European Union Comments

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

AGENDA ITEM 8

Discussion paper on guidance to facilitate the establishment of maximum residue limits for pesticides for minor uses and speciality crops

Mixed Competence.
European Union Vote.

The European Union and its Member States (EUMS) appreciate the work done by the electronic Working Group chaired by France and co-chaired by Kenya and Thailand on minor uses and specialty crops.

The EUMS consider that the methodology (tier 2-exercise) of the eWG which is based on statistical data of FAO/GEMS is only acceptable as a first basis for initial discussion. However, additional elements should be further considered by the eWG to further develop the current discussion paper and to refine the lists of crops in Annexes 1 and 2. The EUMS are particularly concerned about the huge discrepancy between the average consumption data which have been used as a key underlying criterion of classification and the critical large portion data, which on the contrary have been disregarded. Such a discrepancy is a source of concerns for several crops that have a high relevance for acute consumer risk and for which a reduction in the number of trials is not justified as it introduces a high degree of uncertainty.

Furthermore, the EUMS have a general reservation on the discussion paper because a number of crops considered in the discussion paper as minor crops are considered to be major crops in the EU.

The EUMS would like to make the following specific comments on issues raised in the discussion paper:

a) It is unclear whether and how a direct comparison of the EU consumption values with the population-weighted consumption figures (g/hab/day) in column 3 of Annex II is possible, as full details of the underlying data used by the eWG were not readily available.
b) Concerning the question about the number of trials required, the EUMS suggest a minimum of four trials for purposes of global harmonisation and to satisfy an absolute minimum of information for purposes of MRL setting and risk assessment.

c) Concerning the statement in the last paragraph of page 5 "In the framework of this mandate we haven’t received any national diet to refine individual consumption data“, the EUMS remind that a number of countries have sent such information in support of the GEMS/Food Programme.

d) In column “comments” of the table in Appendix 2 it is frequently mentioned “requirements to be considered by WG extrapolation group“. Therefore, the EUMS propose to consider merging both WGs in order to jointly discuss these points.