

# codex alimentarius commission



FOOD AND AGRICULTURE  
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Agenda Item 7 (b)

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

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## PILOT PROJECT ON ESTABLISHMENT OF NATIONAL GOVERNMENT MRLS AS CODEX INTERIM MRLS FOR SAFER PESTICIDES: NATIONAL GOVERNMENT COMMENTS IN RESPONSE TO CL 2004/48-PR AND JMPR COMPARISON

*Prepared by the USA*

The Pilot Project Working Group has collated the comments received from member countries concerning the pilot project on establishment of national government MRLs as Codex interim MRLs for safer pesticides. Member countries were asked to comment on both the proposed interim MRLs and the interim MRL *process* (ALINORM 04/27/24, para. 233). Thus, the following collation is divided into two main sections. First, is a summary of the comments on the proposed interim Codex MRLs for bifenthrin, fludioxonil, and trifloxystrobin. MRLs for trifloxystrobin and fludioxonil were also considered by the 2004 JMPR, using the standard JMPR process. The CCPR requested that the JMPR compare the proposed interim MRLs for trifloxystrobin and fludioxonil with the MRLs actually recommended by the JMPR and to comment on any differences (ALINORM 04/27/24, paragraph 223). A summary of this JMPR comparison is also included in the first section. Attachments I and II contain a detailed summary of all the specific comments received on each proposed MRL. The second section is a summary of the comments received on the interim MRL *process*. The third and final section discusses next steps.

### *I. Comments on the Proposed Interim MRLs*

#### *A. Comments from Member States*

Seven member states provided written comments. These were Australia, Canada, Iran, Japan, Lithuania, Mexico, and New Zealand. Iran noted that the subject pesticides were not authorized in their country. Australia, Canada, and Mexico supported the proposed Codex interim MRLs for all three chemicals based on the finding that the intake values are appropriate and the dietary intake assessments are satisfactory and show low risk. Canada noted that, for fludioxonil the residue definition for animal commodities in Canada includes parent only, whereas the interim MRL definition includes parent and metabolites. Japan and Lithuania apparently had no objections to the proposed Codex interim MRLs based on risk or technical concerns but did suggest that several specific MRLs be set lower or higher than the proposed MRLs based on the MRLs established in their countries. In addition, Japan suggested that the residue definition for trifloxystrobin for plant commodities should be parent only, noting that the metabolite is a very small part of the residue.

New Zealand was concerned that some of the proposed interim MRLs for bifenthrin were not supported by adequate storage stability data.

For trifloxystrobin New Zealand supported a higher interim MRL value for barley (0.5 vs. 0.3 mg/kg) based on European data considered an outlier in the European review process (but included in the JMPR process).

For fludioxonil, New Zealand had reservations about some extrapolations made, the sufficiency of two of the residue trials, and they suggested a different interim MRL for one commodity based on their interpretation of the residue trials included in the package.

New Zealand also suggested that there is no need to consider Interim MRLs at or about the Limit of Determination because there is little benefit from a trade facilitation point-of-view in proposing such MRLs. Given the resources involved in collating and evaluating the supporting data, New Zealand proposes consideration of excluding MRLs at or about the Limit of Determination from the scope of the Interim MRL scheme.

### ***B. Comments from the 2004 JMPR***

As noted above, JMPR was scheduled to review trifloxystrobin and fludioxonil in 2004. As a result there was an opportunity to compare immediately the results of the pilot Codex Interim MRL process to the results of an actual JMPR review for these two chemicals. The CCPR requested that JMPR perform this comparison and comment on any differences (ALINORM 04/27/24, paragraph 223). It is important to note that this occurred because of the desirability of a comparison for the pilot test of the Interim MRL process. It would not be expected to occur otherwise, since the basic premise of the interim MRLs is that they would be established earlier than MRLs that went through the standard process and be reviewed by JMPR within 4 years—but not immediately.

