

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 6

CRD08

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

48<sup>th</sup> Session

Chongqing, P.R. China, 25-30 April 2016

#### Comments on Report on Draft and proposed draft maximum residue limits for pesticides in food and feed at steps 7 and 4, submitted by China, European Union, Ghana, Japan, Paraguay, and African Union

##### General Comment

##### China

China thanks the JMPR and appreciates the hard work for establishment of Codex MRL. China supports the advancement of the proposed MRLs as recommended by JMPR to the 5/8 steps besides some MRLs for the public health concern for the Chinese population.

##### European Union

The EU would like to **comment** that the policy for setting MRLs for crop groups based on scientific considerations needs to be elaborated. The lack of an agreed policy and the disagreement with the approach used by JMPR in 2015 leads to several EU reservations for Codex MRL proposals discussed in the 2016 CCPR.

The EU would like to **comment** that the MRLs and also the currently taken positions for propiconazole, difenoconazole, penconazole, tebuconazole and flutriafol might be revised in future, pending an evaluation of triazole derivative metabolites in the EU.

##### Paraguay

Con respecto a la lista de compuestos y productos, con los correspondientes LMR propuestos, no tenemos observaciones. Apoyamos el avance del documento, teniendo en cuenta la importancia y el interés del país en la aprobación de LMR para varios productos y principios activos de la lista.

##### Lindane (048)

##### European Union

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- cereal grains, except rice
- edible offal (mammalian)
- eggs
- meat (from mammals other than marine mammals)

The suffix (fat) should be added.

- milks
- poultry meat

The suffix (fat) should be added.

- poultry, edible offal of
- sweet corn (kernels)

### **African Union**

Lindane is currently listed in Annex A of the Stockholm convention. The 46<sup>th</sup> Session of the CCPR (2014) requested a periodic review in the 2015 JMPR to convert the CXLs into Codex EMRLs. Data from EFSA, GEMS Food program, Netherlands, USA and India were submitted for evaluation.

#### **Position:**

AU supports the advancement of the proposed draft EMRLs for cereal grains except rice, diadromous fish, edible offal (mammalian), eggs, marine fish, meat (from mammals other than marine mammals), milks, oats, poultry meat, poultry edible offal of, straw and fodder of cereal grains and sweet corn (kernels).

#### **Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

### **Chlorothalonil (081)**

### **European Union**

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- cherries
- dried ginseng
- horseradish
- onion, bulb
- peaches (including nectarines and apricots)
- peppers
- pistachio nut
- rhubarb
- root and tuber vegetables, except horseradish
- shallot

Reservation due to a difference in scientific methodology. Separate MRLs need to be set for the SDS-3701 metabolite in plant commodities.

### **African Union**

**Chlorothalonil was re-evaluated for short and long-term dietary risk assessments were conducted.**

AU supports the advancement of the proposed draft MRLs for asparagus, cherries, dried ginseng (including red ginseng), horseradish, onion bulb, peaches including nectarines and apricots, peppers, pepper chili dry, pistachio nuts, rhubarb, roots and tuber vegetables except horseradish, shallots and tomato.

#### **Justification**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Ethephon (106)****European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- apple
- cherries
- cotton seed
- edible offal (mammalian) including kidney and liver

Noting that a proposal of 0.3 mg/kg would be sufficient.

- eggs
- grapes
- mammalian fats (except milk fats)
- meat (from mammals other than marine mammals)
- milks
- olives
- pineapple
- poultry meat
- poultry, edible offal of
- poultry fats
- tomato

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities:

- barley
- rye
- wheat

Reservation due to a difference in scientific methodology. The EU applies a different residue definition for cereals, and adjustment factors could not be derived.

- fig

An insufficient number of residue trials was available for this crop in consumption category 2.

**African Union**

**Ethephon was evaluated for toxicology and residues under the periodic re-evaluation programme**

**Position:**

AU supports the advancement of the proposed draft MRLs for apples, barley, barley straw and fodder dry, cherries, cotton seeds, edible offals mammalian, eggs, figs, grapes, mammalian fats except milk fats, meat from mammals other than marine mammals, milks, olives, pineapple, poultry meat, poultry edible offal of, poultry fats, rye, rice straw and fodder dry, tomato, triticale, wheat, wheat bran, wheat germ and wheat straw and fodder dry.

**Justification:**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Phorate (112)****African Union**

**Residues data for phorate obtained from monitoring studies in spices was evaluated**

**Position:**

AU noted the observation of the JMPR meeting, that the current short and long term intake of phorate residues was unlikely to present a public health concern due to consumption of coriander seeds, fennel seeds, spice seeds except coriander seeds and fennel seeds.

**Justification:**

Since no intake concerns were noted for this compound during the estimation of the MRLs for phorate in the mentioned spices, the current assessment does not alter the outcome of the previous short and long term dietary intake.

**Cypermethrin(118)****African Union**

**Residues data for cypermethrin obtained from monitoring studies in spices was evaluated**

**Position:**

AU noted the observation of the JMPR meeting, that the current short term intake of cypermethrin residues was unlikely to present a public health concern due to consumption of cardamon seeds.

**Justification:**

Since no intake concerns were noted for this compound during the estimation of the MRLs for cypermethrin in cardamon seed, the current assessment does not alter the outcome of the previous short term dietary intake.

**Triazophos (143)****African Union**

**Residues data for triazophos obtained from monitoring studies in spices was evaluated**

**Position:**

AU noted the observation of the JMPR meeting, that the current short and long term intake of triazophos residues was unlikely to present a public health concern due to consumption of coriander seeds, cardamon seeds, fennel seeds, spice fruits and berries except cardamon.

**Justification:**

Since no intake concerns were noted for this compound during the estimation of the MRLs for triazophos in the mentioned spices, the current assessment does not alter the outcome of the previous short and long term dietary intake.

**Lambda-Cyhalothrin (146)****European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- basil
- coffee beans

The EU would like to **comment** that information available in a recent EU assessment was not available to JMPR. The toxicological reference values were recently lowered in the EU. The EU **encourages the manufacturer** to submit the relevant data in time for the planned new use evaluation in 2017.

**African Union**

Lambda-cyhalothrin was evaluated for residues and long-term dietary risk assessments were conducted.

