

**46th Session of the Codex Committee on Pesticide Residues
Nanjing, China, 5 – 10 May 2014**

European Union Comments

Agenda Item 6 a

Draft and proposed draft maximum residue limits for pesticides in foods and feeds at Steps 7 and 4
Comments at steps 6 and 3

(CX/PR 14/46/5 and CX/PR 14/46/5-Add. 1)

European Union Competence

European Union Vote

5.13 Diquat (031)(T,R)**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **banana;**
- **beans dry:**

noting that at EU level a higher MRL of 0.2 mg/kg is in place.

- **cashew nut;**
- **citrus fruits;**
- **coffee beans:**

the MRL proposal is acceptable, however the setting of the MRL at the level of the LOQ of the residue trials (0.05* instead of 0.02*) could be considered.

- edible offal (mammalian);
- eggs;
- fruiting vegetables other than cucurbits (except sweetcorn, fungi and mushrooms);
- meat (from mammals other than marine mammals);
- milks;
- pome fruits:

since azaroles are classified under 'other small fruit & berries' in the EU, the proposed draft MRL for pome fruit will however not be included in EU legislation for azaroles.

- poultry meat;
- poultry, edible offal of;
- rape seed;
- stone fruits;
- strawberry;
- sunflower seed.

The EU would like introduce a **reservation to the advancement** of the proposed draft MRL for the following commodities:

- **peas (dry):**

noting that a scaling factor of 1.3 should be applied because the application rate in all residue trials was underdosed by 25%.

- **potato:**

noting that according to the OECD calculator an MRL of 0.08 mg/kg could be proposed.

- **soya bean (dry).**

A chronic risk for European consumers could not be excluded. Considering the significant background exposure from the existing EU MRLs, there is no scope to raise the MRLs for peas (dry), potato and soya bean (dry).

5.26 Malathion (049)(R)

The EU would like to introduce a **reservation to the advancement of** the proposed draft MRL for the following commodity:

- cherries:

for cherries the proposed draft MRL is based on an overdosed GAP. The criteria for applying the proportionality approach are not completely fulfilled as the number of applications didn't match with the cGAP.

Furthermore the metabolites malaoxon, DMM, MMCA and MDCA are more toxic than the parent. More data on these metabolites are needed for an adequate consumer exposure assessment.

5.7 Chlorpyrifos-methyl (090)(R)

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- cereals, except maize and rice;

- rice, husked:

a chronic risk for European consumers could not be excluded. Considering the significant background exposure from the existing EU MRLs, there is no scope to raise the MRLs for cereals. Moreover, the extrapolation from barley and wheat to buckwheat, millet, sorghum and rice is not in line with EU extrapolation guidelines, and uncertainties were noted, as no information was available on residues of the metabolite DEM and a comprehensive estimation of the exposure of livestock to chlorpyrifos-methyl (and TCP) residues was not performed.

5.35 Triazophos (143)(R)

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- rice husked;

- rice polished:

for rice husked and rice polished an acute consumer risk has been identified in case the STMR refers to husked rice.

Furthermore information is required on whether residue trials were performed on paddy rice or husked rice. In the case they

were conducted on paddy rice a processing factor should have been applied. In case they were conducted on husked rice, the MRL should be recalculated, applying the processing factor only once instead of twice.

Residues in animal products resulting from the use of triazophos in rice and soya beans should be considered. The residue definition should be reconsidered since in rice grains an unidentified compound was observed at levels higher than the parent compound. Also the formation of degradation products during boiling should be assessed.

5.21 Glyphosate (158)(R)

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- rape seed:

a proposal made by EFSA for the same residue definition and the same Canadian GAP came to the conclusion that an MRL of 20 mg/kg is sufficient (see European Food Safety Authority, 2013. Reasoned Opinion on the import tolerance for glyphosate in genetically modified oilseed rape. EFSA Journal 2013; 11(11):3456, 30 pp. doi:10.2903/j.efsa.2013.3456).

Moreover, the same Reasoned Opinion highlights a lack of studies investigating the effect of processing on residues of glyphosate and its metabolite AMPA.