The JMPR provided a detailed commodity-by-commodity comparison of Interim MRL and JMPR MRL recommendations. This comparison is shown in Attachment II. In summary, there were no risk concerns from dietary intake. Although some differences exist between interim MRL proposals and JMPR MRL proposals, both the JMPR and the interim process indicate *no dietary intake concerns*. In fact, the interim approach is more conservative in that it estimated acute dietary intakes for fludioxonil and trifloxystrobin, whereas the JMPR found that acute endpoints were not needed. For fludioxonil, the interim approach estimated 0-13% of the ADI for the regional diets; the JMPR estimated 0-1% of the ADI. For trifloxystrobin, the interim approach estimated 0-6% of the ADI in the regional diets while the JMPR estimated 1-2% of the ADI.

The technical differences involved use of different residue data sets, different extrapolation rules, and some differences in residue study interpretations/evaluations. The residue definitions for trifloxystrobin also differed. The interim MRL definition for plant and animal included the parent and its acid metabolite, while the JMPR definition for plant did not include the metabolite. For trifloxystrobin, for which only 10 interim MRLs were proposed, six were identical to the JMPR proposals, two JMPR MRL estimates were higher and two were lower. The largest difference was for barley grain. The higher JMPR MRL estimate, 0.5 mg/kg compared to the 0.3 mg/kg interim value, resulted from consideration of some European data by the JMPR that were not used for the interim MRL proposal or for the European Commission MRL.

For fludioxonil, there was a comparison of 42 MRL recommendations. Sixteen were identical to the JMPR proposals, 13 JMPR MRL estimates were higher, and 13 were lower or JMPR made no recommendation. The JMPR MRL estimate for cereal grains (incorporating 9 individual interim MRLs) resulted from the consideration of a more extensive data base of cereal grain data and was slightly higher than the proposed interim MRL (0.05 mg/kg versus 0.02 mg/kg), but in both cases residues were at the limit of quantitation of the analytical methods. In some cases, such as onion, the JMPR had a more geographically diverse data set that yielded a higher value (0.5 vs 0.2 mg/kg for onion). Some differences were due to different policies on extrapolation of data (from one crop to another). For example, JMPR did not extrapolate seed treatment data on cereal grains to sunflower seed and soya seed. In another case, the data for lychee were not considered acceptable by JMPR because they were from trials with applications significantly higher than the maximum seasonal GAP. Because they were not used for lychee they were not extrapolated to pulasan, rambutan, Spanish lime, and longan.

## II. Comments on the Interim MRL Process

The comments on the process focused mainly on three areas:

- o If different (higher) MRLs than those proposed by the nominating country are to be considered, how will that occur?
- o What data are really necessary for member states to conduct their review?
- o How can the process be made efficient, transparent, and clear to all participants?

Commenters' proposals in answer to these questions are summarized below. No specific suggested resolutions to the first issue were provided. However, Australia did suggest that rejection of proposed Interim MRLs can only be on the basis of dietary intake concerns; i.e. objective evidence that the ADI or ARfD is exceeded.

Concerning what data are really necessary to conduct the review, New Zealand stated that the data provided for each compound in the Summary, the National Government Assessments, the Toxicology and Residue Chemistry Study Summaries and the associated list of References were sufficient to evaluate the proposed Interim MRLs for the three pilot project compounds. New Zealand also suggested that the submissions be prepared as a series of smaller documents, each addressing the different sections, and possibly distributed in PDF format.

Australia and Canada were the only commenters to provide specific suggestions on the process. Their proposals also include their views on the data required for review. The procedure Australia and Canada propose for adoption is provided below in its entirety.