**Position**

AU supports the advancement of the proposed draft MRLs for basil and coffee beans.

**Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

**Propiconazole (160)****European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- oats
- rye
- wheat

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities:

- barley

Reservation due to a difference in scientific methodology. The MRL proposal is based on the results of trials from which for one the result is a possible outlier. It would be appreciated if JMPR can report whether possible reasons for the extreme results were investigated.

**African Union**

This compound was re-evaluated by the 2014 JMPR as part of the periodic review program of the CCPR. The JMPR Secretariat noted the concern expressed during the 47<sup>th</sup> Session of the CCPR on the assessment of cereal data and requested re-evaluation by the 2015 JMPR.

**Position:**

AU supports the advancement of the proposed draft MRLs for barley, oats, rye, triticale and wheat.

**Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

**Profenofos(171)****African Union**

Residues data for profenofos obtained from monitoring studies in spices was evaluated.

**Position:**

AU noted the observation of the JMPR meeting, that the current short and long term intake of profenofos residues was unlikely to present a public health concern due to consumption of coriander seeds, cardamon seeds, cumin seeds, fennel seeds, spice fruits and berries except cardamon.

**Justification:**

Since no intake concerns were noted for this compound during the estimation of the MRLs for profenofos in the mentioned spices, the current assessment does not alter the outcome of the previous short and long term dietary intake.

**Abamectin (177)****European Union**

The EU **opposes to the advancement** of the proposed draft MRLs for the following commodity:

**-spinach**

An acute consumer risk has been identified by JMPR.

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities due to a difference in scientific methodology. The proposed draft MRLs are expressed on an enforcement residue definition that is not compatible with the one applicable in the EU:

**-avocado****-beans, except broad bean and soya bean (immature beans with pods)**

It is noted that the residue data indicate that according to the OECD calculator a proposed draft MRL of 0.07 mg/ kg is sufficient.

**-beans, dry****-blackberries****-celery**

The crop code assigned to the proposed MRL for celery should be changed to VX 0624 (VX 0578 does not exist; VR 0578 refers to celeriac).

**-cherries**

It is noted that the residue data indicate that according to the OECD calculator a proposed draft MRL of 0.06 mg/ kg is sufficient.

**-citrus fruits**

Due to the limited number of trials, it is not possible to conclude on similar residue behaviour for the different citrus crops. Therefore the trial data can only be used to set an MRL for oranges. Furthermore in the JMPR Report and Summary Report for citrus fruits erroneously an MRL of 0.2 mg/kg was reported.

**-cotton seed****-cucumber**

No information is provided in the JMPR Report in which countries and in which season the trials were performed.

**-egg plant****-garlic**

No Codex MRL should be set for garlic as no GAP is reported.

**-gherkin**

The MRL proposal derived by JMPR was 0.03 mg/kg and not 0.05 mg/kg as erroneously reported in the JMPR Report and Summary Report.

**-grapes****-hops, dry****-leek****-lettuce, head****-mango****-melons, except watermelon****-onion, bulb****-papaya****-peaches****-peanut**

**-peppers, sweet**

No information is provided in the JMPR Report in which countries and which season the trials were performed. If the trials were not performed under the most critical conditions (indoor winter period) where low photodegradation is expected, the MRL proposals may not be sufficient.

**-plums (including prunes)**

The residue data indicate that according to the OECD calculator a proposed draft MRL of 0.007 is appropriate for plums.

**-pome fruits****-potato****-raspberry, red, black****-rice**

The MRL proposal was derived for rice, husked (CM 0649) and not for the crop code GC 0649.

**-shallot****-strawberry****-sweet potato****-tomato**

No information is provided in the JMPR Report in which countries and which season the trials were performed. If the trials were not performed under the most critical conditions (indoor winter period) where low photodegradation is expected, the MRL proposals may not be sufficient.

**-tree nuts****-yams**

The EU would like to comment that for **raisins** the source of the MRL proposal is unclear as on p. 41 of the JMPR Report an MRL proposal of 0.03 mg/kg was reported for dried grapes.

**Ghana**

**Position:** Due to short term dietary intake concerns in children aged 1-5, Ghana wishes to express a reservation on the advancement of proposed MRLs for Abamectin in spinach

We however support the advancement of proposed MRLs for the other commodities almond hulls, beans except broad beans and soya beans, beans dry, celery, cherries, citrus fruits, cotton seeds, cucumber, eggplant, garlic, gherkin, grapes, dry grapes (except currants, raisins and sultanas), grape juice, hops dry, leeks, lettuce head, mango, melon, onion bulb, papaya, peaches, peanuts, pepper chili, pepper sweet, plums (including prunes), pome fruits, potato, raisins, raspberry red and black, rice, rice straw, shallots, strawberry, sweet potato, tomato, tree nuts and yams.

**African Union**

At the 2015 JMPR, Abamectin was evaluated for toxicology and residues under the periodic re-evaluation programme.

**Position:**

AU wishes to express a reservation on the advancement of proposed MRLs for Abamectin in spinach due to short term dietary intake concerns in Children aged 1-5.

However AU supports the advancement of proposed MRLs for the other commodities almond hulls, beans except broad beans and soya beans, beans dry, celery, cherries, citrus fruits, cotton seeds, cucumber, eggplant, garlic, gherkin, grapes, dry grapes (except currants, raisins and sultanas), grape juice, hops dry, leeks, lettuce head, mango, melon, onion bulb, papaya, peaches, peanuts, pepper chili, pepper sweet, plums (including prunes), pome fruits, potato, raisins, raspberry red and black, rice, rice straw, shallots, strawberry, sweet potato, tomato, tree nuts and yams.

**Justification:**

Fruits and vegetables make an important part in the African diet. In the evaluation spinach data evaluated revealed public health concerns due to the exceedance of the acute reference dose by 140% which is not acceptable.

However, there are no short or long term intake concerns noted in the proposed MRLs for the other commodities.

**Bifenthrin (178)****China**

Considering the bifenthrin's short-term intake for celery of Chinese children and China maintains is 600 % and 360% of the ARfD, China maintains reservation on the proposed these MRLs .

**European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- blueberries
- grapes
- peas (pods and succulent=immature seeds)
- peas, shelled

The EU opposes the advancement of the proposed draft MRLs for the following commodities:

- lettuce, head
- celery

An acute consumer risk has been identified for a European consumer group. JMPR also noted an exceedance of the ARfD.