5.30 Propiconazole (160)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- peach;
- oranges, sweet, sour (including orange-like hybrids): several cultivars;
- tomato.

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- plums (including prunes):

the MRL proposal is based on a limited data set. It is therefore difficult to assess whether it is appropriate to combine data from two different post harvest application types (2 trials per application type only).

5.2 Bentazone (172)(R)

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- beans (dry);
- beans, except broad bean and soybeans (green pods and immature seeds);
- beans, shelled (succulent immature seeds);
- cereal grains;
- eggs;
- herbs;
- linseed;
- milks;
- onion, bulb;
- peanut;
- peas (pods and succulent = immature seeds);
- potato;
- poultry meat (fat);
- poultry, edible offal of;
- soya bean (dry);
- spring onion;
- sweet corn (con-on-the-cob):

the occurrence of the metabolites 6-hydroxy bentazone and 8-hydroxy bentazone (free and conjugated) was not adequately addressed. This is reflected in the divergent residue definitions agreed by JMPR and the EU, respectively.

5.14 Dithianon (180)(R)**

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- almonds;
- currants, black, red, white;
- edible offal (mammalian);
- eggs;
- meat (from mammals other than marine mammals);
- milks;
- pome fruits;
- poultry meat;
- poultry, edible offal of;
- table grapes;
- wine grapes:

a chronic risk for European consumers could not be excluded. Considering the significant background exposure from the existing EU MRLs, there is no scope to raise the MRLs.

- **hops, dry:**

the consumer risk assessment is affected by uncertainties which should be clearly addressed. The data presented in the JMPR report provided some indications that the expected exposure to these degradation products may exceed the toxicological threshold values (TTC approach). However, JMPR did not perform a detailed assessment.

- **stone fruits:**

it would be preferable to set individual MRLs for the different stone fruit crops instead of setting a group tolerance based on the most critical stone fruit commodity. Sufficient residue data were submitted to derive MRL proposals of 1.5 mg/kg in cherries, 3 mg/kg in peaches and, by extrapolation, apricots, and 0.8 mg/kg in plums.

5.17 Fenpyroximate (193)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- avocado;

- **cherries;**
- **common bean (pods and/ or immature seeds):**
noting that for common bean (pods and/or immature seeds) 1 trial is missing.
- **cucumber:**
noting that the HR is 0.17 mg/kg instead of 0.19 mg/kg.
- **milks;**
- **potato:**
noting that no metabolism studies are available for root and tuber vegetables.
- **strawberry.**

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **edible offal (mammalian);**
- **meat (from mammals other than marine mammals):**
the residue definition for commodities of animal origin should include the M-1 and M-3 metabolites.
- **stone fruits:**
the extrapolation is not in line with EU extrapolation rules. 1 extra trial on peaches, 4 trials on apricots and 3 trials on plums would be needed to obtain sufficient data for setting individual MRLs for all commodities in the group.
The individual data sets on peaches would allow deriving an individual MRL proposal of 0.4 mg/kg for peaches.

5.16 Fenbuconazole (197)(R)

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **citrus fruits (except lemons and limes):**
a chronic risk for European consumers could not be excluded. Considering the significant background exposure from the

existing EU MRLs, there is no scope to raise the MRLs for mandarins.
At EU level an MRL of 1 mg/kg is in place as an import tolerance for oranges and grapefruit.

- lemons and limes (including citron):

a chronic risk for European consumers could not be excluded. Considering the significant background exposure from the existing EU MRLs, there is no scope to raise the MRLs for lemons and limes.

5.20 Flutolanil (205)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas;**
- **edible offal mammalian:**

noting that storage stability in animal matrices was not considered.

The EU would like to introduce a **reservation** to the proposed draft MRL for the following commodity:

- brassica leafy vegetables:

for brassica leafy vegetables the extrapolation is not in line with EU extrapolation guidelines. The trial data are not sufficient to derive a group MRL according to the EU guidelines. The individual data set would allow deriving an individual MRL proposal of 0.07 mg/kg for Chinese cabbage only.

