

## European Union comments

### CODEX COMMITTEE ON PESTICIDE RESIDUES

#### Codex Circular Letter CL 2021/44-PR

#### Request for comments on the management of unsupported compounds without public health concern scheduled for periodic review

##### *European Union Competence*

##### *European Union Vote*

The European Union (EU) would like to thank the Electronic Working Group (eWG) on unsupported compounds without public health concerns scheduled for periodic review chaired by Chile and co-chaired by India and the United States of America for the preparation of the discussion paper on the management of unsupported compounds without public health concerns scheduled for periodic review with reference CX/PR 21/52/17.

##### **Generic comments:**

The EU, as already indicated in its comments on CX/PR 19/51/17 and CX/PR 20/52/17 continues to support option 3, which is fully in line with the risk analysis principles.

With regard to option 2b, the EU would like to refer to its comments on Circular Letter CL 2020/40 PR from 14 September 2020:

“The EU does not support option 2b and does not agree to an amendment of the Risk Analysis Principles regarding periodic reviews. It is not a problem of the Risk Analysis Principles, but of the practical implementation of those principles for certain substances. The EU considers that the preparation of a proposal for amendment for consideration by CCPR52 (2021) exceeds the terms of reference of the current eWG. It would also divert resources from pursuing more promising ways forward.”

##### **Specific Comments:**

##### **TOR(ii)**

The EU supports the collaboration activities suggested in the discussion paper for unsupported compounds.

Additionally, in this context, the EU would also welcome further discussions/reflections on how to support Codex Members, in particular developing countries, in moving gradually towards the use of lower risk substances. These discussions/reflections could take place within a future mandate of this or a new working group.

The EU notes that the eWG of unsupported compounds could be functioning permanently as proposed in paragraph 21 of Appendix I. The EU believes that the three eWGs on Unsupported Compounds, on the National Registration Database and on Priorities are closely interlinked. Therefore, the EU proposes merging the eWG on Unsupported Compounds with the one on the National Registration Database. The merged eWG could also be tasked to contribute to the eWG on Priorities by preparing suggestions for the substances to be included into the tables of the priority list. This division of responsibilities should be reflected in the mandate of a future joint eWG on unsupported compounds and on the National Registration Database.

#### **TOR(iv)**

The EU supports the additional practices suggested in the discussion paper.

As regards paragraph 49, the EU would like to refer to its comments on Circular Letter CL 2020/40 PR (rev) from 14 September 2020 on paragraph 27:

“The EU agrees with the proposal of the eWG, and suggests that the eWG recommends to explore whether the platform “forum.codex-alimentarius.net” could be used for this purpose.”