The EU would like to comment that the manufacturer should make a commitment to submit data for strawberries; otherwise the proposed CXL of 3 mg/kg should be withdrawn.

**Ghana**

Position: We note JMPR's reevaluation of bifenthrin for residues; short and long-term dietary risk assessments. The JMPR evaluation indicates the exceedance of the percentage acute reference dose by 360 – 600% for short term intake for the consumption of celery; and 190 – 430% head lettuce for the general population and children respectively. This raises short term intake concerns hence Ghana wishes to express a reservation on the advancement of the draft MRLs for celery and head lettuce.

**Japan**

Japan does not support advancement of the proposed draft MRL for head lettuce, due to potential health concern to children. The short-term dietary intake calculated for children of 1 to 6 years of age using the consumption data of head lettuce in Japan is 260% of the ARfD.

The JMPR noted in its 2015 report that "on the basis of information provided to the JMPR it was concluded that the estimated short-term intake of bifenthrin for the consumption of head lettuce and celery may present a public health concern".

**African Union**

Bifenthrin was re-evaluated for residues; short and long-term dietary risk assessments were also conducted.

**Position**

AU supports the advancement of the proposed draft MRLs for grapes, blueberries and peas (pods and succulent immature seed). However, AU wishes to express a reservation on their advancement of draft MRLs for celery and head lettuce. This is due to short term intake concerns for these concerns.

**Justification**

The evaluation indicates the exceedance of the percentage acute reference dose by 360 – 600% for short term intake for the consumption of celery; and 190 – 430% head lettuce and for general population and children respectively.

**Penconazole (182)****European Union**

The EU reserves its position, pending the outcome of an evaluation of triazole derivative metabolites in the EU.

**African Union**

The compound was evaluated for toxicology under periodic review program by the 2015 JMPR.

**Position:**

AU has noted the outcome of the toxicological evaluation and the establishment of the acute reference dose and acceptable daily intake for both the parent compound and its metabolites of significant importance.

**Tebuconazole (189)****European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- asparagus
- banana
- cucumber
- ginseng, dried including red ginseng
- onion, bulb
- shallot
- spring onion

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodity:

- sunflower seed

Reservation based on a difference in scientific methodology. The residue data indicate that according to the OECD calculator a proposed draft MRL of 0.06 mg/ kg is sufficient for sunflower seed.

**African Union**

Tebuconazole was last evaluated in 2011 in the periodic review program. The 2015 JMPR conducted a follow-up evaluation for additional residue data.

**Position:**

AU supports the advancement of the proposed draft asparagus, banana, cucumber, ginseng, ginseng extract, ginseng dry including red ginseng, onion bulb, shallots, spring onions and sunflower seeds.

**Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

**Imidacloprid (206)****European Union**

The EU **reserves its position**, pending the outcome of an ongoing review of all existing MRLs and of the residue definition in the EU.

- olives for oil production
- table olives
- basil

No specific comments.

- plums

The current CXL for plums including prunes should be withdrawn.

- kale

An acute consumer risk has been identified for a European consumer group. The exceedance results from the use of the lower EU ARfD and the higher EU variability factor.

- cherries
- peaches
- soya bean (dry)
- tea, green, black

The MRL proposals are based on the results of trials from which for one or several the result is a possible outlier. It would be appreciated if JMPR can report whether possible reasons for the extreme results were investigated.

**African Union**

**Imidacloprid was evaluated for residues and long-term dietary risk assessments Were conducted.**

**Position**

AU supports the advancement of the proposed draft MRLs for basil, cherries, prunes, kale, olives for oil production, peaches (including nectarines and apricots), plums (including prunes), soya bean (dry), soya bean fodder, table olives and tea, green, black (black, fermented and dried).

**Justification:**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Cyprodinil (207)****European Union**

The EU **supports the advancement** of the proposed draft MRL for the following commodity:

- rape seed

**African Union**

**Cyprodinil was evaluated for residues and long-term dietary risk assessments were conducted.**

**Position:**

AU supports the advancement of the proposed draft MRLs for rape seed.

**Justification:**

There were no long term intake concerns noted for this compound.

**Trifloxystrobin (213)****European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- beans, dry
- lentils
- pea, dry
- soya bean

Noting that the existing codex MRLs for liver and meat of cattle, goats, pigs and sheep would need to be reconsidered because the calculated dietary burden exceeds the highest feeding level of the ruminant feeding study and therefore the existing CXLs for animal products need to be reconsidered. The setting of new CXLs for feed items is not acceptable if it is not possible to derive MRLs for livestock. Furthermore the IEDI calculation should be corrected taking into account also polished rice in the exposure calculation.

**African Union**

Trifloxystrobin was first evaluated in 2004 and was listed in the 46<sup>th</sup> Session of the CCPR for the evaluation of the 2015 JMPR for additional MRLs.

**Position:**

AU supports the advancement of the proposed draft MRLs for beans dry, lentils, pea dry and soya beans.

**Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

**Difenoconazole (224)****European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- avocado
- rape seed
- soya bean (dry)
- peanut

In all trials the residues were below the LOQ of 0.01 mg/kg. The EU notes that the MRL value of 0.1\* mg/kg in the JMPR Summary Report and the Circular Letter is not correct, but that the value of 0.01\* mg/kg in the JMPR Report is correct.

**African Union**

**Difenoconazole was evaluated for residues and long-term dietary risk assessments Were conducted.**

**Position:**

AU supports the advancement of the proposed draft MRLs for avocado, peanuts, rape seed and soya beans dry.

**Justification:**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Pyrimethanil (226)****European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- blackberries
- blueberries
- cucumber
- raspberries

**Spirotetramat (234)****European Union**

The EU reserves its position, pending the outcome of an ongoing review of the residue definition in the EU.

- avocado
- sweet corn

No specific comments.

- guava

Since the MRL proposal was derived using the proportionality principle, the EU considers that in line with the "Principles and Guidance for Application of the Proportionality Concept for Estimation of Maximum Residue Limits for Pesticides", the inclusion of trials with a divergent PHI is not acceptable.

On page 326 of the JMPR Report the last sentence (conclusion on the short-term intake) is truncated.