5.10 Cyprodinil (207)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **avocado;**
- **beans (dry);**
- **beans, except broad bean and soya bean (green pods and immature seeds):**

noting that at EU level a higher MRL of 2 mg/kg is in place.

- **beans (shelled);**
- **cabbages head;**
- **carrot:**

noting that at EU level a higher MRL of 2 mg/kg is in place.

- **dried herbs, except hops, dry;**
- **flowerhead brassicas (includes broccoli: broccoli, chinese and cauliflower);**
- **fruiting vegetables, cucurbits;**
- **herbs;**
- **parsnip;**
- **peppers chili, dried;**
- **pome fruits:**

since azaroles are classified under 'other small fruit & berries' in the EU, the proposed draft MRL for pome fruit will however not be included in EU legislation for azaroles.

- **radish.**

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **berries and other small fruits, except grapes:**

the extrapolation is not in line with EU extrapolation guidelines. Individual data sets would allow setting individual MRL proposals of 10 mg/kg for cane berries and 4 mg/kg for bush berries and low growing berries.

- **brassica leafy vegetables:**

the proposed draft MRL leads due to the MRL for kale to a significant increase of the livestock dietary burden. Therefore also the presence of the CGA metabolite in commodities of animal origin should be assessed. The data would allow setting individual MRLs of 15 mg/kg for all commodities of this group, except for kale.

- **edible offal (mammalian):**

considering that the metabolite CGA 304075 is the most abundant compound in this commodity it should be considered in the risk assessment and thus included in the residue definitions for enforcement and risk assessment in commodities of animal origin.

- fruiting vegetables other than cucurbits, except sweet corn and mushroom:

for aubergines and tomatoes trial data are available that allow setting an individual MRL of 0.6 mg/kg instead of applying the group MRL of 2 mg/kg. Currently at EU level an MRL of 1 is in place for aubergines. The data would allow setting an individual MRL of 2 mg/kg for peppers. It is not necessary to extrapolate from the most critical crop to the whole group.

- leafy vegetables except brassica leafy vegetables:

the extrapolation is not in line with EU extrapolation guidelines. For lettuce head trial data are available that allow setting an MRL of 6 mg/kg for head lettuce instead of applying the group MRL of 50 mg/kg. For leafy greens except head lettuce, trial data are available that allow setting an MRL of 40 mg/kg instead of applying the group MRL of 50 mg/kg. It is not necessary to extrapolate from the most critical crop to the whole group.

5.18 Fludioxonil (211)(R)

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- avocado;
- beans except broad bean and soya bean (green pods and immature seeds);
- beans (shelled);
- beans (dry):

the residue data indicate that a proposed draft MRL of 0.4 mg/ kg is sufficient according to the OECD calculator.

- dried herbs;
- eggs;
- ginseng;
- herbs;
- lettuce leaf;
- peas (pods and succulent=immature seeds):

according to the JMPR report an MRL proposal of 0.3 mg/kg was derived, while in the JMPR summary report a value of 0.6 mg/kg was reported erroneously.

- **peppers;**
- **potato;**
- **poultry meat;**
- **poultry, edible offal of;**
- **radish:**

according to the JMPR report an MRL proposal of 0.3 mg/kg was derived, while in the JMPR summary report a value of 20 mg/kg was reported erroneously.

- **snap beans;**
- **spinach;**
- **tomato:**

according to the text of the JMPR report an MRL proposal of 3 mg/kg was derived, while in the JMPR summary report and in the table of the JMPR report a value of 2 mg/kg was reported erroneously.

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **pepper chili, dried:**

the combination of indoor and outdoor trials is not in line with EU guidelines. Therefore extra trials would be needed to obtain a sufficient data set to derive an MRL. Furthermore a contradiction was noted between the proposed MRL in the JMPR report (4 mg/kg) and the value put erroneously forward in the summary report (2 mg/kg).

