The European Union (EU) welcomes and appreciates the work done by the electronic working group led by the Netherlands and the United States on extrapolation.

The EU would like to make the following comments on Table 2 in Appendix 1 of the document.

General comment:

Residue extrapolation is a common practice that is also used in the EU to derive MRLs for crops when no residue trials are available. However, since extrapolations introduce additional uncertainties in the MRL setting process, it is preferable to limit its use to groups containing crops with a similar residue behaviour.

For example, since residue trials on bulb onions and spring onions would lead to different MRLs, respectively, it is preferable to set separate MRLs for Subgroup 009A, Bulb onions, based on the bulb onion trials and for Subgroup 009B, Green onions, based on the spring onion trials, instead of setting a group tolerance for the whole group 009 Bulb vegetables.

Column "Examples of Representative Commodities"

It is proposed to add a third footnote with the following wording:

“The use of a representative crop for extrapolation should be used for crops with similar growth stages at the time of application and with GAPs of similar phi.”

Group 13 G, Leaves of Cucurbitaceae

It is proposed to choose “pumpkin leaves” as an example of representative commodities.
Group 13 H, Baby leaves

It is proposed to state “any crop intended to use as baby leaves (harvested up to 8 true leaf stage)”.

Group 16 C, Aquatic root and tuber vegetables

It is proposed to choose “arrowhead” as an example of representative commodities.