Agenda Item 3
Matters referred to CCPR (CX/PR8/40/2)

Agenda Item 4
JMPR Report 2007, Point 2, General Consideration
(CL 2008/-PR)

2.1 Short-Term Dietary intake assessment: further considerations

The ECMS agree that the parameters of the short-term dietary intake assessment calculation (HR/MRL, bw, variability factor, LP) and the ARfD are associated with uncertainty and biological variability. The ECMS, however do not agree that such uncertainty has necessarily resulted in the parameters being too conservative or overprotective.

The ECMS are currently reconsidering the IESTI equation and its parameters. The EFSA opinion as cited by the joint meeting was advice to EU risk managers asking for guidance on this issue. It should be noted that the EU is only interested in changing the IESTI equation if this will not result in a lowering of the level of consumer protection.

The ECMS highly welcome the recommendation by the JMPR that FAO and WHO should address the issues identified for further discussion and organise a consultation.

2.2 Codex maximum residue limits for compounds no longer supported by companies/sponsors

The ECMS agree that when the original manufacturers do not supply the data required, JMPR cannot carry out a periodic review. As soon as it is clear that no interested party is submitting data, CXLs should be recommended by CCPR for withdrawal.

2.3 Toxicological relevance of triazole fungicides and their common metabolites

The ECMS welcome the recommendation by the JMPR that a full toxicological evaluation of the triazole metabolites should be performed and agree with the JMPR opinion that there is a possibility of combined exposure of the consumer to more than one triazole fungicide. CCPR should be informed that EFSA started in 2008 a project on common mechanism groups for triazole fungicides and their metabolites. Depending on the results on the additivity of these metabolites cumulative dietary risk assessment may be performed and common residue definitions may be developed.
### 2.4 Setting of reference values for organophosphorus pesticides: relevance of the biochemical characteristics of the individual compounds

The ECMS note that the explanation by JMPR shows that there are huge differences (50x) in single dose effect between the two types of OPs, but these effects are not represented in a huge difference in ARfDs (only 10x) due to the weight that is given by the presence of human data.

### 2.5 Consideration of selection of residue data from supervised trials

The ECMS encourages JMPR to use the highest residues measured in replicate field samples taken from one experimental plot instead of the average residue.

### 2.6 Reconsideration of alternative GAPs

The ECMS support that different approaches will be used by JMPR to make the best use of data available and agrees with the proposals for the data submissions for alternative GAP evaluation.

The ECMS agree with the opinion of the JMPR that the proposal to calculate a theoretical “acceptable highest residue” should not be supported. The theoretical value would only consider the ARfD and consumption data, but is not based on an existing GAP and on appropriate supervised residue trials. A theoretical calculated value should not be used to estimate a maximum residue level because pesticide residues should generally not be present in food unless there is a GAP and supervised residue trials data that support the GAP. However, we agree that publication of such a “threshold level” might be useful to manufacturers and growers in developing alternative GAPs.

### 2.7 MRLs for processed foods (establishment of MRLs and/or processing factors for processed and ready-to-eat foods)

The ECMS believe that MRLs should only be established for RACs and agree with the opinion by the JMPR that the use of default processing factors should be restricted to situations where there was no other form of processing involved (e.g. dehydration) and welcomes the list of dehydration factors.

Relevant processing factors should be used to estimate residues in processed commodities for the purpose of risk assessment or for extrapolating from the MRL for the RAC to the equivalent level in the processed commodity.

Notifiers should be responsible for generating data with which to calculate compound-specific processing factors.

Generic default processing factors should only be used where there is reasonable evidence that the processing factor is not compound specific.

It should be pointed out that a contradiction is included in the present JMPR approach of only fixing different MRLs for processed commodities when there is concentration. In the case of dilution the MRL is the same as for the RAC. When intake calculation is based on the assumption that there is dilution, the MRL for the processed commodity should be lower than the MRL for the RAC. In this respect it is highly welcomed that JMPR will still document the processing factors used in decision making and in dietary intake.
2.8 Crop groups and commodity group MRLs

The ECMS welcome the recommendations by the JMPR that crop groups should have on the one hand comparable pesticide product label directions within each crop group and on the other hand comparable residue characteristics within each commodity group.