- **fruiting vegetables, cucurbits:**

the combination of data on cucurbits with edible and inedible peel trials is not in line with EU guidelines. For melons 2 extra trials would be needed to obtain a sufficient data set to derive an individual MRL. The data would allow setting an individual MRL of 0.2 mg/kg for cucurbits (edible peel).

5.24 Indoxacarb (216)(R)

The EU **supports the advancement** of the proposed draft MRL for the following commodities:

- **tea, green, black (black, fermented and dried).**

5.12 Difenoconazole (224)(R)

The EU **supports the advancement** of the proposed draft MRL for the following commodities:

- **citrus fruits;**
- **cucumber;**
- **gherkin;**
- **ginseng;**
- **grapes;**
- **onion, bulb;**
- **pome fruits;**
- **spring onion;**
- **squash, summer.**

Since azaroles are classified under 'other small fruit & berries' in the EU, the proposed draft MRL for pome fruit will however not be included in EU legislation for azaroles.

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas:**

the extrapolation is neither compliant with draft extrapolation rules nor with EU extrapolation guidance.

- **edible offal (mammalian);**
- **meat (from mammals other than marine mammals):**

the extrapolation beyond the highest feeding level is not accepted at EU level. The dietary burden is triggered by new uses on cabbage and potatoes which are not supported by residue data. The proposed draft MRL is expressed on a different

enforcement residue definition than the one applicable in the EU.

- **eggs;**

- **milks:**

The dietary burden is triggered by new uses on cabbage and potatoes which are not supported by residue data. The proposed draft MRL is expressed on a different enforcement residue definition than the one applicable in the EU.

- **fruiting vegetables, other than cucurbits, except sweet corn and mushroom:**

the extrapolation is not compliant with draft extrapolation rules. According to EU guidelines residue data are sufficient to derive individual MRL proposals of 0.7 mg/kg for tomatoes and aubergines and 0.5 mg/kg of for peppers.

- **melons, except watermelon:**

only 5 trials (1 incompliant) on melons are available. Melons are a major crop and thus 4 trials are not sufficient to establish an MRL.

- **potato:**

chronic consumer intake concerns could not be excluded; the intake is mainly driven by residues in potatoes from the new use. Acute intake concerns have also been identified with regard to the new use on potatoes.

5.31 Pyrimethanil (226)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **pome fruits;**

- **ginseng, dried including red ginseng;**

- **low growing berries.**

Since azaroles are classified under 'other small fruit & berries' in the EU, the proposed draft MRL for pome fruit will however not be included in EU legislation for azaroles.

5.1 Azoxystrobin (229)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **barley;**
- **coffee beans;**
- **oats;**
- **potato;**
- **pulses, dry, except soya beans;**
- **root and tuber vegetables except potato;**
- **sorghum.**

5.5 Chlorantraniliprole (230)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **berries and other small fruits;**
- **pomegranate;**
- **artichoke, globe;**
- **carrot;**
- **radish leaves, including radish tops;**
- **beans, except broad bean and soya bean (green pods and immature seeds);**
- **peas, shelled (succulent seeds);**
- **sunflower seed;**
- **rape seed;**
- **rice.**

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **peas (pods and succulent = immature seeds);**
- **coffee beans:**

the proposals are considered to be not sufficiently supported by residue data reflecting the GAP.

- eggs:

only feeds registered locally should be used in the animal burden calculation for the EU laying poultry [JMPR report 2009 General considerations 2.2]. As STMR/HR for bean/pea green and rice bran were included in the EU poultry diets but are not feed items in the EU, the dietary burdens for the EU livestock diets are expected to be lower than calculated by JMPR.

- hops, dry:

The proposal is considered not sufficiently supported by data, as the trials performed are not representative for the GAP for which the MRL proposal was derived, and parameters deviate by more than 25%.

5.27 Mandipropamid (231)(R)

The EU **supports the advancement** of the proposed draft MRL for the following commodity:

- hops dry.

5.32 Spirotetramat (234)(R)

The EU **supports the advancement** of the proposed draft MRL for the following commodities:

- artichoke, globe;

- cranberry:

however, due to differences in residue definitions, the draft MRLs will only be taken over in EU legislation if and when residue definitions are aligned.