**African Union**

The 2015 JMPR evaluated the compound for additional MRLs.

**Position:**

AU supports the advancement of the proposed draft MRLs for avocado, guava and sweet corn.

**Justification:**

There were no short term dietary intake concerns noted for this compound to present public health concerns.

**Fluopyram (243)****European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodities:

- beans (green pods and immature seeds)
- beans shelled
- cotton seed
- eggs
- kidney of cattle, goats, pigs and sheep
- liver of cattle, goats, pigs and sheep
- meat (from mammals other than marine mammals)
- milks
- peas shelled
- edible offal of poultry
- poultry meat

**-soya bean (dry)**

Noting that based on an updated dietary burden calculation MRLs of 0.9 mg/kg, 0.6 mg/kg and 0.4 mg/kg would be sufficient for respectively eggs, meat from mammals and milks.

**African Union**

**Fluopyram was evaluated for residues and long-term dietary risk assessments were conducted.**

**Position:**

AU supports the advancement of the proposed draft MRLs for beans except broad beans and dry beans, beans shelled, cotton seeds, eggs, kidney of cattle, goats, pigs, and sheep; liver of cattle, goats, pigs, and sheep, meat (from mammalian other than marine mammals), milks, peas shelled, pea hay or pea fodder dry, poultry edible offal of, poultry meat, soya bean (dry).

**Justification:**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Acetamiprid (246)****China**

Considering the acetamiprid's short-term intake for mustard greens of Chinese children and China maintains is 490 % and 200% of the ARfD, China maintains reservation on the proposed these MRLs.

**European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- asparagus
- cucumber
- edible offal (mammalian)
- fruiting vegetables, cucurbits (except cucumber)
- mammalian fats (except milk fats)
- meat (from mammals other than marine mammals)
- milks

Noting that a proposal of 0.15 mg/kg would be sufficient.

- sweet corn (corn-on-the-cob)

The EU **opposes the advancement** of the proposed draft MRLs for the following commodities:

- mustard greens

An acute consumer risk has been identified for a European consumer group. JMPR also noted an exceedance of the ARfD.

**Ghana**

Position: We note that Acetamiprid was evaluated for residues and long-term dietary risk assessments by JMPR. Ghana does not support the advancement of the proposed MRLs for Acetamiprid in mustard greens due to short term dietary intake concerns in some populations.

We however support the advancement of proposed MRLs for fruiting vegetables cucurbits (except cucumber), fruiting vegetables other than cucurbits (tomato), sweet corn (corn on the cob), mammalian fats other than marine mammals, meat from mammalian mammals other than marine mammals, mammalian fats except milk fats, asparagus, edible offal's mammalian, sweet corn Stover and milk.

## **African Union**

Acetamiprid was evaluated for residues and long-term dietary risk assessments were conducted.

### **Position:**

AU wishes to express a reservation on the advancement of proposed MRLs for Acetamiprid in Mustard greens due to short term dietary intake concerns in some populations.

AU however supports the advancement of proposed MRLs for fruiting vegetables cucurbits (except cucumber), fruiting vegetables other than cucurbits (tomato), sweet corn (corn on the cob), mammalian fats other than marine mammals, meat from mammalian mammals other than marine mammals, mammalian fats except milk fats, asparagus, edible offal's mammalian, sweet corn Stover and milk.

### **Justification**

The evaluation indicates the exceedance of the percentage acute reference dose by 200 to 490% for short term intake for the consumption of mustard greens for general population and children respectively.

## **Flutriafol (248)**

### **China**

Considering the flutriafol's short-term intake, lettuceleaf for Chinese children and China maintains is 360 % and 120% of theARfD, spinach for China maintains is150% of the ARfD, mustard greens for China maintains is 140% of the ARfD, China maintains reservation on the proposed these MRLs.

## **European Union**

The EU **opposes the advancement** of the proposed draft MRLs for the following commodities:

- **lettuce, leaf**
- **mustard greens**
- **spinach**

An acute consumer risk has been identified for a European consumer group. JMPR also noted an exceedance of the ARfD.

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- **brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas**

An acute consumer risk has been identified for a European consumer group for cauliflower. The exceedance results from the higher EU variability factor. The EU notes the lack of an agreed policy for pooling data (see also general comment on setting MRLs for crop groups).

- **celery**

An acute consumer risk has been identified for a European consumer group. The exceedance results from the higher EU variability factor.

- **edible offal (mammalian)**
- **eggs**
- **mammalian fats (except milk fats)**
- **meat (from mammals other than marine mammals)**
- **milks**
- **poultry fats**
- **poultry meat**
- **poultry, edible offal of**

The EU could not reproduce the dietary burden calculation.

- **fruiting vegetables, cucurbits**

The EU notes the lack of an agreed policy for pooling data (see also general comment on setting MRLs for crop groups). The data would be sufficient to derive separate MRLs for each crop (0.3 mg/kg for melons and 0.15 mg/kg for cucumbers and summer squash).

**- peppers (subgroup including peppers, chili and peppers sweet)**

Instead of setting a group MRL, the EU considers it more appropriate to set an additional MRL for chilli peppers at the level of 0.7 mg/kg. The existing MRL for sweet pepper would also cover the US GAP (4 x128 g ai/ha, 0d PHI), since the new US trials result in an MRL proposal of 0.9 mg/kg).

**- pome fruits**

The EU could not reproduce that the additional applications do not have an impact on the terminal residue, because the relevant decline studies are not reported in the JMPR Report.

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- cherries
- cotton seed
- lettuce, head
- maize
- peaches including nectarines and apricots
- plums (including prunes)
- rape seed
- sorghum
- strawberry
- sugar beet
- tomatoes

The EU would like to **comment** that the residue definition for animal products should be reconsidered, considering that the dietary burden resulting from the uses that were assessed in 2011 and 2015 may be significantly higher.

### **Japan**

Japan does not support advancement of the proposed draft MRL for spinach, due to potential health concern to children. The short-term dietary intake calculated for children of 1 to 6 years of age using the consumption data of spinach in Japan exceeded the ARfD.

The JMPR noted in its 2015 report that "on the basis of information provided to the JMPR, the Meeting concluded that the short-term intake of residues of flutriafol from consumption of leaf lettuce, mustard greens and spinach may present a public health concern".