2.9 Statistical methods for the estimation of MRLs

In general, the ECMS welcome the use of statistical methods (e.g. NAFTA spreadsheet including EU methods) in the evaluation of residue supervised trials data. It should be emphasized that the results of such statistical methods are only predicted values of the highest residue to be expected under a given GAP and that the best scientific judgement in the assignment of the MRLs must be used by risk assessors. Especially questions of outliers, number of data points and values below LOQ should be carefully considered. For risk managers the question of scaling must be discussed in more detail. The ECMS want evidence to support any statistical method chosen to ensure that it adequately protects the consumer.

2.11 Status report from the OECD Expert Group on Residue Chemistry Guidelines

The ECMS welcome that the results of the FAO/OECD zoning project (2002) will be reconsidered.

The ECMS welcome that the OECD guidelines and guidance documents will be utilized in the preparation of future versions of the FAO Manual for harmonization and to facilitate work sharing.

2.12 Residues in dried chilli peppers

The ECMS agree with the recommendation by the JMPR to use different concentration factors of 10 or 7 depending on the available information (data on sweet peppers or fresh chilli peppers, respectively) to estimate maximum residue levels of pesticides in dried chilli peppers.

RESPONSE TO SPECIFIC CONCERNS RAISED BY THE CODEX COMMITTEE ON PESTICIDE RESIDUES

3.1 Carbendazim (072)

The toxicity of the carbendazim will be reevaluated in 2008 during the reregistration process in the EC. The EC will reconsider the ARfD of carbendazim including the increased safety factor and inform the Committee on the outcome of the evaluation as soon as it is available.

3.3 Methiocarb (132)

The ECMS still oppose the setting of a MRL of 2 mg/kg for sweet peppers due to intake concerns.

The intake was recalculated using the EFSA model (http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1178620776373.htm), an ARfD of 0.02 mg/kg (JMPR 2005) and a HR of 1.5 mg/kg. The ARfD was exceeded by
- 475 % for DE children (age 2 -5 years, variability factor 7)
- 205 % for DE children (age 2 -5 years, variability factor 3)

The German consumption data for children from 2 to 5 years are not included in the consumption data base used by the JMPR, though they were submitted in 2005 to WHO GEMS/Food. Overall (European) consumption figures can be found at the link given above.

3.4 Quinoxifen
The new proposal for fat does not raise concerns for consumers.

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**Agenda Item 5.**

**Draft and Proposed Draft Maximum Residue Limits for Pesticides in Foods and Feeds at Steps 7 and 4**

**Comments at Steps 6 and 3**

**General:**

*EC intake calculation models and diets*

EFSA has compiled all the national diets and intake models of the EU Member States, including those for specific groups such as children, infants, elderly etc. The EC agreed to use the EFSA model (rev. 2) for estimating the safety of MRLs. The model can be downloaded at http://www.efsa.europa.eu. The model is continuously updated by EFSA.

*Fixing endpoints for separate consumer groups*

The EC is in favour of continuation of the risk management policy to fix ADIs and ARfDs for the general population and not for subgroups. This policy is also used in other areas.

*Use of data from human volunteers*

The EC does not a priori reject the use of human data, but is in favour of a case by case assessment. Depending on the scientific quality and relevance of the studies and the ethical standards applied they can be used to support the conclusions from animal studies. However, the EC objects to the lowering of the interspecies uncertainty factor when setting an ADI or ARfD, if solely based upon studies on human volunteers.

**Lambda Cyhalothrin**

**ADI**

In the EU the ADI (0.005 mg/kg bw) is based on the NOAEL (no observed adverse effect level) (0.5 mg/kg bw/day) obtained from dog studies (1-year and 26 weeks). LOAEL (lowest observed adverse effect level): 3.5 mg/kg bw/day (neurotoxic clinical signs). An uncertainty factor of 100 is considered to be relevant.

