European Union comments on
Codex Circular Letter CL 2014/16-PR

PART A – MATTERS FOR ADOPTION BY THE 37TH SESSION OF THE
CODEX ALIMENTARIUS COMMISSION

Draft and Proposed Draft Standards and Related Texts at Steps 8 or 5/8 of
the Procedure

European Union Competence
European Union Vote

1. Draft maximum residue limits for pesticides at Step 8 (para 115, Appendix II)

The EU does not support the adoption of the draft MRL for clothianidin (238)/thiamethoxam (245) in root and tuber vegetables because of methodological differences in extrapolation. The EU requests that its reservation is included in the report of CAC 37.

2. Proposed draft maximum residue limits for pesticides at Step 5/8 (with omission of Steps 6/7) (para 115, Appendix III)

The EU supports the adoption of all the proposed draft MRLs in Appendix III of REP 14/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 37.

The EU has a policy in place whereby EU MRLs will be aligned with Codex MRLs in cases where no reservations are made. For reasons of transparency, the EU signals with reservations those cases where the alignment is not foreseen.

Diquat (31): The EU does not support the adoption of proposed draft MRLs for peas (dry); potato and soya bean (dry) because of chronic intake concerns.

Malathion (49): The EU does not support the adoption of proposed draft MRL for cherries mainly because concerns in relation to higher toxicity of the metabolites malaoxon, DMM, MMCA and MDCA.

Chlorpyrifos-methyl (90): The EU does not support the adoption of proposed draft MRLs for cereals, except maize and rice, and rice, husked because of chronic intake concerns and methodological differences in extrapolation and in livestock dietary burden estimation.

Triazophos (143)(R): The EU does not support the adoption of proposed draft MRL for rice polished because of acute intake concerns.
**Glyphosate (158):** The EU does not support the adoption of proposed draft MRL for rape seed because a lower MRL could be defined using the same residue definition and GAP as used by JMPR.

**Propiconazole (160):** The EU does not support the adoption of proposed draft MRL for plums (including prunes) because the MRL proposal is based on a limited data set combining data from two different post-harvest application types.

**Bentazone (172):** The EU does not support the adoption of proposed draft MRLs for beans (dry); beans, except broad bean and soybeans; beans, shelled; 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; and sweet corn (corn-on-the-cob) because of different residue definitions.

**Dithianon (180):** The EU does not support the adoption of proposed draft MRLs for almonds; currants, black, red, white; edible offal (mammalian); eggs; hops, dry; meat (from mammals other than marine mammals); milks; pome fruits; poultry meat; poultry, edible offal of; stone fruits; table grapes; and wine grapes because of chronic intake concerns and because of methodological differences in extrapolation in the case of the proposed group MRL for stone fruits.

**Fenpyroximate (193):** The EU does not support the adoption of proposed draft MRLs for edible offal (mammalian) and meat (from mammals other than marine mammals) because of different residue definitions and for stone fruits because of methodological differences in extrapolation.

**Fenbuconazole (197):** The EU does not support the adoption of proposed draft MRL for citrus fruits because of chronic intake concerns.

**Flutolanil (205):** The EU does not support the adoption of proposed draft MRLs for brassica leafy vegetables because of methodological differences in extrapolation.

**Cyprodinil (207):** The EU does not support the adoption of proposed draft MRLs for berries and other small fruits (except grapes); brassica leafy vegetables; fruiting vegetables other than cucurbits; and leafy vegetables (except brassica leafy vegetables) because of methodological differences in extrapolation and for edible offal (mammalian) because of different residue definitions.

**Fludioxonil (211):** The EU does not support the adoption of proposed draft MRLs for pepper chili, dried and fruiting vegetables, cucurbits because of a different approach on data combination.

**Difenconazole (224):** The EU does not support the adoption of proposed draft MRLs for brassica (cole or cabbage) vegetables; head cabbages; flower head brassicas; melons, except watermelon; fruiting vegetables, other than cucurbits (methodological differences in extrapolation); edible offal (mammalian); meat (from mammals other than marine mammals); eggs; milks (different residue definitions) and potato (acute intake concerns).

**Chlorantraniliprole (230):** The EU does not support the adoption of proposed draft MRLs for eggs because of a different approach on the animal burden calculation and for peas (pods and succulent = immature seeds); coffee beans; hops, dry; and peas, shelled because of methodological differences in extrapolation.

**Spirotetramat (234):** The EU does not support the adoption of proposed draft MRLs for bush berries because of methodological differences in extrapolation.
Sulfoxaflor (252): The EU does not support the adoption of proposed draft MRLs for beans (dry); and carrots pending the evaluation in the EU.

Penthiopyrad (253): The EU does not support the adoption of proposed draft MRLs for animal commodities because of different residue definitions.

Cyantraniliprole (263): The EU does not support the adoption of proposed draft MRLs for leafy vegetables (except lettuce head) and fruiting vegetables other than cucurbits (except mushrooms and sweet corn) because of methodological differences in extrapolation.

Imazapic (266): The EU does not support the adoption of proposed draft MRLs for mammalian commodities because of a different approach on the livestock dietary burden calculation.

Tolfenpyrad (269): The EU does not support the adoption of proposed draft MRLs for tea, green because of the insufficient number of trials and the absence of a hydrolytic processing study.

Triflumizole (270): The EU does not support the adoption of proposed draft MRLs for cherries; hops, dry; papaya; cucumber; and mammalian commodities because of different residue definitions. Moreover, the EU noted a different approach on the assessment of metabolism studies for cherries; hops, dry; and papaya; and acute intake concerns for grapes.

Trinexapac-ethyl (271): The EU does not support the adoption of proposed draft MRLs for edible offal (mammalian) because of a different approach on the livestock dietary burden calculation.