Committee on Commodity Problems

INTERGOVERNMENTAL GROUP ON TEA

Twenty-first Session

Bandung, Indonesia, 5-7 November 2014

REPORT OF THE WORKING GROUP ON MAXIMUM RESIDUE LEVELS[[1]](#footnote-1)

# BACKGROUND

1. Pesticide residues in tea has been a major non-tariff trade barrier that has been affecting tea trade globally since 1990’s. Its not because many tea samples tested high residues, but they did exceed certain default MRLs which were set at very low levels approaching analytical detection limits. There was thus a dire necessity felt by members of fixing realistic MRLs which will be acceptable to all stakeholders to ensure smooth tea trade globally.
2. The FAO-IGG on Tea in its Bali Meeting in 2005 has constituted an Working Group (WG) on MRLs in Tea to assist data generation required for fixation of MRLs of pesticides in tea. The WG in its first meeting set out a roadmap to work on 24 pesticides selected on basis of glabal use pattern. The objective was to generate data for fixing Codex MRLs as well as to use the data for fixing national and other MRLs so that it lays the ground for harmonization of different MRLs for the same pesticide. Since then Codex MRLs in tea were fixed for Chlorpyriphos, Paraquat, Dicofol, Cypermethrin, Fenpropathrin, Etoxazole, Thiamethoxam, Bifenthrin, Flubendiamide etc., to which the work of this initative contributed. The status updated in Rome Intersessional meeting held in May 2014 showed another 10 compounds can be considered for submission by various member states simultaneously through their national codex contact points.
3. Since it was not possible to achieve the global harmonization of MRLs in the true sense, the data also served as the basis for fixation of several national and international MRLs as the Codex MRLs for some compounds were later adopted by EU. Today there are CODEX and EU comparable MRLs for a number of compounds in Tea as shown below:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Pesticides | CODEX MRL (mg/kg)  | EU MRL(mg/kg) | Pesticides | CODEX MRL (mg/kg)  | EU MRL(mg/kg) |
| Paraquat | 0.2 | 0.05 | Ethion  | - | 3 |
| Methidathion | 0.5 | 0.1 | Profenophos | - | 0.1 |
| Clothianidin | 0.7 | 0.7 | Propiconazole | - | 0.1 |
| Fenpropathrin | 2 | 2 | 2,4-D  | - | 0.1 |
| Chlorpyrifos | 2 | 0.1 | Phosalone | - | 0.1 |
| Deltamethrin | 5 | 5 | Hexaconazole | - | 0.05 |
| Propargite | 5 | 5 | L-cyhalothrin | - | 1 |
| Endosulfan | 10 | 30 | Fenazaquin | - | 10 |
| Etoxazole | 15 | 0.05 | Thiacloprid | - | 10 |
| Permethrin | 20 | 0.1 | Flufenoxuron | - | 15 |
| Thiamethoxam | 20 | 20 | Hexythiazox | - | 4 |
| Cypermethrin | 15 | 0.5 | Acetamiprid | - | 0.05 |
| Bifenthrin | 30 | 5 | Quinalphos | - | 0.1 |
| Flubendiamide | 15 | 0.02 | Glyphosate | - | 2.0 |
| Dicofol  | 50 | 20 | Oxyfluorfen | - | 0.05 |

