

## CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

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Agenda Item 5

CX/PR 11/43/03-Add. 1  
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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

## CODEX COMMITTEE ON PESTICIDE RESIDUES

Forty-Third Session

Beijing, China, 4-9 April 2011

COMMENTS on the Draft and Proposed Draft Maximum Residue Limits for Pesticides in  
Foods and Feeds at Steps 6 and 3, submitted by Australia, Brazil, Canada, Iran and Thailand.

GENERAL**Australia**

Australia considers that determining official Good Agricultural Practice is an essential step in setting maximum residue limits, both nationally and internationally. Australia appreciates that provision of such information may require additional effort for some regions. Recognising this, the 42nd CCPR, "endorsed the recommendations to JMPR, that an official letter would be acceptable if labels were not available" (para 160, ALINORM 10/33/24) [to support field trial data].

The 2010 JMPR received residue trials for a small number of commodities where labels or an official letter providing GAP were not provided. While the 2010 JMPR made recommendations for these commodities, Australia proposes that CCPR does not progress the recommendations further until official GAP is received (bifenthrin: mango, okra, papaya; difenoconazole: papaya).

AZINPHOS-METHYL (002)**Iran**

Walnut	0.05
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CARBARYL (008)**Iran**

Carrot	0.05
Citrus fruit	0.05
Egg plant	0.05
Olive	10
Pepper	0.05

DIAZINON (022)**Iran**

Cabbages	0.05
Melon	0.05
Carrot	0.05
Cherry	0.05
Cucumber	0.05

**ENDOSULFAN (032)****Australia**

Australia supports advancement of the MRL for tea to Step 5/8.

**Canada**

Canada is developing plans for the phase-out of endosulfan (Endosulfan - Re-evaluation Note - REV2010-16 - Health Canada Consultation Document). The Canadian registrants of endosulfan have signalled their intentions to phase out all uses of this pesticide in Canada. Canada is discussing the details of a stepwise phase-out process with registrants and will publish time frames in the future.

**FENITROTHION (037)****Iran**

Rice	1
Wheat	2
Apple	0.05

**OMETHOATE (055)****Australia**

Omethoate is included in the recommendations of the 2010 JMPR. Australia notes that all CXLs for omethoate have been withdrawn. It is therefore not appropriate to set MRLs for omethoate. Australia supports advancement of all the MRLs for spices, except those for omethoate, to Step 5/8. The spice recommendations for MRLs for omethoate should be deleted.

**CHLOROTHALONIL (081)****Australia**

Australia supports the advancement of all MRL recommendations to Step 5/8.

**Brazil**

Regarding the recommended MRL for Chlorothalonil in Banana, Brazil would like to submit new studies to support a higher MRL.

**Canada**

Canada has no objection to the JMPR ADI and ARfD and the recommended new and revised JMPR MRLs.

**Iran**

Onion	1
Leek	1

**CHLORPYRIFOS-METHYL (090)****Canada**

Canada has no objection to the recommended JMPR MRLs.

**METHOMYL (094)****Australia**

Australia supports advancement of the MRL for apple to Step 8.

**DITHIOCARBAMATES (105)****Iran**

Cabbages	0.5
Cucumber	0.5
Apple	2
Stone fruit (Apricot)	2

PHORATE (112)**Australia**

Australia notes that additional data for processed potato was evaluated by the 2009 JMPR but that dietary intake concerns still remain. No progress has been made to resolve the intake concerns and Australia supports the continued retention of the MRL at Step 7 until short-term dietary intake concerns are satisfactorily resolved.

PROPARGITE (113)**Iran**

Apple	1
Citrus fruit	2
Grape	2

CYPERMETHRIN (118) INCLUDES ALPHA- AND ZETA-CYPERMETHRIN**Australia**

Australia notes that the MRL for asparagus should remain at Step 7 until additional data from Thailand is evaluated by the 2011 JMPR.

OXAMYL (126)**Australia**

The 2008 JMPR concluded that there was insufficient data to support alternative GAP assessments for citrus, cucumber, melons (except watermelon) and peppers. Australia notes the previous decision to retain these MRLs at step 7 awaiting a periodic re-evaluation by JMPR scheduled for 2012.