### **African Union**

**Flutriafol was evaluated for residues and long-term dietary risk assessments were conducted.**

**Position:**

AU supports the advancement of the proposed draft MRLs for brassica (cole or cabbage vegetables, head cabbage, flower head brassica, celery, cherries, cotton seed, edible offal (mammalian), eggs, fruiting vegetables cucurbits, lettuce head, maize, maize fodder dry, mammalian fats (except milk fats), meat (from mammals other than marine mammals), milks, peaches including nectarines and apricots, peppers (subgroup including pepper chili and peppers sweet), pomefruits, poultry fats, poultry meat, poultry edible offal of, rape seed, sorghum, sorghum straw and fodder dry, strawberry, sugar beet, sugarbeet leaves or tops and tomato.

However, AU wishes to express a reservation for the advancement of the proposed draft MRLs of leaf lettuce, spinach and mustard greens.

AU further seeks clarification on the proposed MRLs for plums (including prunes) at 0.4mg/kg and prunes at 0.9mg/kg since it seems that the prunes MRL would be covered by the subgroup MRL for plums (including prunes).

**Justification:**

There were no intake concerns noted for this compound. However, the short term intake concern is due to the exceedance of the acute reference dose by 120 – 490 % for some populations.

**Fluxapyroxad (256)**

**European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- cherries
- cotton seed
- grapes
- lettuce, head
- peaches (including nectarine and apricots)
- plums (including prunes)
- radish
- sorghum
- tree nuts

The EU **opposes the advancement** of the proposed draft MRLs for the following commodities:

- spinach

An acute consumer risk has been identified for a European consumer group. JMPR also noted an exceedance of the ARfD.

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

- banana

The EU applied a different scientific methodology. The EU considers that the transfer to the edible part is not completed on the day of the pesticide treatment, and that residue trials with 0 d PHI are hence not sufficiently reliable to estimate the expected residues for risk assessment.

- berries and other small fruit (except grapes)

The EU applied a different scientific methodology as regards the pooling of trials on different berries and the extrapolation to other berries.

- brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas

The EU applied a different scientific methodology as regards the pooling of trials.

- brassica leafy vegetables

The EU applied a different scientific methodology as regards the extrapolation from mustard greens.

- carrot

The EU notes that more than 5 trials are appropriate at Codex level. Moreover, the EU also has a different policy as regards data requirements for major crops.

- celery

The EU applied a different scientific methodology. An acute consumer risk has been identified for a European consumer group. The exceedance results from a different policy of rounding for the ARfD.

- fruiting vegetables, cucurbits

The EU has a different policy as regards data requirements for major crops such as melons and cucumbers.

- garlic

See explanation for onion (bulb) (MRL for garlic is extrapolated from onions).

**- onion (bulb)**

The EU notes that more than 5 trials are appropriate at Codex level. Moreover, the EU also has a different policy as regards data requirements for major crops.

**- oranges, sweet, sour**

The EU could not reproduce whether the trials with data on the edible portion are representative for the most critical residue situation (i.e. representative for the trials with the highest residues).

**- parsnip**

See explanation for carrots (MRL for parsnips is extrapolated from carrots).

**- rice husked**

The EU could not reproduce the derivation of the processing factor from rice.

**- shallot**

See explanation for onion (bulb) (MRL for shallot is extrapolated from onions).

### **Ghana**

Position: Fluxapyroxad was evaluated for residues and long-term dietary risk assessments were conducted. We support the advancement of the proposed draft MRLs for banana, berries and other small fruits (except grapes), brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas, brassica leafy vegetables, carrot, celery, cherries, cotton seed, dried grapes (currants, raisins and sultanas), fruiting vegetables, cucurbits, garlic, grapes, grape pomace, dry, lettuce, head, onion (bulb), oranges, sweet, sour, parsnip, peaches (including nectarine and apricots), plums (including prunes), radish leaves (including radish tops), radish, rice, rice, husked, rice, polished, rice straw and fodder, dry (dry Weight), shallot, sorghum, sorghum straw and fodder, dry (dry Weight), stone fruits and tree nuts.

However, we wish to express a reservation for the advancement of the proposed draft MRLs of spinach which was found to exceed the acute reference doses by 190%.

### **African Union**

**Fluxapyroxad was evaluated for residues and long-term dietary risk assessments Were conducted.**

**Position:**

AU supports the advancement of the proposed draft MRLs for banana, berries and other small fruits (except grapes), brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas, brassica leafy vegetables, carrot, celery, cherries, cotton seed, dried grapes (currants, raisins and sultanas), fruiting vegetables, cucurbits, garlic, grapes, grape pomace, dry, lettuce, head, onion (bulb), oranges, sweet, sour, parsnip, peaches (including nectarine and apricots), plums (including prunes), radish leaves (including radish tops), radish, rice, rice, husked, rice, polished, rice straw and fodder, dry (dry Weight), shallot, sorghum, sorghum straw and fodder, dry (dry Weight), stone fruits and tree nuts.

However, AU wishes to express a reservation for the advancement of the proposed draft MRLs of spinach.

**Justification:**

There were no long term intake concerns noted for this compound. However, the short term intake concern is due to the exceedance of the acute reference dose by 190 %.

**Cyantraniliprole (263)****European Union**

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities:

**-cotton seed**

Reservation due to a difference in scientific methodology. The MRL proposal is based on the results of 13 trials from which for one the result is a possible outlier. It would be appreciated if JMPR can report whether possible reasons for the extreme results were investigated.

**-milks**

Reservation due to a difference in scientific methodology. A long term health risk was identified for European consumers because the EU ADI is only 1/3 of the JMPR ADI and because the specifically high consumption of milk for children is not considered in the cluster diets used for the IEDI calculations.

**-rapeseed**

Reservation due to a difference in scientific methodology. The MRL proposal is based on the results of 16 trials from which for one the result is a possible outlier. It would be appreciated if JMPR can report whether possible reasons for the extreme results were investigated.

**-sunflower seed**

Reservation due to a difference in scientific methodology. The MRL proposal is based on the results of 9 trials from which for one the result is a possible outlier. It would be appreciated if JMPR can report whether possible reasons for the extreme results were investigated.

