European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES
45th Session
Beijing, China, 6 – 11 May 2013

AGENDA ITEM 6 b)
Discussion paper on principles and guidance for the use of the concept of proportionality to estimate maximum residue limits for pesticides

European Union Competence

European Union Vote

The European Union (EU) appreciates the work done by the electronic Working Group led by Australia and co-chaired by Germany on the concept of proportionality.

In general, the EU supports the use of the proportionality concept to estimate maximum residue limits for pesticides provided that the Principles and Guidance as described in paragraphs 32 to 40 of the discussion paper are respected.

The EU strongly recommends agreeing on a format for standardized data reporting.

However, the EU would like to make the following comments on the suggested Principles and Guidance:

a) The EU recommends that it is explained in paragraphs 31 and 33 on which basis the specified range of scaling factors (0.3x to 4x) was chosen.

b) The new data for dicamba show that for uses as desiccants the proportionality approach seems not a suitable approach. Therefore, it is recommended to rephrase the second sentence of paragraph 32 as follows:
"Active substances included insecticides, fungicides, herbicides, and plant growth regulators except desiccants."

c) The following sentence should be added at the end of paragraph 35:
“For additional uncertainties introduced (e.g. use of global residue data), it needs to be considered on a case-by-case basis that the overall uncertainty of the residues is not increased.”
d) The first sentence of paragraph 36 should be rephrased as follows:

"Due to insufficient data being provided for the analysis, proportionality cannot be used for post-harvest use situations at this time."

The second sentence of paragraph 36 should be deleted.

e) The proposal in paragraph 40 to include some data that are conducted according to GAP is highly appreciated. Nevertheless, the wording is rather weak and includes no options what to do. Therefore it is proposed to modify the paragraph as follows:

“The approach may be used where the data set is otherwise insufficient to make an MRL recommendation. This is where the concept provides the greatest benefit. Although the approach can be used on data sets containing 100% scaled data, some trials at GAP, at least 25%, should be conducted to evaluate the outcome."

f) The EU understands that the mentioned combinations in appendix I, table 1 follow the draft principles and guidance for use of the concept of proportionality and that all other combinations not mentioned in the table are out of the scope of the proportionality approach.