TRIAZOPHOS (143)**Australia**

The MRL for soya beans (immature seed) retained at Step 7 has been superseded by a recommendation from the 2010 JMPR.

Australia does not support the recommendation for rice as based on the calculations of the 2010 JMPR the ARfD is exceeded for this commodity. The MRL recommendation for rice, husked should be retained at step 7 pending the evaluation of data by JMPR that would allow resolution of the short-term intake (processing studies on rice, additional toxicological studies relevant to the ARfD).

Australia supports advancement of the MRL for soya bean (immature seed) to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs. Triazophos is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

**Thailand**

- Draft Maximum Residue Limits for soya beans, immature seeds with the pod (at step 7).

**Background:** The 40th CCPR considered the proposed draft MRL for triazophos in soya beans (immature seeds with the pod) at the level of 1 mg/kg and agreed to advance the MRL to step 5, awaiting data from Thailand on edible portion residues for a more refined acute intake calculation. The 2010 JMPR evaluation additional residue data on edible portion of soya beans (immature) from Thailand and recommended an average ratio of residues in seed and whole pod including seed at 0.148.

**Comment:** Using the residue in edible portion ratio of 0.148 acute intake of triazophos in soya beans (immature seeds with the pod) is calculated as presented below. The acute intake for the general population and children aged less than 6 years old were 40% and 60% of the ARfD, respectively. It can be concluded that the short-term intake of residues of triazophos from the consumption of soya bean (immature seeds with the pod) is unlikely to present a public health concern. Therefore, Thailand supports the advancement of MRL for soya beans (immature seeds with the pod) at the level of 1 mg/kg for adoption at step 8.

**Triazophoa (143)**International estimate of short term intake (IESTI) for  
**GENERAL POPULATION**

Acute RfD = 0.001 mg/kg bw (1 µg/kg bw)

**Maximum %ARfD: 40%**

Codex Code	Commodity	STM or STM-P mg/kg	HR or HR-P mg/kg	Large portion diet			Unit weight		Variability factor	Case	IESTI µg/kg bw/day	% acute RfD rounded	
				Country	Body weight (kg)	Large portion, g/person	Unit weight, g	Country					Unit weight, edible portion, g
VP 0541	Soya bean (immature seeds) with pod	-	0.148	Thai	53.5	129	3	-	2	1	1	0.36	40%

**Triazophoa (143)**International estimate of short term intake (IESTI) for  
**CHILDREN UP TO 6 YEARS**

Acute RfD = 0.001 mg/kg bw (1 µg/kg bw)

**Maximum %ARfD: 60%**

Codex Code	Commodity	STM or STM-P mg/kg	HR or HR-P mg/kg	Large portion diet			Unit weight		Variability factor	Case	IESTI µg/kg bw/day	% acute RfD rounded	
				Country	Body weight (kg)	Large portion, g/person	Unit weight, g	Country					Unit weight, edible portion, g
VP 0541	Soya bean (immature seeds) with pod	-	0.148	Thai	17.1	66	3	-	2	1	1	0.57	60%

- Proposed Draft MRL for soya beans (immature seeds) (at step 3).

Thailand agree with the Proposed draft MRL for soya bean (immature seed) at the level of 0.5 mg/kg and support it for adoption at step 5/8. However, the commodity for soya bean (immature seed with pod) and soya bean (immature seed) share the same code of VP 0541. To avoid confusion for using these two MRLs, Thailand would like to suggest that an additional commodity code should be created so that these two commodities have different commodity codes.

- Proposed Draft Maximum Residue Limits for Spices

Since there are neither chronic nor acute intake concern, Thailand supports all proposed draft MRLs for subgroup 028B and 028D to be considered for adoption at step 5/8.

**CADUSAFOS (174)****Australia**

Australia supports the advancement of the MRL for banana to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs. Cadusafos is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

**BIFENTHRIN (178)****Australia**

Australia does not support the MRL recommendations for mango, okra and papaya as they are not supported by official GAP. It is recommended that the MRLs are retained at Step 4 pending submission of relevant official GAP to CCPR.