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- bush berries:

The data is sufficient to support the proposed draft MRL on blueberries. However, additional trials on currants are required for extrapolation to currants, gooseberries and rose hips, according to EU extrapolation guidance.

5.9 Cyproconazole (239)(R)

The EU **supports the advancement** of the proposed draft MRL for the following commodity:

- coffee beans:

noting that at EU level a higher MRL of 0.1 mg/kg is in place.

Based on the obtained residue trial data, an MRL of 0.09 mg/kg would be obtained using the OECD calculator.

5.11 Dicamba (240)(R)

The EU **supports the advancement** of the proposed draft MRL for the following commodity:

- soya bean (dry).

5.33 Sulfoxaflor (252)(R)

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- beans (dry);

- carrots:

the EU wishes to maintain a general reservation pending the outcome of its own evaluation.

5.28 Penthiopyrad (253)(R)

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- barley;
- oats;
- rye;
- triticale;
- wheat.

The EU would like to introduce a **reservation to the advancement** of proposed draft MRLs for the following commodities:

- edible offal (mammalian);
- mammalian fats (except milk fats);
- meat (from mammals other than marine mammals);
- milks:

the proposed draft MRLs for commodities of animal origin cannot be taken over in EU legislation because they are derived for a different enforcement residue definition.

5.6 Chlorfenapyr (254)(T)

No comments.

5.29 Picoxystrobin (258)(R(?))

The EU **shares the view of JMPR** that MRLs cannot be proposed in the absence of sufficient toxicological data on a plant metabolite.

5.3 Benzovindiflupyr (261)(T,)*

The EU would like to **reserve its position** on the toxicological endpoints, since the approval procedure for benzovindiflupyr is still ongoing at EU level and might conclude on different toxicological reference values.

5.4 Bixafen (262)(T,R)*

The EU shares the view of JMPR that MRLs cannot be proposed in the absence of sufficient information on residues in rotational crops.

5.8 Cyantraniliprole (263)(T,R)*

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- pome fruits:

since azaroles are classified under 'other small fruit & berries' in the EU, the proposed draft MRL for pome fruit will however not be included in EU legislation for azaroles.

- cherries:

noting that 1 trial is missing.

- peach;

- plums (incl. prunes);

- bush berries;

- onion, bulb;

- garlic;

- shallot;

- spring onion;

- onion, welsh;

- brassica vegetables, head cabbages, flower head brassica;

- fruiting vegetables, cucurbits;

- lettuce head:

for fruiting vegetables, cucurbits and lettuce head it should be stated if the data sets refer to indoor or outdoor trials.

- **root/ tuber vegetables (except potato);**
- **celery;**
- **coffee beans;**
- **meat from mammals;**
- **edible offal, (mammalian);**
- **milks;**
- **poultry meat;**
- **poultry fat;**
- **poultry, edible offal;**
- **eggs;**
- **peppers chilli, dried.**

The EU would like to introduce a **reservation** to the proposed draft MRLs for the following commodities:

- **fruiting vegetables other than cucurbits (except mushrooms and sweet corn):**

the extrapolation is not in line with EU extrapolation guidelines. Individual data sets on tomato and pepper would allow deriving individual MRL proposals of 0.3 mg/kg and 0.6 mg/kg respectively.

- **leafy vegetables (except lettuce head):**

the available datasets are different with statistical significance. Individual data sets for leaf lettuce and spinach and similar would allow deriving individual MRL proposals of 15 mg/kg and 30 mg/kg, respectively.

- **potato:**

based on the available trial data, the STMR should be 0.01 mg/kg for the consumer intake calculations. Also the HR should be reconsidered.

5.15 Fenamidone (264)(T)*

No comments.

5.19 Fluensulfone (265)(T,R)*

No comments.

5.22 Imazapic (266)(T,R)*

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **eggs;**
- **maize;**
- **peanut;**
- **poultry fats;**
- **poultry meat;**
- **poultry, edible offal of;**
- **rape seed;**
- **rice;**
- **wheat;**
- **sugar cane.**

It is noted that the proposal for maize, rape seed, rice and wheat is based on residue trials in imidazolinone-tolerant crops and that these commodities are not approved for import in the EU.