The ADI is usually based on long-term studies and not short-term studies, therefore the 1-year study on dogs seems to be the most relevant study. Moreover, undertaking a risk assessment
for children, an extra safety factor could be necessary.

**ARfD**

In the EC the ARfD (0.0075 mg/kg bw/day) is based on the NOAEL (0.75 mg/kg bw) obtained from a six week oral toxicity study in dog. LOAEL: 1.5 mg/kg bw/day (tremor). An uncertainty factor of 100 is considered to be relevant.

However, the EC considers an uncertainty factor of 100 to be relevant also in this case. Moreover, undertaking a risk assessment for children, an extra safety factor could be necessary.

**The EC will submit a concern form.**

### 002 Azinphos-methyl

Azinphos-methyl is no longer authorized for use in the EU. Nevertheless some import tolerances have been evaluated and granted. The toxicological endpoints used are ADI: 0.005 mg/kg bw/d; ARfD: 0.01 mg/kg bw/d. The difference with the endpoints proposed by JMPR is that JMPR used a lower interspecies uncertainty factor because of the human studies. The EC would like to note a reservation in the report and will not accept CXL based on these toxicological endpoints.

### 007 Captan

The EC opposes the advancement of the MRLs for (table) grapes, died grapes, pome fruit and peaches because of acute dietary exposure, even with an ARfD of 0.3 mg/kg bw /d. Some existing MRLs also give rise to acute intake problems (apple, pear).

### 008 Carbaryl

The CCPR decided in 2006 to return the draft MRLs for cherries; citrus fruits; citrus juice; citrus pulp, dry; dried grapes (=currants, raisins and sultanas); grape juice; grape pomace, dry; grapes and stone fruits to Step 6, awaiting the outcome of the 2007 JMPR evaluation. The JMPR 2007 They only evaluated the new applications on cranberries and chilli pepper and did not make a new risk assessment for cherries; citrus fruits; citrus juice; citrus pulp, dry; dried grapes (=currants, raisins and sultanas); grape juice; grape pomace, dry; grapes and stone fruits.

The EC opposes the advancement of MRLs for grapes and stone fruit because of acute intake concerns and request returning all other MRLs in step 6 awaiting further JMPR evaluation.

### 027 Dimethoate

The EC opposes the advancement for lettuce and peppers due to intake concerns. Furthermore, the EC is concerned that omethoate is not included in the Codex residue definition for dimethoate. Omethoate is the principle metabolite of dimethoate, and is 7 times more toxic than dimethoate. Although omethoate is included in the definition for risk assessment, it is not possible to determine whether monitored residues are safe for consumers, unless omethoate is included in the analysis.

The EC support returning the proposed MRLs for chilli peppers, pepper to Step 6 due to intake concerns.
**032 Endosulfan**

Endosulfan uses are going to be withdrawn in the EU and there are MRLs only to cover essential uses.

The EC supports the JMPR recommendation to withdraw some MRLs, where there is consumer exposure concern.

The EC opposes to advancement for broccoli, celery cherries, tomatoes. The JMPR stated that the NESTI exceeds the ARfD for broccoli, celery, cherries and tomatoes because of acute intake concerns.

**037 Fenitrothion**

The EC opposes the advancement for apples due to intake concerns. The EC opposes the advancement of the MRL of 6 ppm for rice and wheat due to intake concerns (for the other cereals there is no problem), pending consideration of processed commodities, especially for wheat.

**041 Folpet**

At the request of CCPR 39 the EC specifies the following acute intake concerns for children:

- Lettuce – MRL = 50 mg/kg, HR = 39 mg/kg
- Apple – MRL = 10 mg/kg, HR = 8.0 mg/kg
- Table grape – MRL = 10 mg/kg, HR = 5.9
- Melon – MRL = 3 mg/kg, HR = 2.2 mg/kg (no information on pulp residue).