1. Notwithstanding the perceived difficulties in harmonization of different MRLs, the data generated under the initiatives of the FAO-IGG WG on MRL has led to setting up of realistic MRLs in many tea importing countries like Australia, Canada and the USA. This opportunity so created has led to a decision at the 20th session of the IGG on Tea (Colombo, 30 January - 1 February 2012) [Ref Document: CCP 12/14 E February 2012] to change the nomenclature of “harmonization of tea MRLs” to "Achieve global cooperation obtaining MRLs in tea". But the entire exercise has certainly yielded positives. Today we have more realistic MRLs in EU as compared to 10 to 15 years ago resulting in a positive impact on export of tea to EU. Having MRLs in the importing countries like the USA and Canada has opened up new markets for the tea producing countries using such products which otherwise would have faced very low default MRLs. The default MRLs are the major trade barrier and the collective work of this group can help covert them into realistic MRLs that will ensure food safety as well as smooth tea trade.
2. It is also a time to look for opportunities to break away from the traditional approach of risk assessment for fixing MRLs or for harmonization of MRLs. Examples of 23 nations harmonizing their MRLs in Grape under APEC initiative is an indication of what the future has for us. It’s a necessity now that MRLs are fixed in tea for new promising molecules as well as those left out so that ever increasing pests particularly in view of the climate change can be managed effectively.
3. The priority list of chemicals for the data generation first prepared in 2005 for 24 pesticides has been updated in subsequent sessions. In the Intersessional Meeting of Group held in FAO HQ, Rome, Italy on 5-6 May 2014, the main objective of this Group was to finalize the priority list of compounds in different countries and remove anomalies and duplication of work. The WG agreed on the priority list of chemicals, as follows:

# PRIORITY LIST OF CHEMICALS

|  |  |  |
| --- | --- | --- |
|  | Data Availability | Action Required |
| Insecticides |
| Acetamiprid | Limited | Field trials |
| Bifenthrin | Yes | Not required |
| Buprofezin1/ | Submitted to EU |  |
| Chlorfenapyr | Yes | Not required |
| Chlorfluazuron | Yes | Data submission |
| Chlorpyrifos | Yes | Not required |
| Chromafenozide | Limited | Field trials |
| Clothianidin | Yes | Not required |
| Cypermethrin | Yes | Not required [US, Canada\*] |
| Dimethoate | Limited | Field trials |
| Emamectin benzoate | In progress | Field trials |
| Fenpropathrin | Yes | Not required |
| Fenpyroximate | Yes | Not required |
| Fipronil | In progress | Field trials, \*\* Env Concerns? |
| Flubendiamide | In progress | Field trials |
| Flufenoxuron | Yes | Data submission |
| Imidacloprid | Yes | Residue definition |
| Permethrin | Limited | Field trials |
| Propargite  | Yes | Not required |
| Spiromesifen | Yes | Not required |
| Thiacloprid | Yes | Data submission |
| Thiamethoxam | Yes | Not required |
| λ-Cyhalothrin | Yes | Data submission |
| Indoxycarb | In progress | Field trials |
| Dichorvos1/ |  |  |
| Acaricides |
| Abamectin1/ |  |  |
| Acequinocyl | In progress | Field trials |
| Chlofentezine1/ |  |  |
| Dicofol | Yes | Data submitted |
| Ethion | Yes | Data submission |
| Etoxazole | Yes | Not required |
| Fenpyroximate | In progress | Field trials |
| Hexythiazox | In progress | Field trials |
| Milbemectin | No | Field trials |
| Permethrin | Limited | Field trials |
| Polysulphide sulphur | Exempted | Not required |
| Propargite | Yes | Not required |
| Spiromesifen  | Yes | Not required |
| Herbicides |  |  |
| 2,4-D | Limited | Field trials, \*\* |
| Diuron | In progress | Field trials |
| Glufosinate-ammonium | Limited | Field trials |
| Glyphosate | Yes | Not required |
| MCPA | Yes | Not required |
| Metolachlor1/ |  |  |
| Oxyfluorfen | In progress | Field trials |
| Paraquat | Yes | Not required |
| Fungicides |  |  |
| Azoxystrobin | yes | Not required |
| Bitertanol  | yes | Data submission |
| Chlorothalonil1/ |  |  |
| Copper hydroxide | Yes | Not required |
| Copper Oxychloride | Yes | Not required |
| Copper oxide | Yes | Not required |
| Difenoconazol | Limited | Field trials |
| Hexaconazole | Yes | Data submission |
| Propiconazole | Yes | Data submission |
| Pyroclostrobin1/ |  |  |
| Tebuconazole | Yes | Data submission |
| Thiophanate-methyl | To be done | Field trials |
| Trifloxystrobin | To be done | Field trials |

[Note: 1/ Members of the WG did not have information on whether sufficient field trial data were already available for this compound. Therefore, they are to provide the WG with this information.]

