

European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

46th Session

Nanjing, China, 5 – 10 May 2014

AGENDA ITEM 11

Discussion paper on guidance to facilitate the establishment of maximum residue limits for pesticides for minor crops / specialty crops

CX/PR 14/46/12

Mixed Competence.

European Union Vote.

The European Union and its Member States (EUMS) would like to provide the following comments on the Discussion paper on guidance to facilitate the establishment of maximum residue limits for pesticides for minor crops / specialty crops (CX/PR 14/46/12):

The EUMS appreciate the work done by the electronic Working Group (eWG) on Minor Uses and Specialty Crops, and would like to thank in particular the Chair France and the co-Chairs Kenya and Thailand as well as all the participants of the eWG for their work on this important topic.

The EUMS agree with the content of the Discussion Paper in general terms and support the conclusions and proposals for further work outlined in paragraphs 44 to 48.

The EUMS welcome the consideration given to the comments submitted to the electronic Working Group and the relevant modifications introduced in the Discussion Paper.

However, the EUMS see the need for further amendments to the Discussion Paper as outlined below:

- **Paragraph 61 :**

The text in brackets should be replaced by the following:

“(evaluated data confirmed consistently that crop production practices may have more impact on residue levels than geographic zones)”

This would provide a clear argument supporting the preceding reference to the OECD Revised Crop Field Trial Guidance.

- **Paragraph 65 :**

The EUMS do not consider it appropriate to allow for a more flexible approach of

combining the use of the proportionality principle with additional variations in GAP (e.g. number of application, PHI), given the limited practical experience with the proportionality principle. It is suggested to replace paragraphs 65 and 66 by the following:

“While it is recognised that due to different agronomical practices and different climates, trials from different regions of the world would not always be conducted according to the same GAP in term of number of application and PHI and more than one parameter may vary between them, the proportionality principle should not be employed with additional variations in GAP (e.g. number of application, PHI), given the limited practical experience with the proportionality principle. This is in line with the agreed "Principles and guidance for application of the proportionality concept for estimation of maximum residue limits for pesticides" stating that residue data from different geographical regions in combination with the proportionality principle can be used only on a case by case basis so that the overall uncertainty of the residue estimate is not increased (cf. REP13/PR - Appendix VIII, paragraph 4).”

- **Table Annex I :**

A separate row should be introduced for the subgroup 013 A Leafy greens, with a requirement for a minimum of 6 trials.

Alternatively, the comments for VL 0483 Lettuce, leaf, should be amended to read:

“Note that the Group 013A Leafy greens including spinach is considered as major in terms of global consumption, and a minimum of 6 trials are required for setting an MRL for the entire subgroup.”