Extract from the EFSA model with VF 3, ARfD 0,2:

<table>
<thead>
<tr>
<th>ARfD/ADI (mg/kg)</th>
<th>Commodities</th>
<th>HR/ threshold MRL</th>
</tr>
</thead>
<tbody>
<tr>
<td>314,8</td>
<td>Lettuce</td>
<td>39 / 12,38</td>
</tr>
<tr>
<td>288,9</td>
<td>Apples</td>
<td>8 / 2,76</td>
</tr>
<tr>
<td>193,2</td>
<td>Table grapes</td>
<td>5,9 / 3,05</td>
</tr>
<tr>
<td>166,9</td>
<td>Melons</td>
<td>2,2 / 1,31</td>
</tr>
</tbody>
</table>

**049 Malathion**

The EC opposes to advance the proposed MRLs for commodities which can also be used as animal feed beyond step 6 until animal feeding studies on ruminant animals and analytical methods for animal products are available.

The EC proposes revocation of the following CXLs: *raspberries, red and black* (8 mg/kg) and *root and tuber vegetables* (0.5 mg/kg). Withdrawal was recommended by the JMPR, 1999. CCPR (2001): retained for four years under the Periodic Review Procedure awaiting new residues data. No new data has been provided.

**072 Carbendazim (incl. benomyl and thiophanate-methyl)**

This substance is scheduled for re-evaluation and re-registration in the EU.
See point 3.1

The EC may remind the Committee that it requires for chili peppers a long-term intake calculation

**090 Chloryprifos-methyl**
No advance of the MRLs for cereals must be done until the JMPR toxicity and residue evaluation finish in 2010/2008, to be in line with the results from feeding studies that led to very low MRLs for milk and other products of animal origin.

**094 Methomyl**
The EC opposes advancement beyond step 7 for apple (210%), brassica (cauliflower, broccoli, head cabbage) (392%), grapes (1231%), leafy vegetables, lettuce (733%) and spinach (204%) because of an acute intake concern.

**095 Acephate**
All uses have been withdrawn in the EC.

The EC opposes advancement of pome fruits (123%, children) MRLs due to an intake concern. Existing MRLs based on European uses only, must be withdrawn. Moreover, methamidophos is a metabolite of acephate and the use of acephate resulted into MRL proposals for both methamidophos and acephate. The methamidophos MRLs that are associated with the proposed acephate MRLs give an exceedance of the EU ARfD (see comment methamidophos). Consequently, the EC also oppose the advancement of the proposed acephate MRLs on, flowerhead brassicas, mandarins, nectarine, peach and peppers.

**096 Carbofuran**
All uses have been withdrawn in the EC. The proposed MRLs for cantaloupe, cucumber, potato, squash and sweet corn lead to an exceedance of the EU ARfD (0.001 mg/kg bw). The EC therefore opposes to any advancement of these MRLs. The EC has no objection to the advancement of the proposed MRLs on oranges and mandarins.

The EU ARFD of 0.001 mg/kg bw was set on the basis of a study of 2002.

The JMPR ARfD of 0.009 mg/kg bw was set on the basis of another study. However, the study of 2002 which was the basis of the EU ARfD was not evaluated by JMPR. JMPR is invited to reconsider the ARfD based on this study. **The EC will submit a concern form.**

**100 Methamidophos**
The EC ARfD is more than three times lower (0.003 mg/kg bw/day) than JMPR ARfD (0.01 mg/kg bw/day)

The EC opposes the advancement beyond step 6 of the MRLs for flowerhead brassica, mandarins, nectarines, peaches, peppers and pome fruit, (which are all linked to the use of acephate) because of acute intake concerns.

**103 Phosmet**
The proposed MRLs on nectarine, apricot, apple and pear cannot be accepted by the EC because of acute intake problems.

Regarding blueberries MRL, the EC considers that proposed MRL of 15 ppm is too high, because the residue data justify a MRL of 10 ppm (residue data: 1.0, 2.4, 3.4, 3.7, 4.0, 4.0, 5.8, 6.6 and 9.9 ppm RmaxI= 12.43 mg/Kg RmaxII= 12.40 mg/Kg, less than 12.50 mg/Kg, and all the figures were below 10 ppm). We have to consider that the acute exposure due to consumption of blueberries juice is too high for children.

