The European Union (EU) welcomes the work on the discussion paper on the application of proportionality in selecting data for MRL estimation.

The EU welcomes the approach as outlined in paper CX/PR 11/43/4, i.e. utilizing supporting residue trials with application rates beyond normal ± 25 % limits by applying the principles of proportionality. The EU also supports the recommendation to only consider the method of proportionality in cases where the residue data according to GAP are not sufficient for a recommendation.

The approach, once further confirmed to provide reliable results, could help to make use of a broader data population for MRL estimate statistics. In particular MRL estimates for minor uses could tremendously benefit from making use of scaled residues since the data basis is often very small and the concomitant degree of uncertainty is very high.

It has to be noted however, that the concept should not be overstretched, meaning to limit it strictly to well defined cases as day zero data with no interfering effects like run-off or irrigation, etc. having occurred. Further constraints of applicability of the concept were mentioned by Hamilton (e.g. limit for up/down-scaling etc.) which should be strictly observed for not discrediting the concept.

In order to have a better understanding of the application of proportionality it would be very helpful to see in which substances /crops combination could be demonstrated that the approach works, as well as MRL proposals and assessments could be elaborated with and without making use of the concept of proportionality and the results could then be compared. In addition, information on the statistics which had been used should be provided. In conclusion, the EU would endorse the approach of making use of the proportionality of residues once this concept has been further explored and confirmed to provide reliable results.