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **edible offal (mammalian);**
- **mammalian fats (except milk fats);**
- **meat (from mammals other than marine mammals);**
- **milks:**

the dietary burden should be recalculated, taking into account only crops that are likely to be part of the livestock diet of the relevant diet zone.

5.23 Imazapyr (267)(T,R)*

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **edible offal (mammalian);**

- **eggs;**

- **lentil (dry):**

noting that the proposal is based on residue trials in imidazolinone-tolerant lentils and that this commodity is not approved for import in the EU.

- **maize:**

noting that the proposal is based on residue trials in imidazolinone-tolerant maize and that this commodity is not approved for import in the EU.

- **mammalian fats (except milk);**

- **meat (from mammals other than marine mammals);**

- **milks;**

- **poultry, edible offal of;**

- **poultry fats;**

- **poultry meat;**

- **rape seed:**

noting that the proposal is based on residue trials in imidazolinone-tolerant rape seed and that this commodity is not approved for import in the EU.

- **sunflower seed:**

noting that the proposal is based on residue trials in imidazolinone-tolerant sunflowers and that this commodity is not approved for import in the EU.

- **wheat:**

noting that the proposal is based on residue trials in imidazolinone-tolerant wheat and that this commodity is not approved for

import in the EU.

5.25 Isoxaflutole (268)(T,R)*

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- **sweet corn (corn-on-the-cob);**
- **chick-pea (dry);**
- **maize;**
- **sugar cane;**
- **poppy seed;**
- **meat (from mammals other than marine mammals);**
- **edible offal (mammalian);**
- **mammalian fats (except milk fats);**
- **milks;**
- **poultry meat;**
- **poultry fats;**
- **poultry, edible offal of.**

5.34 Tolfenpyrad (269)(T)*

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **tea green:**

4 trials are not a sufficient data set to derive an MRL as tea is a major crop. In addition a lack of data on the hydrolytic stability of the active substance is noted.

5.36 Triflumizole (270)(T,R)*

The EU would like to introduce a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **cherries;**
- **hops, dry;**
- **papaya:**

the metabolism data are of limited validity as the two metabolism studies on apple leaves and pears were considered not reliable. Moreover, the proposed draft MRLs are expressed on a different enforcement residue definition than the one applicable in the EU.

- **grapes;**

an acute consumer risk has been identified. The metabolism data are of limited validity as the two metabolism studies on apple leaves and pears were considered not reliable. Moreover, the proposed draft MRLs are expressed on a different enforcement residue definition than the one applicable in the EU.

- **cucumber;**
- **edible offal (mammalian);**
- **mammalian fats (except milk fat);**
- **milks;**
- **meat (from mammals other than marine mammals):**

the proposed draft MRLs are expressed on a different enforcement residue definition than the one applicable in the EU.

The EU would like to **comment** that discrepancies between the values (proposed draft MRL, HR, STMR) listed in the Circular letter/JMPR summary report and the full JMPR report were noted for the following commodities:

- **grapes;**
- **meat (from mammals other than marine mammals);**
- **edible offal (mammalian).**

5.37 Trinexapac-ethyl (271)(T,R)*

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- barley;
- eggs;
- mammalian fats (except milk fats);
- meat (from mammals other than marine mammals);
- milks;
- oats;
- poultry fats;
- poultry meat;
- poultry, edible offal of;
- rape seed;
- sugar cane;
- triticale;
- wheat.

The EU would like to introduce a **reservation** to the proposed draft MRLs for the following commodities:

- **edible offal (mammalian):**

the maximum dietary burden of 0.04 mg/kg allows proposing an MRL of 0.05 mg/kg instead of 0.1 mg/g.

The EU would like to make a **comment** on the proposed draft MRL for the following commodity:

- **wheat bran:**

a processing factor of 1.9 (table JMPR report, contradicting with 2.3 in text) would allow an MRL proposal of 6 mg/kg.