1. Other Decisions taken were as follows:
* A list and a timetable for those chemicals that are planned for submission to Codex would be distilled from the above table and would be provided to the IGG/Tea Secretariat for advance notice to Codex. The intent was to progress submissions through Codex with the view to achieve global harmonization of MRLs for tea.
* A paper detailing the correlation between field trial protocol and GLP supervised protocol was to be prepared. This paper would be used to persuade regulators who insist on GLP field trials to accept data generated using the IGG/Tea protocol.
* The communication plan was to be reviewed and comments were to be returned within two months.
* The Decision Tree was to be modified to remove the “accepted by secondary standards” box since it was felt that this was premature and currently too restrictive.

# STATUS OF WORK SINCE THE LAST MEETING

## DATA SUBMISSION UNDER JMPR EVALUATION SCHEDULE

1. Under 2013 JMPR Follow-up Evaluation Schedule, two pesticides –viz., Fenpyroximate and Propiconazole used in tea in India were included. The data on propiconazole and fenpyroximate in JMPR format was submitted to National Codex Point for evaluation by JMPR in December, 2012. In March, 2013 data for 2,4-D and Imidacloprid were submitted by India to national Codex Point for evaluation by JMPR under 2014 JMPR Follow-up Evaluation Schedule.
2. Under 2015 JMPR New Compounds Schedule, the pesticide Fenazaquin and Under 2015 JMPR Follow-up Evaluation Schedule, Acetamiprid and Tebuconazole are included. These two compounds are in the priority list and work on data generation is in progress. In India till date 4 field trial data is available. Sri Lanka have 8 field trials for Tebuconazole.
3. China has submitted data on Indoxacarb in tea to Codex, based on eight field trials conducted in China. The MRL of indoxacarb was approved at 5 mg/kg in JMPR meeting in October, 2013 and in May, 2014.

## DATA GENERATION

1. Field trials were carried out to generate residue data in tea for acetamiprid (4 trials), emamactin benzoate (2 trials) and flubendiamide (2-trials), oxyfluorfen (2-trial), thiacloprid and in India as per the priority list. The data generated is being compiled for submission. The risk assessment was carried out using the brew factor and the proposed MRL in tea is as shown below:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  Pesticides | Rate (kg ai/ha) | PHI (days) | Residues in Tea (mg/kg) | Test methods  | Brew factor |  MRL proposed (mg/kg) |
| Fenpyroximate | 0.01 to 0.025 | 7 | 0.641, 1.78 | HPLC-DAD & LC-MS/MS | 0.031 | 5.0 |
| Acetamiprid | 0.125 | 7 | 0.68, 0.13, 2.43 | HPLC-DAD, LC-MS/MS | 0.5 | 5.0 |
| Imidacloprid | 0.0225 | 7 | 0.79, 0.2, 0.69 | HPLC-DAD & LC-MS/MS | 0.72 | 2.0 |
| Propiconazole | 0.1 | 7 | 1.66, 0.42, 0.64 | HPLC-DAD, GLC-ECD | 0.1315 | 5.0 |

1. The supervised field trials as par GAP for chlorfenapyr, indoxacarb and tolfenpyrad have been conducted and completed in China during 2011-2013. The field trials for chlorfenapyr, indoxacarb and tolfenpyrad were conducted in four locations in 2010-2012, 2011-2012 and 2012-2013 respectively.
2. Requests were sent to member countries seeking information on the status of field trials/data generation/data submission for the compounds in the priority list in order to prepare a list and a timetable for those chemicals that are planned for submission to Codex. The feedback received from members would be discussed in the 21 Session at Bandung and based on which a time table for data submission would be provided to the IGG/Tea Secretariat for advance notice to Codex. As there are a number of trial data already available in different member countries, there is scope of pooling the data to obtain the required number of trials for MRL fixation in tea by simultaneous submissions for at least some compounds as evident from the feedback received till 28 Oct 2014 from a few members as given below:

**Updates on the priority list
(Based on response from members as on 28 Oct 2014)**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Pesticides | Data Availability  | No of trials & Country | National MRLs[MRL (Country)] | Data submitted to Codex & date |
| 1 | 2 | 3 | 4 | 5 |
| Acetamiprid | Yes | 4(Japan)4 (India) 8 (China) | 40 (Jp), 50 (US) |  |
| Bifenthrin | Yes | 6(Japan)2(India) | 30 (Jp) , 30 (US) | 30 (2011) |
| Buprofezin | Submitted to EU | 6(Japan) | 30 (Jp), 20 (US) |  |
| Chlorfenapyr | Yes  | 2(Japan)10 (China) | 0.01 (US), 40 (Jp) |  |
| Chlorfluazuron | Yes | 8 (Sri Lanka)2(Japan) | 10 (Jp), | Not submitted |
| Chlorpyrifos | Yes | 2(Japan)6 (India) | 10 (Jp), | 2 (2005) |
| Chromafenozide | Limited | 2(Japan) | 20 (Jp), |  |
| Clothianidin | Yes  | 3(Japan)2 (India) | 50 (Jp), 70 (US) | 0.7 (2011) |
| Cypermethrin | Yes | 2(Japan)4(India) | 20 (Jp) | 15 (2012) |
| Dimethoate | Limited | 2 (India) | 1 (Jp) |  |
| EmamectinBenzoate | In progress | 2(Japan)2(India) | 0.5 (Jp) |  |
| Fenpropathrin | Yes | 2(Japan)2 (India) | 25 (Jp), 2 (US), 2(Canada) | 2 (2007) |
| Fenpyroximate | Yes | 2(Japan)2 (India) | 40 (Jp), 20 (US) |  |
| Fipronil  | Yes | 8 (Sri Lanka) | 0.002 (Jp) | Not submitted |
| Flubendiamide | Yes | 2(Japan)2 (India) | 50 (Jp) | 50 (2011) |
| Flufenoxuron | Yes | 2(Japan) | 15 (Jp) | (8trials, 2014)  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Imidacloprid | Yes  | 2(Japan)8 (Sri Lanka)2 (India) | 10 (Jp) | Evaluation(8trials, 2015) |
| Permethrin | Limited  | 2(Japan) | 20 (Jp) |  |
| Propargite  | Yes | 2(Japan)6 (India) | 5 (Jp), 10 (US)10 (India)1 (Argentina) | 5 (2004) |
| Spiromesifen | Yes | 2(Japan) | 30 (Jp), 40 (US) |  |
| Thiacloprid | Yes | 4 (Japan)2 (India)8 (Registrant) | 30 (Jp) |  |
| Thiamethoxam | Yes  | 4 (Japan)4 (India) | 20 (Jp)20 (US) | 20 (2011) |
| λ-Cyhalothrin | Yes | 2(Japan)4 (India) | 15 (Jp) |  |
| Indoxycarb | Yes | 8(China) |  | Evaluation 2013 (8trials, China) |
| Dichorvos |  |  | 0.1 (Jp) |  |
| Novaluron | To be generated |  |  |  |
| Abamectin |  |  |  |  |
| Acequinocyl | In progress | 4(Japan)0.5 (Argentina) | 0.5 (Argentina)40 (Jp), |  |
| Chlofentezine |  | 2(Japan) | 20 (Jp) |  |
