

## European Union comments

### CODEX COMMITTEE ON PESTICIDE RESIDUES

52<sup>nd</sup> Session

(Virtual)

26– 31 July and 3 August 2021

#### AGENDA ITEM 15

### Establishment of Codex Schedules and Priority Lists of Pesticides for Evaluation / Re-Evaluation by JMPR

*Mixed competence*

*European Union Vote*

The European Union and its Member States (EUMS) would like to thank Australia for the preparation of the schedules and priority lists of pesticides as well as the work done to incorporate the requests from members and sponsors.

#### **B. FINALISING THE 2022 PROPOSED SCHEDULE**

##### **Paragraph 5 and 6**

The EUMS agree with the proposed schedule.

##### **Paragraph 7**

The EUMS support the seven compounds and one reserve compound that are listed for periodic review in 2022.

The EUMS acknowledges that efforts were made to increase the number of substances for the periodic review. However, this does not solve the general problem with a steady increasing backlog of substances for which the last review was done more than 25 years ago.

The EUMS regret that the re-evaluation for chlorpyrifos is deferred to 2023 as based on the information available from the European Food Safety Authority serious human health concerns have been identified and therefore public health concerns were submitted in 13 March 2020.

It is not clear whether an evaluation could take place for carbendazim, based on the comments in Column E on commodities in the respective Excel worksheet. The EUMS seek for clarification how to proceed with carbendazim, which toxicology is outdated as the last full toxicological evaluation was in 1995 with an evaluation for acute effects in 2005.

The EUMS acknowledges 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.

## **F. PUBLIC HEALTH CONCERNS**

### **Paragraph 13**

The EUMS note that the substances propiconazole, chlorothalonil and chlorpropham, for which a public health concern have been lodged, have not been added to Table 2A. In addition, the substances propiconazole and chlorpropham meet the 15-year rule. Therefore, the EUMS propose to transfer propiconazole, chlorothalonil and chlorpropham to Table 2A.

## **G. PERIODIC REVIEWS (UNSUPPORTED COMPOUNDS)**

### **Paragraph 14**

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, the EUMS support the removal of related CXLs from the CCPR pesticides list for amitraz PHC (122), bromopropylate PHC (070), fenarimol PHC (192), dicloran PHC (083), bromide ion (047) and fenbutatin oxide.

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 jeopardise 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.