

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 6

CX/PR 18/51/5-Add.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

51st Session

Macao SAR, P.R. China, 8-13 April 2019

PROPOSED MAXIMUM RESIDUE LIMITS FOR PESTICIDES IN FOOD AND FEED

Comments at Step 3 in reply to CL 2018/97-PR submitted by
Australia, Brazil, Canada, Chile, Egypt and Sri Lanka

STEPS IN THE CCPR-CODEX PROCEDURE

- Step 1 Recommendation of priority compounds by CCPR, involving the *Ad Hoc* Working group on Priorities
- Step 2 First evaluation of the compound by the Joint FAO/WHO Meeting on Pesticide Residues; estimation of an ADI and of MRLs (draft MRLs or proposed Codex MRLs)
- Step 3 Submission of the proposed Codex MRLs to governments for a first round of comments
- Step 4 First discussion of the proposed MRLs by the CCPR in the light of the comments received
- Step 5 Submission of the proposed Codex MRLs to the Codex Alimentarius Commission in the light of the CCPR-discussion, for consideration
- Step 6 Submission of the proposed Codex MRLs to governments for a second round of comments
- Step 7 Final discussion of the proposed Codex MRLs by the CCPR in the light of comments received
- Step 8 Consideration by the CAC in view of adoption of the proposal as Codex MRL (CXL)
- Step 5/8 The proposed codex MRL is submitted to the Commission at Step 5; as there seems to be no controversy and no need for further discussion at Steps 6 and 7, omission of these Steps is recommended to the Commission

Guideline Levels (GLs) will not proceed beyond Step 4 of the procedure.

General comments

Chile

General Comments: Chile supports all the recommendations made by the JMPR, as a scientific advisory body to the Codex Committee, and therefore the advancement to the corresponding Step with the aim of its early adoption.

Rationale: It is important for the Codex to advance in the study and determination of MRLs of those active substances which are regularly used.

Egypt

Egypt appreciates the approach taken by JMPR in the determination of acceptable daily intakes, short-term dietary intakes, acute reference doses, recommended maximum residue limits and supervised trials median residue. Egypt agrees on the recommendations of the JMPR for pesticide maximum residue limits at Step 3 of the Codex Procedure.

Specific comments**Diquat (031)****Australia**

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

Canada

Canada acknowledges that JMPR has recommended maximum residue levels for the individual crop subgroups of dry beans and dry peas while the Canadian MRL is established on the entire pulses subgroup.

Imazalil (110)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels.

Lambda-cyhalothrin (146)**Canada**

Canada has no objection to the JMPR conclusion that the new studies did not have any impact on the ADI or the ARfD previously established in 2007. Lambda-cyhalothrin was recently re-evaluated in Canada. See [PRVD2017-03: Lambda-cyhalothrin](#) for details.

Propamocarb (148)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels.

Propiconazole (160)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels. Propiconazole was recently re-evaluated by Canada. See [PRVD2011-02: Propiconazole](#) for details.

Profenofos (171)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue level for coffee beans. Profenofos is not registered for use in Canada, nor have any import MRLs been established.

Bentazone (172)**Australia**

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

Canada

Canada acknowledges that the recommended maximum residue level for the new uses of dry peas is lower than the Canadian MRL based on different crop field trial data and a different residue definition for compliance with the MRL.

Abamectin (177)**Australia**

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

Canada

Canada has no objection to the JMPR recommended MRLs for the new uses.

Fenpyroximate (193)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels for the new uses. Fenpyroximate was recently registered in Canada for use on various greenhouse crops. See [PRD2016-01: Fenpyroximate](#) for details.

Kresoxim-methyl (199)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels. Kresoxim-methyl is currently undergoing re-evaluation in Canada.

Sri Lanka

Local recommendations: Not registered. Trials are underway.

Remarks: Local recommendations will be made on cucurbits.

Pyriproxyfen (200)**Canada**

Canada has no objection to the JMPR recommended maximum residue levels. Pyriproxyfen is currently undergoing re-evaluation in Canada.

Cyprodinil (207)**Australia**

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

Canada

Canada acknowledges the JMPR recommendation to replace the maximum residue level for pomegranate calculated using 3*mean with that calculated using the mean+4SD for post-harvest uses.

Pyraclostrobin (210)**Australia**

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

Brazil

The Brazilian Regulatory Agency (ANVISA) conducted short-term dietary risk assessment for compounds/commodities reported on CL 2018/97-PR.

The risk assessment methodology was based on WHO/FAO guidelines. The individual food consumption and body weight of people older than 10 years was based on the Brazilian household budget survey report released in 2009.

Based on the results of the short-term dietary risk assessment, Brazil has a concern regarding the MRL proposed for lettuce on compound pyraclostrobin. It is worth mention that Anvisa considered 0,03 mg/kg bw as ARfD.”

Canada

Canada acknowledges that the JMPR recommended maximum residue levels, for pome fruits, various legume vegetables and tuberous and corm vegetables, are lower than the Canadian MRLs for the same crop subgroups/groups based on different data (EU vs North America) and science policies at the time the Canadian MRLs were established. Canada has no objection to the remaining JMPR recommended maximum residue levels.

Fludioxonil (211)**Australia**

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

Canada

Canada acknowledges the differences between the JMPR recommended maximum residue levels for dry chickpeas and lentils based on different science policies at the time the Canadian MRLs were established.

