

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

CRD10
ORIGINAL LANGUAGE

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

50th Session

Haikou, P.R. China, 9-14 April 2018

Comments on Discussion paper on the possible revision of the IESTI equations, submitted by China, European Union, Kenya and AgroCare

China

China appreciates the hard efforts and enormous work accomplished by the EWG. The Chinese delegation propose to develop appropriate methods to quantify the differences between the present and the newly proposed IESTI equations and to further prove the necessity of revision parameters in IESTI equations. China supports to evaluate the impact of the new IESTI equations and relative parameters and identify a list of predictable trade issues.

European Union

European Union Competence

European Union Vote

The European Union would like to thank the electronic Working Group chaired by the Netherlands and co-chaired by Australia and Uganda for the preparation of the Discussion Paper Reviewing the International Estimate of Short-Term Intake.

The European Union appreciates that several important inputs to the work of the electronic Working Group will likely be available only in 2019 and could not yet be considered in the Discussion Paper presented to the Committee.

The European Union supports the recommendations of the electronic Working Group set out in the Discussion Paper, in particular:

- to have an in-session Working Group meeting to further discuss the recommendations of the electronic Working Group, including further development of the draft document to initiate the data gathering on bulking and blending;
- to accept the document "History, background and use of the IESTI equations", addressing Term of Reference (i) of the electronic Working Group;
- to re-establish the electronic Working Group with a view to continuing its work.

Kenya

Position: Kenya notes the document was uploaded and a provision of one week commenting period given that was not enough to get exhaustive comments from all interested parties. Kenya therefore proposes that that the documents should be uploaded early and ample time provided for review and comment after circulation.

AgroCare

The late availability of documents, the short time for comments and the lack of straight notification – especially regarding the opening of the second discussion round – all contribute for a consensus not being reached on the terms and documents discussed at the next plenary session.

We further recommend that the documents and the opening of discussions rounds to be strongly notified among eWG members. The late distribution of documents could not give members sufficient time for consideration, comments elaboration and decision making. Additionally, AgroCare is willing to translate the documents into Spanish in order to abroad the discussions held by Spanish speaking countries, but it can only be possible if they are provided in a timely manner.

The risk communication was echoed by some Codex members as one of the big reasons why the parameters on IESTI Equations should be changed, particularly for the cases when the residue levels found is at or below the LMR but could present risks for the population exposed, also regarding the ARfD. It is well known that those mentioned cases are rare among the active ingredients. So, we understand that those cases should receive a different approach for acute risk assessment, which can be further discussed by the eWG accordingly to the Terms of Reference ii (Advantages and challenges that arise from the current IESTI Equations and their impact).

Nevertheless, AgroCare defends that the scientific approach must be considered as the first criteria on any decision taken by CCPR, which includes any changes proposed to IESTI equations as well. There is no scientifically based evidence of increased risk to human health from the current equations.