The EU supports the advancement of the proposed draft MRLs for the following commodities:

**-common bean (pods and/or immature seeds)****-beans, shelled**

Noting that the proposal was derived by extrapolation from peas but that pooling of the data on peas and beans would result in a slightly lower MRL of 0.2 mg/kg.

**-beans, dry****-citrus****-coffee beans****-edible offal (mammalian)****-eggs****-maize**

Noting that the MRL should be labelled with an asterisk.

**-mammalian fat (except milk fats)****-meat (from mammals other than marine mammals)****-peas (pods and succulent seeds)****-peas, shelled (succulent seeds)****-pomegranate****-poultry, edible offal of****-poultry fat****-poultry meat****-soybean, immature seed****-soya bean (dry)****-tree nuts**

**African Union**

**Cyantraniliprole was evaluated for new uses for certain commodities.**

**Position:**

AU supports the advancement of the proposed draft MRLs for common beans pods and or immature seeds, beans shelled, beans dry, beans fodder dry matter, citrus, citrus oil edible, coffee beans, cotton seed, edible offal mammalian, eggs, maize, mammalian fats except milk fats, meat from mammals other than marine mammal, milk, peas (pods and succulent immature seeds), peas pods succulent, pea hay or pea fodder dry, pomegranate, poultry edible offal, poultry fat, poultry meat, rape seed, soya beans immature seed, soya beans dry, soya beans fodder dry matter, sunflower seeds and tree nuts.

**Justification**

There are no long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Imazapic (266)****European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

- soya bean (dry)

**African Union**

Imazapic was evaluated by the 2013 JMPR for the first time for toxicology and for residues. However, at the time of the 2013 JMPR, the data received was for transgenic soya beans. Imazapic was included in the priority list by the 46<sup>th</sup> Session of the CCPR in 2014 for evaluation for additional MRLs for the 2015 JMPR. The 2015 JMPR received information on the registration of the compound for application on soya beans cultivars tolerant to imidazolinone herbicide.

**Position:**

AU supports the advancement of the proposed draft MRLs for soya bean (dry).

**Justification:**

The MRL is unlikely to cause long and short term dietary intake concerns noted for this compound to present public health concerns.

**Imazapyr (267)****European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

-edible offal mammalian

-soya bean (dry)

**African Union**

Imazapyr was evaluated by the 2013 JMPR for the first time for toxicology and for residues. However at the time of the 2013 JMPR, no GAP had been approved for soya beans, hence due to the lack of an approved GAP the 2013 JMPR could not estimate an MRL for soya beans. The 2015 JMPR received information on soya beans to support the estimation of MRLs for soya beans and grasses.

**Position:**

AU supports the advancement of the proposed draft MRLs for edible offal (mammalian), hay or fodder (dry) of grasses; and soya beans (dry).

**Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

**Acetochlor (280)****European Union**

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities:

The EU applied a different scientific methodology. For t-norchloro acetochlor, the EU could not exclude genotoxic and carcinogenic properties on the basis of the available data. The EU did not extrapolate the toxicity profile of the parent and its reference values to other metabolites.

- barley
- buckwheat
- millet
- oats
- peas (dry)
- potato
- rye
- sugar beet
- sunflower seed
- sweet corn (corn on the cob)
- wheat
- wild rice

No specific comments.

- beans, except broad bean and soya bean
- broad bean (dry)
- chick-pea (dry)
- edible offal (mammalian)
- eggs
- lentil (dry)
- lupin (dry)
- mammalian fats (except milk fats)
- meat (from mammals other than marine mammals)
- milks
- poultry fats
- poultry meat
- poultry, edible offal of

The EU could not reproduce the MRL proposal.

- maize

Noting that the LOQ of these trials (0.002 mg/kg for the total residues, expressed as parent equivalent) were significantly lower than the LOQs for the trials in cereals and lower than the lowest validation level of the method used for the analysis of the trials (ES-ME-1001-02).

**African Union**

Acetochlor was evaluated for toxicology and residues for the first time by the JMPR.

**Position:**

AU supports the advancement of the draft MRLs for the various commodities since there are no long or short term intake concerns. The proposed MRLs are for barley, barley straw and fodder dry, beans except broad beans and soya beans, broad beans dry, buckwheat, buckwheat fodder, chick pea dry, edible offal mammalian, eggs, hyacinth bean dry, legume animal feeds, lentil dry, lupin dry, maize, mammalian fats except milk fats, meat, meat from mammals other than marine mammals, milks, millets, millet fodder dry, oat straw and fodder dry, oats, peas dry, pigeon pea dry, potato, poultry fats, poultry meat, poultry edible offal of, rye, rye straw and fodder dry, sugar beet, sugar beet leaves or tops, sugar beet molasses, sugar beet pulp dry, sunflower seed, sweet corn (corn-on-the-cob), sweet corn fodder, teosinte, teosinte fodder, triticale, wheat, wheat straw and fodder dry and wild rice.

**Justification:**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Cyazofamid (281)****European Union**

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

**-beans, except broad bean and soya bean**

**-egg plant**

**-fruiting vegetables and cucurbits.**

The EU notes the lack of an agreed policy for pooling data (see also general comment on setting MRLs for crop groups). Considering that cucumbers are a major crop according to the agreement on minor crops classification, the number of trials would not be sufficient to derive an individual MRL. Also for summer squash and melons one additional trial would be required, respectively, to derive an MRL proposal.

**-grapes**

**-hops, dry**

**-potato**

**-tomato**

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

**-beans, shelled**

It should be clarified whether the results of the trials on lima beans refer to the immature beans or the young pods. If the latter is the case, the EU considers the MRL proposal for beans shelled not appropriate (the residues in the pods are expected to be higher than in immature seed).

**-brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas.**

Reservation due to a difference in scientific methodology. The EU notes the lack of an agreed policy for pooling data (see also general comment on setting MRLs for crop groups). and that the U-test indicated that there is no significant difference. Sufficient data are available to derive an MRL of 1.5 mg/kg for cabbage. Although the number of trials would be sufficient to derive an MRL for broccoli, it should be verified whether the US GAP actually comprises flowerhead cabbages. If this is not the case, the EU considers the setting of an MRL for broccoli not appropriate.

**-brassica leafy vegetables**

Reservation due to a difference in scientific methodology. An acute consumer risk has been identified for a European consumer group. The differences between the EFSA and JMPR assessments are due to the JMPR differentiation of HRs for raw versus processed commodities and due to differences in consumption data and processing factors.