| Dicofol | Yes | 8(India) | 3(Jp)5 (India)50(US) | 50 (1997) Revoked40 (2011, 5/8) |
| Ethion | Yes | 12(India) | 0.3(Jp), 5 (India) |  |
| Etoxazole | Yes | 4(Japan) | 15 (Jp), 15 (US)  |  |
| Fenpyroximate | In progress | 2(Japan)2(India) | 40 (Jp), 20 (US) 0.1 (Argentina) |  |
| Hexythiazox | In progress | Registration for tea deleted (Jp) | 35 (Jp)4 (Argentina) | 15 (2012)Codex MRL is established with the 8 field trials conducted in India. |
| Milbemectin | No | 2(Japan) | 0.7 (Jp) |  |
| Permethrin | Limited | 2(Japan) | 20 (Jp) |  |
| Polysulphide sulphur | Exempted |  |  |  |
| Propargite | Yes | 2(Japan)4(India) | 5 (Jp), 10 (US), 10 (India), 1 (Argentina) | 5 (2004) |
| Spiromesifen  | Yes | 2(Japan) | 30 (Jp), 40 (US), 60 (Canada) |  |
| 2,4-D | Limited | 1 (India) |  |  |
| Diuron | In progress | Not registered in Japan | 1 (Jp) |  |
| Glufosinate-ammonium | Limited | Not registered in Japan | 0.01 (India)0.3 (Jp) |  |
| Glyphosate | Yes | 2 (Japan) | 0.5 (Argentina)1 (US) -- Leaf 7 (US) – Powder1 (Jp) |  |
| MCPA | Yes | 8 (Sri Lanka) |  | Not submitted |
| Metolachlor  |  |  |  |  |
| Oxyfluorfen | In progress | 1 (India) |  |  |
| Paraquat | Yes | 8 (Japan)2 (India) | 0.3 (Jp) | 0.2 (2006) |
| Azoxystrobin | Yes | 4 (Japan) | 10 (Jp) |  |
| Bitertanol  | Yes | 8 (Sri Lanka) | 0.1 (Jp) | Not submitted |
| Chlorothalonil |  | 2 (Japan) | 10 (Jp) |  |
| Copper hydroxide | Yes | 2 (India), Not Required in Japan | 150 (India) as copper, Exempted (Japan) |  |
| Copper Oxychloride | Yes | 8 (Sri Lanka)4 (Japan)2 (India) | 150 (India) as copper, Exempted (US, Japan) | Joint Application with India |
| Copper oxide | No |  | Exempted (US, Japan) |  |
| Difenoconazol | Limited | 2 (Japan) | 10 (Jp) |  |
| Hexaconazole | Yes | 8 (Sri Lanka)3 (India) | 0.05 (Jp) | Not submitted |
| Propiconazole | Yes | 8 (Sri Lanka)3 (India) | 0.1 (Jp), 4 (Canada) | Not submitted |
| Pyraclostrobin |  | 8 (Sri Lanka)2 (Japan) | 5 (Jp) | Not submitted |
| Tebuconazole | Yes | 4 (Sri Lanka)2 (Japan) | 50 (Jp) | Not submitted |
| Thiophanate-methyl | To be done | 2 (Japan) | 7 (Jp) |  |
| Trifloxystrobin | To be done | 3 (Japan) | 5 (Jp) |  |
| Carboxim  | To be done |  |  |  |
| Tolfenpyrad | Available | 8(China) | 20 (Jp), 50 (US) | Evaluation (2013) |