**112 Phorate /potato**
Uses of Phorate have been withdrawn in the EU.
The EC opposes advancement of proposed MRL for potato because of unacceptable risk to consumers (250 % of ARfD for children)

**126 Oxamyl**
The EC requests not to advance the MRL beyond step 6 for citrus, cucumbers, melons and peppers because of acute intake concerns and to await for the JMPR evaluation of the retrospective alternative GAPS.

For dried chilli peppers, the EC does not support the advancement because of short-term intake concern.

**136 Procymidone**
The 2007 JMPR meeting has established following end-points for procymidone:

- ADI:  0–0.1 mg/kg bw/d  (Rat, studies of developmental and reproductive, SF 100)
- ARfD: 0.1 mg/kg bw/d  (Rat, study of developmental toxicity, SF 100)

Lowest values have been proposed at EU level in 2007 for procymidone:

- ADI: 0.025 mg/kg bw/d  (Rat; 2-generation rat study SF 100)
- ARfD: 0.035 mg/kg bw/d  (Rat developmental study, SF 100)

Based on these new EU toxicological end-points, the EC informs the Codex committee that EU MRLs will be reduce to the LOQ (0.02* mg/kg) for the following crops, these current MRLs leading to an unacceptable acute intake.

Pears (174% ARfD), Apricots (177% ARfD), Cherries (217% ARfD), Peaches (237% ARfD), Plums (123% ARfD), Table grapes (856% ARfD), Strawberries (224% ARfD), Raspberries (121% ARfD), Tomatoes & aubergines (138% ARfD), Pepper (323% ARfD), Head Cabbages (201% ARfD), Lettuce, scarole and similar (850% ARfD), witloof (186% ARfD)

The EC will submit a concern form.

**133 Tradimefon/168 Triadimenol**
The EC opposes the advancement of the MRL for grapes, sweetcorn, pepper, tomatoes, melons and bananas due to acute intake concerns. The EC reserves the option to change
comments following completion of the EU review of triadiemenol. Triadimefon has been withdrawn in the EU.

<table>
<thead>
<tr>
<th>142 Prochloraz</th>
<th>The EC does not support the advancement of 40 mg/Kg for mushroom due to intake concern and to await for the JMPR evaluation of alternative GAPs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>145 Carbosulfan</td>
<td>The main metabolite of carbosulfan in potatoes is carbofuran, which leads to unacceptable consumer exposure (see also comment of carbofuran). Consequently, the EC opposes the advancement of the proposed carbosulfan MRL on potatoes. The EC has no objections to the advancement of the proposed MRLs on oranges and mandarins</td>
</tr>
<tr>
<td>157 Cyfluthrin / 228 Betacyfluthrin</td>
<td>The EC objects to advancement beyond step 6 of the proposed MRLs for citrus fruits, broccoli, head cabbage and cauliflower because of acute intake concerns. The EC acute dietary risk assessment was carried out with an ARfD of 0.02 mg/kg, the use of variability factors of 7 or 5 and the consumption data of the EFSA model. The ARfD is exceeded for oranges (132%, UK infants), broccoli (437%, BE child), cauliflower (300%, NL child) and head cabbage (553%, NL child). The 2006 JMPR established for cyfluthrin and beta-cyfluthrin a group ADI of 0-0.04 mg/kg bw and an ARfD of 0.04 mg/kg bw based on a NOAEL of 1 mg/kg bw, for findings of acute neurotoxicity observed in a-4 week gavage study in rats with beta-cyfluthrin and a safety factor of 25. The active substances were included in Annex I of Directive 91/414/EEC in 2002. The ADI is 0.003 mg/kg bw. An ARfD of 0.02 mg/kg was derived from a NOAEL of 2 mg/kg bw in an acute neurotoxicity study on rats with beta-cyfluthrin and a safety factor of 100. The 2007 JMPR proposed MRLs on a number of plant and animal commodities. The EC agrees that no long-term dietary intake concern exists (based on the STMR values and the EC ADI of 0.02 mg/kg bw). The EC acute dietary risk assessment was carried out with an ARfD of 0.02 mg/kg, the use of conservative variability factors of 7 or 5 and the consumption data of the EFSA model. The ARfD is exceeded for oranges (132%, UK infants), broccoli (437%, BE child), cauliflower (300%, NL child) and head cabbage (553%, NL child). The EC will submit a concern form.</td>
</tr>
<tr>
<td>160 Propiconazole</td>
<td>(Technical comment to the JMPR Report (2007): According to p. 233-234 long- term intake and short-term intake calculations for propiconazole are given in Annexes 3 and 4, respectively. However, intake calculations are missing from annexes.)</td>
</tr>
<tr>
<td>165 Flusilazole</td>
<td>The EC has established a lower ARfD of 0.005 mg/Kg/bw as a developmental endpoint and so do not support the MRL advancement for pome fruit, peaches, nectarines and bovine edible</td>
</tr>
</tbody>
</table>
The EC will submit a concern form.