Australia does not support the recommendation for strawberry as based on the calculations of the 2010 JMPR the ARfD is exceeded for this commodity. The MRL recommendation for strawberry should be deleted unless an undertaking to provide alternative GAP and residue trial data to support a different MRL recommendation is given.

Australia supports the advancement of the other MRL recommendations (other than mango, okra, papaya, strawberry) to step 5/8.

**Canada**

Canada supports the ADI and ARfD and the revised new JMPR MRLs. Bifenthrin is currently under review for Canadian domestic registration

**DITHIANON (180)****Canada**

Canada has no objection to the JMPR ADI and ARfD. Dithianon is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

**TEBUCONAZOLE (189)****Australia**

The 42nd CCPR noted the concern expressed by the EU over the lack of an ARfD and decided to retain all the draft MRLs at Step 7, awaiting the outcome of the JMPR evaluation for toxicology (2010) and residues (2011). The 2010 JMPR set an ARfD of 0.3 mg/kg bw for tebuconazole and the 2008 JMPR calculated short-term intake for the recommendations made by that Meeting. The 2010 JMPR did not make the simple calculation of intake as a percentage of the new ARfD. This is presented below.

Using the new ARfD of 0.3 mg/kg bw the IESTI represents 0-10% of the ARfD for the general population and 0-40% for children (the intake figures from the 2008 JMPR were used for the general population and the STMR and HR values entered into the IESTI spreadsheet to calculate the intake for children).

As the estimated short-term intakes are unlikely to present a public health concern, Australia supports the advancement of all MRLs for tebuconazole currently at Step 7 to Step 8.

Additionally, as a toxicology was re-evaluated in 2010 and a large evaluation of residues was most recently conducted in 2008, and noting the number of compounds seeking scheduling for evaluation, Australia suggests tebuconazole be given a low priority for evaluation by JMPR.

**Canada**

Canada has no objection to the JMPR ADI and ARfD.

**FENPYROXIMATE (193)****Australia**

The MRL for grapes retained at Step 7 has been superseded by a recommendation from the 2010 JMPR.

Australia supports advancement of all MRLs recommended by the 2010 JMPR to Step 5/8

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs. Fenpyroximate is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

**HALOXYFOP (194)****Canada**

Canada has no objection to the recommended JMPR MRLs. Haloxyfop is not registered for use in Canada nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

**Iran**

Sugar beet	0.1
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**FENBUCONAZOLE (197)****Canada**

Canada has no objection to the recommended JMPR MRLs.

**ESFENVALERATE (204)****Australia**

Australia notes the previous decision to retain the draft MRLs for cotton seed, tomato and wheat at Step 7 awaiting the phase-out of fenvalerate.

**FLUDIOXONIL (211)****Australia**

Australia supports the advancement of all MRLs to Step 5/8.

**Canada**

Canada supports the JMPR ADI and the recommended new and revised JMPR MRLs.

\*Fludioxonil is the only pesticide in Canada for which there is an MRL for spices (0.02 ppm).

**METALAXYL-M (212)****Australia**

Australia notes the previous decision to retain all the draft MRLs at Step 7, awaiting the periodic re-evaluation of metalaxyl by JMPR in 2013.

**NOVALURON (217)****Australia**

Australia supports the advancement of all MRLs to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI and the recommended JMPR MRLs.

**BIFENAZATE (219)****Australia**

Australia supports advancement of all MRLs to Step 5/8

**Canada**

Canada supports the JMPR ADI and the proposed JMPR MRLs.

**BOSCALID (221)****Australia**

Australia supports the advancement of all MRL recommendations to Step 5/8.

**Canada**

Canada has no objection to the proposed JMPR ADI and the proposed JMPR MRLs.

**DIFENOCONAZOLE (224)****Australia**

Australia does not support the MRL recommendation for papaya as it is not supported by official GAP. It is recommended that the MRL is retained at step 4 pending submission of relevant official GAP to CCPR.