1. The feedback indicates the following:

Acetamiprid: 8 trials data [Scope for submission by Japan, India & China]
Hexaconazole: 11 trials data [Scope for submission by Sri Lanka & India]
Propiconazole: 11 trials data [Scope for submission by Sri Lanka & India]
Chlorfluazuron: 10 trials data [Scope for submission by Sri Lanka & Japan]
Fipronil : 8 trials data [Scope for submission by Sri Lanka]
Imidacloprid: 12 trials data [Scope for submission by India, Japan, & Sri Lanka, (Evaluation 2015)]
Flufenoxuron: 8 trials data [Evaluation 2014]
Indoxycarb: 8 trials data [Submitted by China, Evaluation 2013]
MCPA: 8 trials data [Scope for submission by Sri Lanka]
Ethion: 12 trials data [Scope for submission by India]
λ-Cyhalothrin: 6 trials data available. Needs 2 more.
Buprofezin: 6 trials data available. Needs 2 more. The data package submitted to the EU did not meet the data requirements for Europe.
Fenpyroximate: 4 trials data available, Needs 4 more.

1. JMPR Evaluation schedule:

The 2014 Draft JMPR report (September 2014) has evaluated the following compounds for tea: Fenpropathrin recommended MRL 3 mg/kg
 Flufenoxuron recommended MRL 20 mg/kg

The latest CCPR schedule (31 Aug 2014) contains the following compounds for 2015 (lists now closed)

Fenazaquin (Tea), Imidacloprid (Tea), Lufenuron (tea - 4 trials)

The proposed schedule for 2016 currently contains the following compounds of interest to tea: Spiromesifen (Tea), Pyrifluquizanon (tea – 6 trials), Azoxystrobin, Deltamethrin, Fipronil, Tolfenpyrad and Tebuconazole

## HARMONIZATION OF MRLS INTERNATIONALLY

1. The harmonization of MRLs internationally is the goal set by this group. It is acknowledged that due to the different regulatory evaluation processes in different counties, evaluation of the same field trial data package can result in different MRLs.
2. Since the Sep 2012 Intersessional meeting, new MRLs have been granted for propiconazole in Canada; for bifenthrin, buprofezin, clothianidin, fenpropathrin, fenpyroximate, spiromesifen, thiamethoxam and tolfenpyrad in the USA; temporary MRLs have been granted for diquat, fluazifop-butyl, glufosinate ammonium, paraquat, imidacloprid and azoxystrobin in Australia.
3. A comparison of current Codex and consuming country MRLs shown below indicate where progress has been made and where adoption of realistic MRLs is still required:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Pesticides | CODEX MRL (mg/kg)  | EU MRL(mg/kg) | USA(mg/kg) |  Canada(mg/kg) |  Australia(mg/kg) | Japan(mg/kg) |
| Paraquat | 0.2 | 0.05\* |  |  | 0.5(T) | 0.3 |
| Methidathion | 0.5 | 0.1\* |  |  |  | 1 |
| Clothianidin | 0.7 | 0.7 | 70 |  |  | 50 |
| Fenpropathrin | 2 | 2 | 2 | 2 | 2 | 25 |
| Chlorpyrifos | 2 | 0.1\* |  |  | 2 | 10 |
| Deltamethrin | 5 | 5 |  |  | 5 | 10 |
| Propargite | 5 | 5 | 10 |  |  | 5 |
| Endosulfan | 10 | 30 | 24 |  | 30(T) | 30 |
| Etoxazole | 15 | 15 | 15 |  |  | 10 |
| Permethrin | 20 | 0.1\* |  |  |  | 20 |
| Thiamethoxam | 20 | 20 | 20 |  |  | 20 |
| Cypermethrin | 20 (\*15) | 0.5 |  |  | 0.5 | 20 |
| Bifenthrin | 30 | 5 | 30 |  | 5 | 25 |
| Flubendiamide | 50 | 0.02\* |  |  |  | 40 |
| Dicofol  | 50 | 20 | 50 |  | 5 | 3 |
| Hexythiazox | 15 | 4 |  |  |  | 35 |
| Ethion  | - | 3 |  |  | 5 | 0.3 |
| Azoxystrobin | - | 0.1\* |  |  | 20(T) | 10 |
| Propiconazole | - | 0.1\* |  | 4 |  | 0.1 |
| 2,4-D  | - | 0.1\* |  |  |  |  |
| Glufosinate ammonium | - | 0.1\* |  |  | 20(T) | 0.3 |
| Hexaconazole | - | 0.05\* |  |  |  |  |
| L-cyhalothrin | - | 1 |  | 2 | 1 | 15 |
| Fenazaquin | - | 10 |  |  |  |  |
| Thiacloprid | - | 10 |  |  |  | 30 |
| Acetamiprid | - | 0.1 (0.05^) | 50 |  |  | 30 |
| Chlorfenapyr |  | 50 |  |  |  | 40 |
| Glyphosate | - | 2.0 | 1 |  | 2 | 1 |
| Oxyfluorfen | - | 0.05\* |  |  |  |  |
| Fenpyroximate | - | 0.1\* | 20 |  |  | 10 |
| Flufenoxuron | - | 15 |  |  |  | 15 |
| Spiromesifen | - | 50 | 40 |  |  | 30 |

 [ \*default; (T) temporary; ^ from 25th August 2014]

