European Community Comments for the

CODEX COMMITTEE ON PESTICIDE RESIDUES

37th Session, The Hague, 18 – 23 April 2005

Mixed Competence
Member States Vote

Agenda Item 3: Matters referred to the committee by CAC, JMPR etc

CAC: A). progress report on scientific advice.

The Member States of the European Community would like to know the present situation concerning the funding of Scientific advice by Codex subsidiary bodies, in particular the work by JMPR. We have seen an answer by WHO and FAO to the letter by the chairman of the friends of the JMPR. Does this mean in practice that the budgetary problems for JMPR have been solved?
The Member States of the European Community strongly support the definitions of Risk Analysis Terms: Food Safety Objective (FSO), Performance Objective (PO) and Performance Criterion (PC) as adopted on an interim basis for inclusion in the Procedural Manual.
The Member States of the European Community are therefore of the opinion that CCPR should recommend the endorsement of these definitions by CCGP prior to their final adoption.
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### Agenda Item 4: Comments on general Considerations in JMPR Report /2004.

The European Community (EC) is pleased with the explanations in this clear and comprehensive chapter.

**2.1 ARfD**  
The EC agrees with the definitions.  
EC questions the strict cut off criteria of 5mg/kg bw. This may in most cases be correct but should it not also be linked to the application rate/residue to be found. Some pesticide are applied in such a high concentration (captan, sulphur, bromide ion) that there may be such exposures. Human studies are only acceptable for the EC when they are not generated especially for the purpose of lowering the uncertainty factor. There should not be an incentive for doing these human studies. When data are available and generated for other reasons (e.g. when there are human medicinal applications cf malathion) the EC has no problem in accepting these data. The idea of setting different ARfDs for different population groups is not acceptable for the EC.

**2.4 Worksharing project trifloxistrobine**  
EC agrees that shared evaluation could be positive and my save time an avoid duplication. In principle this could increase the number of evaluated substances. Interim MRLs may only work when a sufficient database is available.

**2.5 Comparison JMPR and Pilot project recommendation.**  
The differences are consistent with discussions that took place earlier in CCPR on the acceptability of small datasets, highest residues, outliers etc nevertheless the differences in the conclusions are few. EC agrees that there should be clarity about the meaning of the word safer in "safer replacement pesticides".

**2.6 Monitoring data in spices.**  
The EC regret that no more info is made available on the GAPs and authorised uses. At least the enforcement bodies need some cues about which pesticides they have to seek. If this info is known to governments it should be provided. The EC agrees that for monitoring, data should not be used for MRLs reflecting post harvest uses.

**2.10 Project on minimum data requirement for MRLs.**  
The EC is pleased with the impact of the project. For criteria on significance in trade and diet refer to the EC guidance document (http://europa.eu.int/comm/food/plant/protection/resources/app-d.pdf). The comparison of what is acceptable for JMPR and the proposed minimum requirements show that on a case by case basis none can deviate from the exact number of trials based upon expert judgement.
The Member States of the European Community welcome the continued work of GEMS/FOOD and hope that further data on consumption of rare and exotic food commodities will become available.

In table 2 the names of the processed barley products are missing.
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European Community Vote

Agenda Item 9: Risk analysis policies

The European Community welcomes this document that clarifies the situation in view of new political and scientific developments.
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European Community Competence
European Community Vote

**Agenda Item 12: Classification of Food and Feed**

The European Community welcomes the work done on the classification and agrees with the recommendations.