

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 6

CX/PR 18/50/5-Add.1

March 2018

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

50<sup>th</sup> Session

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

**COMMENTS at Steps 3 and 6 on draft and proposed draft maximum residue limits for pesticides in foods and feeds at Steps 4 and 7, submitted by Australia, Brazil, Canada, Chile and Egypt**

#### 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

##### Brazil

Brazil evaluated the 2017 JMPR report. The Brazilian Health Regulatory Agency (ANVISA) assessed dietary risk for compounds / plant commodities reported on CL 2018/11-PR. The chronic and the acute risk assessment was done for pesticides presented at Table 1 and Table 2, respectively.

It worth mention that acute risk assessment was done for Bicyclopyrone, Chlormequat and 2,4-D as well. In these cases, ARfD recommended by EFSA were used.

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 risk assessment carried out by ANVISA, Brazil has no concerns regarding the MRLs proposed by JMPR. However, this understanding may be changed after a risk assessment refinement, such as reducing the gaps of data as Brazilian children's individual consumption and the inclusion of animal commodities MRLs.

**Chile**

General comments: Chile supports all proposals for MRLs made by the JMPR as Codex scientific advisory body for this Committee.

Rationale: It is important that the Codex moves forward in the study and determination of MRLs of those active principles that are used regularly and for which the Codex has not yet established an MRL or a reevaluation is being carrying out.

**Egypt**

Egypt agrees the recommendations of the 2017 joint FAO/WHO meeting on pesticide residues (JMPR).

**2,4-D (020)****Canada**

Canada has no objection to the JMPR's decision not to recommend an MRL for cotton based on the questionable storage stability data.

**Captan (007)****Canada**

Canada notes that it was able to establish an MRL for ginseng using the same data for which JMPR deemed questionable.

**Chlormequat (015)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, AR/D and recommended MRLs. Chlormequat chloride was recently re-evaluated in Canada and was granted continued registration. See [Proposed Re-evaluation Decision PRVD2009-13, Chlormequat Chloride](#) and [Re-evaluation Decision RVD2010-02, Chlormequat Chloride](#) for additional details.

**Thiophanate-methyl (077)****Canada**

Canada notes JMPR's justification for not completing the residue evaluation. In Canada, the re-evaluation of thiophanate-methyl is pending the submission of additional toxicity studies for thiophanate-methyl and carbendazim (major metabolite of thiophanate-methyl). See [Proposed Re-evaluation Decision PRVD2011-07, Thiophanate-methyl](#) and [Update on the Re-evaluation of Thiophanate-methyl: REV2012-14](#)

**Oxamyl (126)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, AR/D and recommended MRLs. Oxamyl was recently re-evaluated in Canada and was granted continued registration. See [Proposed Re-evaluation Decision PRVD2007-02, Oxamyl](#) and [Re-evaluation Decision RVD2008-05, Oxamyl](#) for additional details.

**Propiconazole(160)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Abamectin (177)****Canada**

Canada has no objection to JMPR's decision not to undertake a re-evaluation of this active ingredient, based on the data provided. Canada agrees with maintaining the evaluation of 2015.

**Fenpropimorph (188)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Fenpropimorph is not registered for use in Canada, nor are there any import MRLs established.

**Tebuconazole (189)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Fenpyroximate (193)****Australia**

Other than for the subgroup of cherries the subgroup of plums, peach watermelon and tomato, for which the JMPR identified an issue with short-term exposure, Australia supports advancement of the MRLs to Step 5/8.

**Canada**

Canada has no objection to the proposed JMPR ADI, ARfD and recommended MRLs. Canada recently registered fenpyroximate for use on several crops. See [Proposed Registration Decision PRD2016-01, Fenpyroximate](#) and [Registration Decision RD2016-11, Fenpyroximate](#) for additional details.

**Imidacloprid (206)****Canada**

Canada has no objection to JMPR's decision not to recommend an MRL for pistachio in the absence of trials conducted in accordance to GAP.

**Cyprodinil (207)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Trifloxystrobin (213)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Difenoconazole(224)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs, noting that the MRLs for the dry pea and dry bean subgroups are higher than the Canadian MRL of 0.03 ppm.

**Azoxystrobin (229)****Australia**

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

**Canada**

Canada has no objection with the recommended MRLs, noting that the recommended MRL of 0.5 ppm for rapeseeds is lower than the Canadian MRL of 1 ppm.