Australia supports the advancement of the other MRL recommendations (other than papaya) to step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs.

**CHLORANTRANILIPROLE (230)****Australia**

Australia supports the advancement of all MRL recommendations to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI and the recommended new and revised JMPR MRLs.

**FLUOPICOLIDE (235)****Canada**

Canada has no objection to the recommended JMPR MRLs.

**CLOTHIANIDIN (238)****Australia**

Australia supports the advancement of all MRL recommendations to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs.

**CYPROCONAZOLE (239)****Australia**

Australia supports advancement of all MRLs recommended by the 2010 JMPR to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the recommended JMPR MRLs. Cyproconazole is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

**DICAMBA (240)****Australia**

Australia supports the advancement of all MRL recommendations to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs.

**ETOXAZOLE (241)****Canada**

Canada has no objection to the JMPR ADI and the proposed JMPR MRLs.

**FLUBENDIAMIDE (242)****Australia**

Australia supports the advancement of all MRL recommendations to Step 5/8.

**Canada**

Canada has no objection to the JMPR ADI, ARfD and the proposed JMPR MRLs. Canadian MRLs are in the process of promulgation.

**FLUOPYRAM (243)****Australia**

Australia supports advancement of all new MRLs to Step 5/8.

**Canada**

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs. Fluopyram is currently under review for global registration in OECD countries.

**MEPTYLDINOCAP (244)****Australia**

Meptyldinocap is a purified form of dinocap. The JMPR has proposed a different residue definition for meptyldinocap containing only the compounds relevant to meptyldinocap.

The JMPR has recommended that while dinocap MRLs are retained, the residue definition for meptyldinocap for enforcement purposes should be dinocap, sum of isomers. Therefore the MRL recommendations for meptyldinocap should be held at Step 7 while the dinocap MRLs are in place and the MRLs for dinocap should be annotated to clearly indicate which active constituent is the basis for the MRL, i.e. dinocap or meptyldinocap.

The situation is essentially the same as for other resolved isomers with different residue definitions, i.e. metalaxyl and metalaxyl-M, fenvalerate and esfenvalerate etc. The MRLs for the resolved isomers are maintained at Step 7 for as long as the MRLs for the mixtures are maintained.

There are some issues that the committee needs to address to enable implementation of the JMPR proposal. This includes a change to the dinocap MRL listing to raise some MRLs as a result of the meptyldinocap evaluation.

**Current Dinocap CXLs relevant to meptyldinocap**

- Fruiting vegetables cucurbits 0.05\* mg/kg
- Grapes 0.5 mg/kg
- Strawberry 0.5 mg/kg

**Meptyldinocap MRLs recommended by the 2010 JMPR**

- Squash, summer 0.07 mg/kg
- Cucumber 0.07 mg/kg
- Melons except watermelon 0.5 mg/kg
- Grapes 0.2 mg/kg
- Strawberry 0.3 mg/kg

Required Dinocap MRL changes proposed by Australia

**DELETE:**

- Fruiting vegetables cucurbits 0.05\* mg/kg

**ADD:**

- Fruiting vegetables cucurbits [other than cucumber, summer squash, melons and watermelon]
- Cucumber 0.07 mg/kg
- Melons except watermelon 0.5 mg/kg
- Watermelon 0.05\* mg/kg

The proposed dinocap MRLs should be annotated to indicate the origin is from the use of meptydinocap.

Australia proposes that the current meeting agree to advance the proposed changes to dinocap MRLs to step 8.

Australia also proposes the advancement of all meptyldinocap MRLs to step 7, to be retained at step 7 while the dinocap MRLs are maintained.

**Canada**

Canada supports the JMPR ADI, ARfD and the proposed JMPR MRLs.

**THIAMETHOXAM (245)**

**Australia**

Australia supports the advancement of all MRLs to Step 5/8.

**Brazil**

Regarding the recommended MRL for Thiamethoxam in Papaya, Brazil would like to submit new studies to support a higher MRL.

**Canada**

Canada supports the JMPR ADI, ARfD and the recommended JMPR MRLs.