### 166 Oxydemeton-methyl
The EC requests not to advance the MRLs beyond step 6 because the ADI is exceeded for toddlers. ARfD was also exceeded for toddlers for apples, cabbages head, grapes, oranges.

### 193 Fenpyroximate
Fenpyroximate was evaluated by the 2004 JMPR for acute toxicology only. An ARfD of 0.01 mg/kg bw was established. In former comments the ECMS require to revoke the CXLs for grapes and apples because the ARfD was exceeded.

The compound was re-evaluated by the 2007 JMPR for acute toxicity because a new single dose study in dogs was submitted. An ARfD of 0.02 mg/kg bw was established by the 2007 JMPR.

Based on the submission of the same new single dose study in dogs the EC revised the ARfD from 0.01 mg/kg to 0.02 mg/kg bw and agrees with the evaluation made by JMPR.

The EC acute dietary risk assessment for apples and grapes was carried out with an ARfD of 0.02 mg/kg, the HR values reported by JMPR, the use of conservative variability factors of 7 or 5 and the consumption data of the EFSA model. Using the HR of 0.57 mg/kg grapes, the ARfD is exceeded for table grapes (187%, DE child).

The EC agrees that no long-term or short-term concern exists for apples and has no concern to advance the proposed MRL on apples (0.3 mg/kg).

The EC has concerns to advance the proposed MRL on grapes (1 mg/kg). It is proposed to look for an alternative GAP.

### 194 Haloxyfop
The EC requests that all draft MRLs be retained at step 4 or 7 because no new residue data received. Haloxyfop will be evaluated by JMPR in 2009.

### 212 Metalaxyl-M/Metalaxyl
The EC opposes to the revocation of the CXLs for Metalaxyl since Metalaxyl is resubmitted in the EU Review Programme. Evaluation of the substance will be finalised at the latest by 30th of June 2010.

The EC therefore proposes to postpone the phasing-out until 2 years after this deadline and to maintain in the meantime the draft MRLs of Metalaxyl-M in step 6.

### 220 Aminopyralid
The EC agrees that no progression of MRLs can be made until the full data package is evaluated.

### 222 Quinoxyfen
The new proposal for fat does not raise concerns for consumers.
Dimethomorph was evaluated for the first time by the 2007 JMPR where an ADI of 0-0.2 mg/kg bw and an ARfD of 0.6 mg/kg bw were established.

The EC established an ADI of 0.05 mg/kg bw based on a 1-year study on dogs and a safety factor of 100. In case of the ARfD, the EC confirmed the toxicological evaluation and the ARfD of 0.6 mg/kg bw.

The 2007 JMPR proposed 20 MRL for plant and animal commodities. The ECMS agree that no long-term or short-term concern for the proposed MRLs exists and has no concern to advance the proposed MRLs.

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**Agenda Item 6**

**Proposed Draft Revision of the Codex Classification of Foods and Animal Feeds at Step 4**

**Comments at Step 3**

The document "The Selection of Representative Crops, Principles and Guidance" describes how to add a crop to a certain crop group. This description was made in the past orally. The written presentation is highly welcomed. It shows that a lot of work is done in the background and it is expected that crop grouping will be of high quality. The example of almonds makes this visible.