**Prothioconazole (232)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Spinetoram (233)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Fluopyram (243)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs, noting that the MRL for the subgroup of dry beans is lower than the Canadian MRL of 0.7 ppm based on the same data.

**Acetamiprid (246)****Canada**

In the absence of receiving any new relevant toxicology data, Canada has no objection to JMPR's decision not to undertake the re-evaluation of this active ingredient.

**Isopyrazam (249)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Isopyrazam is not registered for use in Canada, however, MRLs have been specified to allow for importation of various crops. See [PMRL2013-50](#) and [PMRL2016-20](#) for details.

**Propylene Oxide (250)****Canada**

Canada has no objection to the JMPR's ADI's and ARfD's for propylene oxide and its major metabolites propylene chlorohydrins and propylene bromohydrins. Canada notes JMPR's justifications for not recommending MRLs for tree nuts.

**Saflufenacil (251)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Picoxystrobin (258)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Fluensulfone (265)****Canada**

Canada has no objection to JMPR's recommendation not to estimate MRLs for citrus, soya beans, sugarcane, coffee and black pepper in the absence of a registered GAP.

**Imazapyr (267)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Imazamox (276)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Flonicamid (282)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs, noting that the MRLs for the dry pea and dry bean subgroups are lower than the Canadian MRL of 3 ppm, based on the same data.

**Flupyradifurone (285)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs.

**Quinclorac (287)****Australia**

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

**Canada**

Canada has no objection to the recommended MRLs, noting that the residue definition for enforcement is different between Canada and JMPR

**Bicyclopyrone (295)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Canada recently registered bicyclopyrone for use on several crops. See [Proposed Registration Decision PRD2015-02, Bicyclopyrone](#) and [Registration Decision RD2015-13, Bicyclopyrone](#) for additional details.

**Cyclaniliprole (296)****Australia**

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

**Canada**

Canada notes that all recommended MRLs are based on the field use pattern anticipated residue comparison model, as described in the General Considerations Item 2.4 of the JMPR Report. Canada supports the work of the JMPR in estimating MRLs using a model that compares anticipated residues at harvest resulting from differences in application rates, retreatment intervals, and PHI. Canada recommends that this tool, which incorporates dissipation kinetics to model residue decline following applications, be investigated further using larger databases that include various commodity groups and chemicals. Upon gaining additional experience, JMPR may consider elaborating the principles further, if necessary.

Canada recently registered cyclaniliprole for use on several crops. See [Proposed Registration Decision PRD2017-02, Cyclaniliprole](#) and [Registration Decision RD2017-17, Cyclaniliprole](#) for additional details.

**Fenazaquin (297)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Fenazaquin is not registered for use in Canada, nor are there any import MRLs established.

**Fenpyrazamine (298)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Fenpyrazamine is not registered for use in Canada, however, MRLs have been specified to allow for importation of various crops. See [PMRL2015-19](#) for details.

**Isoprothiolane (299)****Australia**

Australia supports advancement of the MRLs to Step 5/8

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Isoprothiolane is not registered for use in Canada, nor are there any import MRLs established.

**Natamycin (300)****Canada**

Canada has no objection to the JMPR decision of not recommending an ADI, ARfD and MRLs for natamycin. Natamycin is not registered for use in Canada, nor are there any import MRLs established.

**Phosphonic acid (301)****Canada**

Canada has no objection to the JMPR ADI (which applies to fosetyl-Al and phosphonic acid, expressed as fosetyl-Al) and recommended MRLs. Fosetyl Al is currently under re-evaluation. See [Proposed Re-evaluation Decision PRVD2017-19, Fosetyl Aluminum](#) for additional details.

**Fosetyl-Al (302)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI (which applies to fosetyl-Al and phosphonic acid, expressed as fosetyl-Al) and recommended MRLs. Fosetyl Al is currently under re-evaluation. See [Proposed Re-evaluation Decision PRVD2017-19, Fosetyl Aluminum](#) for additional details.

**Triflumezopyrim (303)****Australia**

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

**Canada**

Canada has no objection to the JMPR ADI, ARfD and recommended MRLs. Triflumezopyrim is not registered for use in Canada, nor are there any import MRLs established.