**-leafy vegetables (except brassica leafy vegetables)**

Reservation due to a difference in scientific methodology. An acute consumer risk has been identified for a European consumer group. The differences between the EFSA and JMPR assessments are due to the JMPR differentiation of HRs for raw versus processed commodities and due to differences in consumption data and processing factors. Furthermore the EU does not consider it appropriate to set the MRL based on trial data for spinach only. Sufficient trials are available to set separate MRLs of 4 mg/kg, 8 mg/kg and 10 mg/kg for head lettuce, leaf lettuce and spinach, respectively.

**-peppers, sweet (including pimento or pimienta)**

Insufficient trials on sweet peppers are available to allow deriving an MRL proposal.

**-peppers, chili**

Insufficient trials on chili peppers are available to allow deriving an MRL proposal.

**African Union**

**Cyazofamid was evaluated for toxicology and residues for the first time by the JMPR 2015.**

**Position:**

AU supports the advancement of the proposed draft MRLs for beans except broad beans and soya beans, beans shelled, brassica (cole or cabbage vegetables), brassica vegetables, head cabbage, flower head brassica, brassica leafy vegetables, eggplant, fruiting vegetable cucurbits, grapes, hops dry, leafy vegetables except brassica leafy vegetables, pepper sweet including pimento or pimienta, pepper chili, potato and tomato.

**Justification**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

**Flonicamid (282)**

**European Union**

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for commodities of plant origin, because the residue definitions for enforcement and for risk assessment in the EU include the metabolites TNFG and TNFA and are hence broader than the corresponding residue definitions derived by JMPR that contain only the parent compound. Proposed Codex MRLs for commodities of plant origin cannot be taken over in the EU legislation, because they would underestimate the residues compliant with the EU residue definitions.

- almonds
- cherries
- cotton seed
- fruiting vegetables, other than cucurbits (except mushrooms and sweet corn)
- hops, dry
- lettuce, head
- mints
- peaches (including nectarine and apricots)
- pecan
- radish
- radish leaves
- rape seed

No specific comments.

- brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas

The EU notes the lack of an agreed policy for pooling data (see also general comment on setting MRLs for crop groups). For broccoli, the number of trials would be sufficient to derive a separate MRL (1.5 mg/kg), while for cabbage with wrapper leaves an MRL of 3 mg/kg would be derived. An acute consumer risk has been identified for a European consumer group for cabbage, broccoli and cauliflower. In contrast to JMPR, the EU assessment considered the setting of an ARfD necessary, based on a different view on the same study.

**- brassica leafy vegetables**

An acute consumer risk has been identified for a European consumer group for kale and Chinese cabbage. In contrast to JMPR, the EU assessment considered the setting of an ARfD necessary, based on a different view on the same study. On p.173 of the JMPR report erroneously the value of 8.31 mg/kg is reported as STMR; in fact the STMR is 4.59 mg/kg, while 8.31 mg/kg is the HR. The code VL 0054 (brassica leafy vegetables) would also cover radish leaves (VL 0494). Since a specific MRL was derived for radish leaves, this crop should be excluded (i.e. Brassica leafy vegetables, except radish leaves).

**- celery**

**- lettuce, leaf**

**- spinach**

An acute consumer risk has been identified for a European consumer group. In contrast to JMPR, the EU assessment considered the setting of an ARfD necessary, based on a different view on the same study.

**- fruiting vegetables, cucurbits**

The EU notes the lack of an agreed policy for pooling data (see also general comment on setting MRLs for crop groups). The EU does not consider it appropriate to pool data of trials reflecting different GAPs, nor of trials from different geographical zones. The number of trials is insufficient for the major crops (i.e. cucumber, melons) for the individual GAPs, and extrapolation from an incomplete data set to other crops is considered not acceptable. An acute consumer risk has been identified for a European consumer group for melons. In contrast to JMPR, the EU assessment considered the setting of an ARfD necessary, based on a different view on the same study.

**- low growing berries**

The EU applied a different scientific methodology as regards the extrapolation to other berries.

**- plums (including prunes)**

The EU notes that more than 5 trials are appropriate at Codex level. Moreover, the EU also has a different policy as regards data requirements for major crops.

**- pome fruits**

The EU does not consider it appropriate to set a group MRL, because the trials were conducted according to a GAP for apples but not for pears.

**- potatoes**

It is noted that the residue data indicate that according to the OECD calculator a proposed draft MRL of 0.02 mg/ kg is appropriate.

The EU would like to **comment** that for commodities of animal origin, the JMPR residue definition is comparable with the EU residue definition. However, the wording of the JMPR residue definition presented in the JMPR Summary Report and in Annex I of the JMPR Report does not accurately reflect the residue definition presented on page 168 of the JMPR Report and should therefore be corrected to "Flonicamid and the metabolite TFNA-AM, expressed as parent".

The EU **supports the advancement** of the proposed draft MRLs for the following commodities:

**- edible offal (mammalian)**

The EU introduces a **reservation to the advancement** of the proposed draft MRLs for the following commodities:

**- eggs**

- poultry fats
- poultry meat (including pigeon meat)
- poultry, edible offal of

The results of the dietary burden calculation presented on p. 178 of the JMPR Report do not correspond with the results presented in Annex 6. The calculations should be verified; it also needs to be verified that all products relevant for livestock have been included in the calculation (e.g. cotton, wheat, potatoes, etc.).

- mammalian fats
- meat (from mammals other than marine mammals)
- milks

The dietary burden calculation performed by JMPR should be verified. Kale was not considered in this calculation, although an MRL proposal was derived for the Brassica leafy vegetables subgroup, which includes kale. For milks, an inconsistency was noted regarding the max dietary burden for dairy cattle reported on p. 178 of the JMPR report (US/CAN: 0.81 ppm, EU 0.82 ppm, AU: 2.38 ppm, JAP: 0.002 ppm) and the values reported in Annex 6 (US/CAN: 0.033 ppm, EU 1.721 ppm, AU: 0,016 ppm, JP:0.003 ppm).

