The European Community and its Member States (ECMS) would like to present the following comments on General considerations in the 2005 JMPR Report.

2.1. Work sharing
The European Community and its Member States are in favour of work sharing and peer review of national, regional evaluations. The ECMS see this as the way forward in dealing with the backlog of evaluations of active substances that have already been evaluated nationally/regionally but not yet internationally.

2.3. Statistical approach
The ECMS are in favour of a statistical approach (the EC applies, when possible a different statistical method), the calculations show how important it is that a minimum number of trials are required as small sample sizes make the method unreliable.

2.4. Crop classification
The EC also adopted a new system of crop grouping in the framework of new residue Regulation with 12 Groups and 387 commodities taking into account the possibilities for extrapolation.

2.5. Minor crop initiative.
The ECMS welcome the minor use initiative and supports sharing of data and is also willing to share data from EC minor crops

2.7. Alternative GAPS
The ECMS are in favour of the Prospective approach. In contrast to chronic intake assessment, the short term intake assessment has few accepted possibilities for refinement and thus it is appropriate to look at alternative scenarios already in an early stage. However, such an approach should not be decided before international agreement on the IESTI equation (e.g. variability factor) is reached.

2.8. Variability factor.
JMPR decided that a generic factor is the most appropriate to cover the variability on all crops, for various applications and pesticides. The ECMS' position is that such a decision is not pure risk assessment, but that this decision should also be taken in the CCPR.
The information available and analysed by the European Food Safety Authority (EFSA) suggests that different factors may be applicable to different crops, different pesticides, application methods and that variation in the variability factors is not merely caused by measurement uncertainty as assumed by IUPAC.

Therefore the ECMS are in favour of accepting various factors supported by data in each situation, and where the situation is not known, apply a default factor. The discussion about what factor should be adopted as the default factor has not been finalised yet in the EC. Presently the discussion takes place in which the issue is put in the broader context of the whole IESTI equation. In the framework of Codex, a preliminary variability factor of 5 is acceptable to the European Community and its Member States. The EC has used this factor to do the calculations.

2.10 Fat soluble Pesticides
The ECMS agree on the new cut-off value of 3 for the “Pow” equation. In the case of meat containing hardly any fat there is a problem for the quantification of pesticide residues when only expressed on the fat content. The ECMS therefore propose to express the MRL on both fat and meat.

2.11
The ECMS agree to delete animal forage

2.14. Project to update principles and methods for risk assessment of chemicals in food
The ECMS are of the opinion that information needed about the status of project.
- What is relationship with the methods and principle reported to CCPR in the JMPR Report?
- Will the end result reported to CCPR? In what way has CCPR a say in the adoption of methodology?
- Is this a general establishment of principles and methods or is the intention only to harmonise JMPR and JECFA methods?

2.16. Probabilistic modelling
The ECMS agree that development of a Probabilistic method for assessing the safety of MRLs is strictly speaking not necessary. However, it may be useful to assessing safety of a particular use of a plant protection product or the estimation of cumulative and aggregate risk of pesticides with a similar mode of action. In the context of safety of MRLs and variability factor ECMS are evaluating the whole ESTI equation. The ECMS agree that only limited information is available for short term intake assessment. GEMS/Food should focus on obtaining more information.

EFSA is also working on this issue and the ECMS suggest possible collaboration of EFSA in that matter.

2.17 Risk analysis
The ECMS agree with the principles, but the factors in risk analysis are not always so easy to separate. Risk Analysis is a shared responsibility between JMPR and CCPR. (end)