Madipropamid (231)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels for the new uses. Mandipropamid was recently registered in Canada for foliar use on a variety of crops. See [Evaluation Report ERC2009-01, Mandipropamid Technical Fungicide](#) and [Proposed Registration Decision PRD2012-23, Mandipropamid](#) for details.

Fluopyram (243)**Australia**

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

Canada

Canada acknowledges that the JMPR recommended maximum residue level for the Tomatoes crop subgroup is lower than the Canadian MRL for the same crop subgroup based on different crop field trial data (field vs greenhouse). Fluopyram was recently registered for use on various horticultural and field crops. See [PRD2016-05: Fluopyram](#) for details.

Sulfoxaflor (252)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels. Sulfoxaflor was recently registered for use on various crops/crop groups. See [PRD2015-08: Sulfoxaflor](#) for details.

Chlorfenapyr (254)**Australia**

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

Canada

Canada acknowledges that the recommended maximum residue levels for the new uses of peppers and tomatoes are lower than the Canadian MRL for fruiting vegetables based on different crop field trial data.

Sri Lanka

Local recommendations: Not registered in SL

Remarks:

Chilli

Considering 20g chilli powder (imported treated powder) consumption/day by a 60 kg bw person the daily intake will not exceed ADI.

Tea

If daily consumption of 0.2L of tea (using 25g of tea powder) is considered (with 12 mg/kg STMR) in worst case (unprocessed, etc) the dietary intake of a 60 kg bw person is 0.005 mg/kg. It does not exceed the ADI.

Fluxapyroxad (256)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels for the new uses.

Benzovindiflupyr (261)**Australia**

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

Canada

Canada supports the JMPR recommendation to extrapolate the dry bean and dry pea Codex MRLs to the entire crop subgroups but notes that the recommended maximum residue level for the dry bean subgroup is lower than the Canadian MRL for the entire pulses subgroup.

Benzovindiflupyr was recently registered in Canada for use on various crops/crop groups. See [PRD2015-07: Benzovindiflupyr](#) for details.

Cyantraniliprole (263)**Australia**

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

Canada

Canada acknowledges that the JMPR recommended maximum residue level for the new use of Fruiting vegetables, cucurbits group is lower than the Canadian MRL for cucurbit vegetables based on different crop field trial data (field vs greenhouse). For grapes, the difference between the JMPR recommended maximum residue level and the Canadian MRL is also the crop field trial data. Cyantraniliprole was recently registered in Canada for use on various crops/crop groups. See [PRD2013-09: Cyantraniliprole](#) for details.

Sri Lanka

Local recommendations: Not yet registered. Trials are underway.

Local recommendations for commodities in CL 2018/97-PR: Local recommendations might be made on fruiting vegetables and cucurbits

Remarks: Considering the worst case scenario of consuming 250g of vegetables by an adult (60 kg bw) and kid (30 kg bw) per day, the dietary intakes are 0.001 and 0.002 respectively.

Cyazofamid (281)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels for the new uses.

Lufenuron (286)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels for the new uses. Lufenuron is not registered for use in Canada, nor have any import MRLs been established.

Isofetamid (290)**Australia**

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

Canada

Canada acknowledges that the JMPR recommended maximum residue level for the new use of Caneberries crop subgroup is lower than the Canadian MRL for the same crop subgroup based on different science policies at the time the Canadian MRL was established. Canada has no objection to the remaining JMPR recommended maximum residue levels. Isofetamid was recently registered for use on various crops/crop groups. See [PRD2014-19: Isofetamid](#) for details.

Oxathiapiprolin (291)**Australia**

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

Canada

Canada has no objection to the JMPR recommended maximum residue levels. Oxathiapiprolin was recently registered for use on various crops/crop groups. See [PRD2015-22: Oxathiapiprolin](#) for details.

Ethiprole (304)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels.

Sri Lanka

Local recommendations: Rice/ potato.

Local recommendations for commodities in CL 2018/97-PR: Rice

Remarks: Considering 0.75kg daily consumption of husked rice by a 60 kg bw person the dietary intake is 0.001 mg/kg (worst case considered – Ex. Unprocessed rice consumption).

The total dietary intake may not exceed ADI with residues coming from other sources (ex-poultry).

Fenpicoxamid (305)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue level.

Fluazinam (306)**Canada**

Canada supports the JMPR decision not to conduct a dietary risk assessment due to the lack of critical toxicology information.

Egypt

Egypt proposes to consider the values of EU pesticides database for Fluazinam as detailed in the following link http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=activesubstance_detail&language=EN&selectedID=1373

Mandestrobin (307)**Canada**

Canada supports the JMPR decision to postpone the residue evaluation of the compound to the 2019 Meeting on the basis that significant information was provided during the 2018 Meeting which could not be processed in the time remaining. Mandestrobin was recently registered for use on various crops/crop groups. See PRD2016-03: Mandestrobin for details.

Norflurazon (308)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels. Norflurazon is not registered for use in Canada, nor have any import MRLs been established.

Pydiflumetofen (309)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels. Pydiflumetofen was recently registered for use on various crops/crop groups. See [PRD2018-06: Pydiflumetofen](#) for details.

Pyrifenone (310)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels. Pyrifenone was recently registered for use on cucurbits and berry crops. See [PRD2016-23: Pyrifenone](#) for details.

Tioxazafen (311)**Australia**

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

Canada

Canada has no objection to the JMPR recommended ADI, ARfD and maximum residue levels. Tioxazafen was recently registered for use on field corn and soybeans. See [PRD2017-10: Tioxazafen](#) for details.