European Union comments for the

CODEX COMMITTEE ON PESTICIDE RESIDUES
43rd Session

Beijing, China, 4 – 9 April 2011

Agenda Item 8 a)

Draft principles and guidance for the selection of representative commodities for extrapolation of maximum residue limits for commodity groups

CX/PR 11/43/7

European Union Competence.
European Union Vote.

General comment
In principle, the European Union (EU) agrees on the principles and guidance on the selection of representative commodities for the extrapolation of maximum residue limits for pesticides for commodity groups.

Precedence in Selection of Representative Commodities
Whereas it is straightforward that a representative commodity should contain the highest residue it appears of minor importance that it is “major in terms of production and/or consumption”; if there is really confidence in that the “worst case” is covered by the crop.

On the other hand the “ALARA principle” should not completely be ignored in the effort of covering a wide range of crops by a worst case representative crop. A reasonable balance has to be found between both requirements.

Wider extrapolations
Wider extrapolations are proposed for stone fruits or pome fruits to tropical fruits. This principal should be extended to citrus fruits on a case by case basis if necessary.

Table 1. Examples of the Selection of Representative Commodities
Table 1 presents new examples of the selection of representative commodities in the fruit groups and should be discussed in Step 3 instead of in Step 6. Last year the examples of the selection of representative commodities for the commodity groups Bulb vegetables and Fruiting Vegetables, other than Cucurbits were discussed and placed in between brackets for discussion at this Session of the CCPR.

Group 001 - Citrus fruits
The EU widely agrees that, due to a high degree of morphological similarity and genealogical kindred, group tolerances can be set. A representative data set should also encompass smaller citrus species (e.g. lemons or limes) as they will drive the MRL. An uncertainty remains as to extrapolation to very small species with narrow surface/mass ratios, like calamondin.
**Group 003 - Stone fruits**
The EU uses apricot as a representative commodity for the peaches subgroup as it was shown to be more critical in terms of residues than peaches.

**Group 005 - Assorted Tropical and Sub-Tropical Fruits – Edible Peel**
The number of representative crops per subgroup seems to be too small to cover all crops. This is due to the fact that "Other tropical fruit are less well known, but are popular in specific countries or regions of the world." In addition, the crop group and its subgroups cover "a diverse group of plants from many plant families".

Also Table olive alone as a representative commodity for the group Tropical fruits - edible peel – small does not cover this whole subgroup, because of the high oil content of this commodity. The EU would propose to include also another representative commodity for this subgroup.

**Group 006 - Assorted Tropical and Sub-Tropical Fruits – Inedible Peel**
The EU has inadequate experience regarding growth habits of this rather diverse group, but the proposed classification of commodities based on size, texture of surface etc. and edible/non-edible peel seems plausible.

The number of representative crops for some of the subgroups seems to be too small to cover all crops. This is due to the fact “Other tropical fruit are less well known, but are popular in specific countries or regions of the world”. In addition, the crop group and its subgroups cover "a diverse group of plants from many plant families".