### African Union

**Flonicamid was evaluated for toxicology and residues for the first time by the JMPR.**

#### Position:

AU supports the advancement of the proposed draft MRLs for almonds, brassica (cole or cabbage vegetables), head cabbage, flower head brassica, brassica leafy vegetables, celery, cherries, cotton seed, edible offals (mammalians), eggs, fruiting vegetables cucurbits, fruiting vegetables other than cucurbits except mushrooms and sweet corn, hops dry, lettuce head, lettuce leaf, low growing berries, mammalian fats, meat from mammals other than marine mammals, milks, mint, miscellaneous fodders and fodder crops (fodder), peaches (including nectarines and apricots), pecan, plums (including prunes), pome fruits, potatoes, poultry fats, poultry meat (including pigeon meat), poultry edible offals, radish, radish leaves, rape seeds, spinach, straw, fodder and forage of cereal grains and grass (including buck wheat fodder)(forage), straw fodder and forage of cereal grains and grasses (including buck wheat fodder)(straw and fodder dry), tomato paste and wheat.

#### Justification:

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

### Fluazifop-P-butyl (283)

#### European Union

No comment.

### Flumioxazin (284)

#### European Union

The EU **reserves its position**, pending the outcome of the ongoing periodic re-evaluation in the EU.

- artichoke, globe
- asparagus
- beans (dry)
- bush berries
- cabbages, head
- edible offal (mammalian)
- eggs
- fruiting vegetables, cucurbits

- fruiting vegetables, other than cucurbits (except mushrooms and sweet corn)
- grapes
- lentil (dry)
- lupin (dry)
- maize
- mammalian fats (except milk fats)
- meat (from mammals other than marine mammals)
- milks
- olives
- onion (bulb)
- peanut
- peas (dry)
- pome fruits
- pomegranate
- potato
- poultry fats
- poultry meat
- poultry, edible offal of
- soya bean (dry)
- stone fruits
- sunflower seed
- sweet potato
- tree nuts
- wheat

No specific comments.

- cotton seed
- mints

Noting that the MRLs should be labelled with an asterisk, indicating them as LOQ, considering the results of the trials and the limit of quantification of the analytical methods.

### **African Union**

**Flumioxazin was evaluated for toxicology and residues for the first time by the 2015 JMPR.**

#### **Position:**

AU supports the advancement of the proposed draft MRLs for alfalfa fodder, artichoke globe, asparagus, beans dry, bush berries, cabbage head, chick peas dry, cotton seed, edible offal mammalian, eggs, fruiting vegetables cucurbits, fruiting vegetables other than cucurbits (except sweet corn and mushrooms), grapes, lentils dry, lupin dry, maize, maize fodder, mammalian fats (except milk fats), meat (mammalian other than marine mammals), milks, mints, olives, onion bulb, peanut, peas dry, pome fruits, pomegranates, potatoes, poultry fats, poultry meats, poultry edible offal of, soy beans, stone fruits, sunflower seeds, sweet potatoes, tree nuts, wheat, wheat hay, wheat straw and fodder dry.

#### **Justification:**

There are no short or long term intake concerns noted for the proposed MRLs of the commodities proposed for advancement.

## Flupyradifurone (285)

### European Union

The EU would like to **comment** that regarding the ARfD, the value of 0.15 mg/kg bw should not be rounded to 0.2 mg/kg bw as it has an impact >10% on the final value.

### African Union

#### Position:

AU noted the establishment of the ADI.

#### Justification:

Only toxicological data was evaluated since this compound was not registered at time of the evaluation. It would be evaluated for residue in the future.

## Lufenuron (286)

### European Union

The EU introduces a **reservation to the advancement** of the proposed draft MRLs. A chronic risk for European consumers could not be excluded. Considering the significant background exposure from the existing EU MRLs, there is no scope to raise the MRLs. Further refinements of the chronic exposure calculation are possible, however the relevant data have not yet been assessed in the EU.

- cucumbers
- edible offal (mammalian)
- melon, except watermelons
- milks
- potato
- poultry fats
- soya beans (dry)
- tomato

No specific comments.

- eggs
- poultry meat
- poultry, edible offal of

The MRL should be labelled with an asterisk, as it is appropriate to set the MRL at the LOQ.

- mammalian fats
- meat (from mammals other than marine mammals)

It is appropriate to set the MRL at the level of 0.5 mg/kg, equal to the calculated residue from the feeding study.

- pepper, sweet

The EU has a different policy as regards data requirements for major crops.

### African Union

Lufenuron was evaluated for toxicology and residues for the first time by the 2015 JMPR.

#### Position:

AU supports the advancement of the proposed draft MRLs for cucumbers, edible offal (mammalian), eggs, mammalian fats, meat (from mammals other than marine mammals), melon, except watermelons, milks, milk fats, pepper, sweet, potato, poultry fats, poultry meat, poultry, edible offal of, soya beans (dry) and tomato.

**Justification:**

There were no short term dietary intake concerns noted for this compound to present public health concerns.

**Quinclorac (287)****European Union**

The EU introduces a reservation to the advancement of the proposed draft MRLs for the following commodities:

**-cranberry**

**-rhubarb**

Noting that that quinclorac methyl ester is 10 times more toxic than the parent. Therefore it would be appropriate to include quinclorac methyl ester in the enforcement residue definition. This might be especially of relevance if in future MRLs for major crops would be considered. Furthermore the residue definition should not be labelled as fat soluble.

**African Union**

Quinclorac were evaluated for toxicology and residues for the first time by the JMPR.

**Position:**

AU supports the advancement of the proposed draft MRLs for cranberry and rhubarb.

**Justification:**

There were no long and short term dietary intake concerns noted for this compound to present public health concerns.

**Spices (various acetamiprid, cypermethrin, cyhalothrin, phorate, profenofos, triazophos)****European Union**

The EU supports the advancement of the proposed draft MRLs for the following commodity-pesticide combinations:

**-cardamom seed – cypermethrin**

**-cardamom seed – lambda-cyhalothrin**

**-cardamom seed – profenofos**

**-cardamom seed – triazophos**

**-cumin seed-profenofos**

No specific comments.

**-black pepper - acetamiprid**

**-cardamom seed - acetamiprid**

**-coriander seed- profenofos**

**-coriander seed – phorate**

**-coriander seed- triazophos**

Noting that an asterisk should be added as this MRL is set at the LOQ.