Concerning extrapolation the selection of representative crops is well described taking into account the needs of different regions in the world. The EC recently amended their extrapolation rules, especially for a number of minor crops. The new extrapolation document of ECMS will be send to the drafting group.

From the EC point of view it makes sense to draft separate papers, one for the crop grouping and one for representative crops. It is expected, that from time to time a critical review of the representative crop may be necessary since parameters for choosing a crop may change.

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**Agenda Item 7**

**Matters related to Methods of Analysis for Pesticide Residues (to be considered by the Ad Hoc Working Group):**

(a). **APPLICATION PRACTICES ON THE ESTIMATION OF UNCERTAINTY OF RESULTS (ALINORM 06/29/24, paras 173-177)**

In general the ECMS agree with the content presented in the discussion paper. However, a certain and most important situation is not reflected in the discussion paper. This particular situation is described in para. 90 of the AQC document (SANCO/2007/3131) which states - "In cases where exceedances of a MRL at the same time cause an exceedance of the acute reference dose, an expanded uncertainty with a lower confidence level can be applied as a precautionary measure". The AQC document is included as reference 5 of the discussion
Moreover, in response to para. 23 of the discussion paper, the ECMS have noted that the CCMAS, which is the Codex Committee having overall competence on general matters about methods of analysis and sampling, has decided to undertake work on the same issue of measurement uncertainty at its last session (Budapest, Hungary, 10 - 14 March 2008 - ALINORM 08/31/23 - para. 94-102). The issue of measurement uncertainty is not limited to pesticide residue analysis and a horizontal approach should be favoured in this case. They suggest that the two Committees interact in order to avoid duplication of work and provide effective clarification on the issue of measurement uncertainty.

(b). METHODS OF ANALYSIS FOR FAT-SOLUBLE PESTICIDES IN WHOLE MILK AND MILK FAT (ALINORM 06/29/24, paras 183 - 188)

The ECMS agree to the Australian recommendation (CX/PR 08/40/11): to only fix MRLs for whole milk and that where information is available for the residues on the fat, the MRL will be recalculated for the whole milk.

Agenda Item 9
PRIORITY LIST

The ECMS suggest that dimethoate should be scheduled for periodic review, and that JMPR should consider the inclusion of omethoate in the residue definition of dimethoate

C. Follow-up evaluations

Ethoxyquin

Germany, as acting as EC Rapporteur Member State for this active substance in the EU, was faced with difficulties when evaluating the toxicological behaviour because of apparent data gaps and the poor quality of many reports. A comprehensive health evaluation became possible only by including additional references that were provided by the RMS and the 1998 JMPR evaluation. An increased safety factor for the derivation of the ADI and the ARfD was applied, since fully valid long-term studies, neurotoxicity studies and original data on reproduction were lacking.

Indeed, it is known that this active substance is used in veterinary medicine, as additives in feeding stuffs and as fungicide in plant protection. In addition, residues resulting from uses of that active substance in other area should be included in dietary exposure assessment. Therefore, a periodic re-evaluation is recommended as soon as possible.

D. Periodic re-evaluation

Dinocap

It is proposed to schedule the re-evaluation of dinocap at the same time as meptyldinocap as both active substances are closely related.

Bromide ion

The evaluation of bromide ion should be done in relation to methyl bromide. In addition
natural occurring levels of bromide ion should be requested by means of a circular letter.

Tecnazene, dichlofluanid, disulfoton, fenvalerate, bromopropylate, diazinon methidathion

No support fort he mentioned active substances

**E. Replacing racemic chemicals with resolved isomers**

In general, replacing of racemic chemicals with resolved isomers is supported whenever feasible.

Dinocap ist a mixture of different racemic compounds. Meptyldinocap is only one of these different compounds and it is still a racemic mixture. Therefore, this case is different from replacing of racemic chemicals with resolved isomers.

**F. Chemicals due for periodic re-evaluation and no longer supported by companies / sponsors**

The active substances vinclozolin, dichlofluanid and disulfoton are not supported.