiconazole, chlorpyriphos-methyl and chlorpropham meet the 15-year rule. Therefore, the EUMS propose to transfer propiconazole, chlorothalonil, chlorpyriphos-methyl and chlorpropham to Table 2A.

Paragraph 15

The EUMS are in favour of deleting compounds from the CCPR pesticides list that are no longer supported by a manufacturer and for which a public health concern has been identified. The withdrawal of the corresponding CXLs will reduce the number of substances for which a periodic review is needed. Therefore, Amitraz PHC (122), Bromopropylate PHC (070), Fenarimol PHC (192), Dichloran PHC (083), Bromide ion (047) and Fenbutatin oxide should be removed from the CCPR pesticides list.

Table 5 includes active substances that meet the 25-year rule for outdated toxicology. It is proposed to put them on the schedule for the 2022 periodic review, as has been done for fenthion.

The EUMS would like to refer to their comment to Circular Letter CL 2020/05 PR (rev) from 30 June 2020, paragraph 13:

“As previously stated, the EUMS consider that maintaining CXLs that are not supported by submission of toxicology, residue and other relevant data, and also do not have a corresponding registration listed in the National Registration Database, violates the requirements laid down in the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues. The EUMS acknowledge the work on a discussion paper concerning the management of unsupported compounds. Nevertheless, the respective discussion should not undercut or counteract the aim to perform a periodic re-evaluation of active substances as required. An extension of the period in case an existing evaluation will be outdated, i.e. beyond 25 years, is not acceptable.”