1. The Food Safety & Standard Authority of India (FSSAI) has also undertaken an initiative in May 2013 to harmonize its own standards with that of Codex or other International standards and various stakeholders have been engaged in e-working groups. The work is expected to be completed by end of 2014. (<http://www.fssai.gov.in/Portals/0/>Pdf/Proceedings\_of\_Codex\_workshop\_II(02.11.13).pdf.,
<http://www.fssai.gov.in/Portals/0/Pdf/scanpdf/AnnexureI-Strategy> for Standards Development.pdf)
2. A submission was made in Australia in Jan 2014 requesting the adoption of the EU/Codex MRLs for thiacloprid, spiromesifen, clothianidin, etoxazole, hexythiazox, thiamethoxam and chlorfenapyr. Proposal M1010 on Maximum Residue Limits was published 31 October 2014 with deadline for submission comments of 28 November 2014. This proposal includes proposed MRLs for the 7 compounds above, an MRL for kresoxim-methyl of 15 mg/kg adopted from Japan and an additional 9 compounds (chlorpyrifos-methyl, diflubenzuron, fenpyroximate, flubendiamide, permethrin, tebufenpyrad, triadimefon, triadimenol and tridemorph) set at EU default MRL levels. It is also proposed to remove all MRLs for endosulfan, including for tea of 30 mg/kg, because thereis no domestic use for this compound.
3. In order to harmonize the calculation of MRLs so that the evaluation of the same set of residue trial data results in the same MRL recommendation, use of the OECD calculator may be actively considered. The OECD calculator is adopted in countries like India since 2013. This approach may hasten the ultimate objective of harmonization of MRLs of different countries.

# ACTION PLAN DECIDED IN THE ROME INTERSESSIONAL MEETING

## PRIORITY LIST SUBMISSION TIMETABLE

* Sufficient data available for 10 compounds
* Recommend these be submitted to JMPR in 2014 ( latest by Dec 2014) for consideration at 2015 CCPR through Codex national contact points
* To request EU for continuing Propargite import tolerance in tea. All producing countries to immediately send a communication stating importance of its use in tea

[Status: (1) Argentina and India sent requests to EU as suggested,

 (2) Chemtura (USA) submitted additional data to EU on 2 June, 2014

 (3) India generated data on propargite metabolites in tea in collaboration with Chemtura (USA) in Aug-Sep 2014 & submitted to Chemtura (USA)

 (4) EU MRL lowered from 5mg/kg to 0.05 mg/kg

 (5) Chemtura (USA) to submit additional data for review by EU in1st Qr, 2015]

## COMMUNICATION PLAN

* Recommend countries share submission timetable with Codex CCPR national contact points.
* WG to provide a guideline of what information should be submitted through the national contact points. [ Status: Information on field trial on pesticide residues in tea as per FAO manual for submission and evaluation of pesticide residues data circulated to members on 7 Oct 2014]
* Recommend WG to compile and maintain a comparative table of MRLs for tea in producing / consuming countries. Make available on IGG website. [Status: to be done after confirmation from members in the 21 Session ]
* For new compounds, communicate & seek support from manufacturers to meet the requirement for fixing MRLs in export destination countries as well as producing countries. [Status: To follow up]
* Special Communication to negate adverse publicity [ Status: “Response to Consumers on Agricultural Residues”, special communications issued by The Tea Association of Canada to reassure consumers that they were not at risk by providing scientific information and FAQ hosted in Tea Board website by India]

# FUTURE PLAN

1. Issues requiring attention for data generation

(1) Assessing status of field trials required for setting Codex MRLs & submission of the list for advance notification to FAO-IGG & National Codex Points.

(2) Updating priority list based on new information on Risk assessment, or Replacements or Potential use in Tea.

(3) Assessing status & development of required infrastructure & new methods to cope with changing situations & cost.

(4) Communication plan for quick information exchange and advance notification for simultaneous data submission by members & seeking manufacturers support.

(5) Data submission to include brew factor based risk assessment for all teas traded globally except Matcha Tea.

(6) To share available information on anthraquinone and risk assessment in tea and tea brew.

1. Submitted by India and the United Kingdom. [↑](#footnote-ref-1)