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European Union Comments
CODEX COMMITTEE ON PESTICIDE RESIDUES
47th Session
Beijing, China, 13 – 18 April 2015

AGENDA ITEM 9

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

CX/PR 15/47/11

*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 15/47/11):

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 India, 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 recommendations therein.

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 16/17 of Annex 1 (p. 8):**

The EUMS do not consider it appropriate to allow for a more flexible approach of applying the proportionality principle, given the limited practical experience. It is suggested to rephrase the last sentence of paragraph 16 as follows:

“However using 100% scaled data may help facilitate setting MRLs for minor crops if the data are regarded as sufficiently robust.”

Moreover, it is suggested to rephrase paragraph 17 as follows:

“The proportionality principle can be used on residue data from different parts of the world provided the overall uncertainty of the residue estimate is not increased.”

- **Table 1 (pp. 9/10):**

The EUMS suggest displaying the commodities sorted by the Codex codes for the groups to which they belong, in ascending order, and deleting empty lines.

- **Table 2 (p. 13):**

The EUMS suggest correcting the Codex code for Kiwi Fruit: “FI 0341”.