

CODEX ALIMENTARIUS COMMISSION

42nd Session – 8-12 July 2019

European Union comments on

Codex Circular Letter CL 2019/43-PR :

Request for comments on MRLs for pesticides in food and feed at Step 5/8

European Union Competence

European Union Vote

General comment

The European Union (EU) supports the adoption of all the proposed draft MRLs in Appendix II of REP 19/PR with the exception of the draft MRLs for the substances/commodities below for which the EU requests that its **reservations** are included in the report of CAC 42.

The EU has a policy in place whereby EU MRLs will be aligned with Codex MRLs if three conditions are fulfilled: (1) that the EU sets MRLs for the commodity under consideration, (2) that the current EU MRL is lower than the CXL, and (3) that the CXL is acceptable to the EU with respect to areas such as consumer protection, supporting data, and extrapolations. Reservations address the cases where the EU considers the third criterion not to be met, with the aim of increasing transparency and predictability regarding the impact of the work of the Codex Alimentarius Commission on EU legislation.

Diquat (031)

Reservation of the EU on the advancement of the proposed MRLs for barley; chick-pea (dry); dry beans (subgroup); dry peas (subgroup); mammalian fats (except milk fats); poultry fats; rye; and triticale because of toxicological concerns on metabolites.

Imazalil (110)

Reservation of the EU on the advancement of the proposed MRLs for lemons and limes (subgroup); oranges, sweet, sour (subgroup); banana; potato; and edible offal (mammalian), pending the outcome of their ongoing evaluation of toxicological properties of several metabolites and because they had identified an acute consumer risk for potato.

Propamocarb (148)

Reservation of the EU on the advancement of the proposed MRLs for edible offal (mammalian); mammalian fats (except milk fats); meat from mammals (other than marine mammals) and milks due to the different residue definition for enforcement.

Propiconazole (160)

Reservation of the EU on the advancement of all the proposed MRLs since propiconazole had not been approved in the EU due to toxicological data gap for several metabolites.

Bentazone (172)

Reservation of the EU on the advancement of the proposed MRLs for dry beans, subgroup of; dry peas, subgroup of; edible offal (mammalian); mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks due to the different residue definition for plant and animal commodities for enforcement in the EU.

Abamectin (177)

Reservation of the EU on the advancement of the proposed MRLs for cane berries (subgroup), grapes, green onions (subgroup) and herbs (subgroup excluding mints) due to the different residue definition for enforcement in the EU.

Pyraclostrobin (210)

Reservation of the EU on the advancement of the proposed MRLs: for lettuce, head and pome fruits due to acute risk concern; for edible offal (mammalian); mammalian fats (except milk fats); meat (from mammals other than marine mammals) and milks since a feeding study should have been considered, and for tea, green, black (black, fermented and dried) due to insufficient number of residue trials.

Fludioxonil (211)

Reservation of the EU on the advancement of the proposed MRLs for celery; green onions (subgroup); leaves of Brassicaceae (subgroup); pineapple and pomegranate, pending the outcome of the ongoing periodic re-evaluation in the EU.

Fluopyram (243)

Reservation of the EU on the advancement of the proposed MRL for rice, husked, due to the ongoing MRL review in the EU and the insufficient number of processing studies.

Chlorfenapyr (254)

Reservation of the EU on the advancement of all the proposed MRLs for food commodities except peppers, chili, dried due to the different risk assessment approach regarding the use of

correction factors to estimate metabolite residue levels, and because of their acute intake concern for tea.

The EU requests clarification on the MRL for chlorfenapyr in fruiting vegetables, cucurbits at 0.3 mg/kg proposed for adoption at Step 5/8, which is missing from the JMPR 2018 Report and whether this proposed MRL should be adopted by CAC42 at all.

Cyazofamid (281)

Reservation of the EU on the advancement of the proposed MRL for green onions as the EU extrapolation policy supported an MRL of 2 mg/kg for the subgroup of green onions (subgroup except chives), and 6 mg/kg for chives only.

Oxathiapiprolin (291)

Reservation of the EU on the advancement of the proposed MRLs for all primary food commodities of plant origin pending the outcome of their ongoing evaluation of the toxicological properties of metabolite IN-WR791 and the advancement of the proposed MRLs for animal commodities because of their different livestock dietary burden estimation.

Ethiprole (304)

Reservation of the EU on the advancement of the proposed MRLs for coffee beans; edible offal (mammalian); eggs; mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks; poultry meat; poultry, edible offal of; poultry fats; and rice, husked due to the ongoing EU assessment of toxicological data.

Norflurazon (308)

Reservation of the EU on the advancement of the proposed MRLs for edible offal (mammalian); eggs; mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks; poultry fats; poultry meat; poultry, edible offal of, due to the overall poor quality of the toxicological studies, the lack of data on the genotoxic potential of metabolite (NOA-452075) and the lack of a reliable calculation of the livestock dietary burden.

Pydiflumetofen (309)

Reservation of the EU on the advancement of the proposed MRL for small fruit vine climbing, pending the outcome of the ongoing evaluation in the EU.

Tioxazafen (311)

Reservation of the EU on the advancement of the proposed MRLs for cotton seed; edible offal (mammalian); eggs; maize; mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks; poultry meat; poultry, edible offal of; poultry fats; and soya bean (dry) pending the outcome of the ongoing evaluation in the EU.