### Actions

1. The proposed chemical and Interim MRLs must be nominated to the Chair, Ad Hoc Working Group on Priorities by 1 February for consideration at the next Working Group on Priorities meeting.
2. If the Working Group agrees that the criterion for safer use replacement chemical is satisfied then the nominations for Interim MRLs are to proceed to the CCPR for agreement.
3. CCPR consideration and agreement.
4. On CCPR agreement, the nominating country (and sponsor company) must then provide the following to member countries no later than 1 July:
  - a. Summary reports of the toxicology (equivalent to OECD Tier II summaries). These summary reports of the toxicology database should also contain "summary" and/or "discussion" sections which explain how the health intake values (ADI and ARfD) were set, document the safety factors used, and comment on whether they are likely to be conservative or not. For example, was the ARfD based on an endpoint in a repeat-dose study because there was no adequate acute study in toxicological database? Or was the endpoint a critical endpoint from a developmental toxicity study? Discuss whether (a) a LOAEL is used instead of a NOAEL and thus warranted the application of an additional factor and (b) indicate when the endpoint selected originated from a developmental neurotoxicity study or from a study which shows sensitivity of the young.
  - b. The national government assessment of the data in support of the interim MRL(s). These to include: A summary table of the health intake values from all countries where the chemical has been evaluated; a summary of residue trial data (NOT raw data) and an explanation of how the MRL was determined for the relevant commodities; a summary table of robust analytical methods for determining residues in the proposed crops; a table of all the MRLs for nominated commodities in the countries where the chemical is registered; and chronic and acute dietary intake assessments for all the regional diets considered by JMPR (FAO/WHO GEMS). Note: A full toxicological report should be available on request from the nominating country.
5. Comments are to be forwarded to the Interim MRL Group by 31 December. The Interim MRL Group will prepare and submit a report to the Chair, Ad Hoc Working Group on Priorities by 1 February (Australian suggestion) or March 15 (Canadian suggestion), for consideration at the next meeting of the Ad Hoc Working Group on Priorities.
6. The Ad Hoc Working Group on Priorities will consider any technical issues raised and decide which Interim MRLs are proposed to the CCPR for agreement at the plenary session.

7. Interim MRLs agreed or refused by the CCPR.
8. Interim MRLs will be considered by CAC for ratification.
9. Interim MRLs recognized as CXLs from CAC ratification.

**Note 1.** In reviewing summary reports, member countries need to be satisfied that the health intake values (ADI and ARfDs) are appropriate and the dietary intake assessments for all relevant regional diets meet those health intake values. Member countries must focus on the likelihood of the ADI and/or the ARfD being exceeded at the value of the nominated Interim MRL. Rejection of proposed Interim MRLs can only be on the basis of dietary intake concerns; i.e. objective evidence that the ADI or ARfD is exceeded.

**Note 2.** Membership of the Interim MRL Group, currently the Interim MRL Pilot Project Working Group, will need to be formalized if the pilot project is extended.

**Note 3.** Action 1 to begin a new cycle of the Interim MRL procedure will be completed by 1 February, coincident with Action 6 of the cycle already underway.

\* This process would take approximately 15 months turnaround time from the first consideration at CCPR.

Finally, in addition to the areas of concern discussed above, several commenters noted the data packages were long and not enough time was given for their review. The JMPR noted concern over the definition of "safer"-- whether it refers to less toxic (hazard) or lower residue level (exposure) and whether it is limited to human health or also includes environmental effects. The JMPR also cautioned that because the interim MRLs are limited to a period of 4 years, pesticides nominated in this process must be reviewed by the JMPR within this period. If there are many nominations for interim MRLs, the currently limited resources of the JMPR might result in the evaluations for some of the pesticides not being completed within the 4 years or other priorities, such as periodic reviews and evaluations, might have to be curtailed.

### ***III. Next Steps***

The process discussed at the 2004 CCPR indicates that this collation of comments should be distributed to member countries for their information. The next step calls for the Working Group on Priorities to *analyze* the comments from member countries and the JMPR and prepare a preliminary appraisal of technical issues for consideration at the 2005 CCPR. The 2005 Working Group on Priorities will address and seek to resolve technical issues and make recommendations to the CCPR on advancement or deletion of proposed interim MRLs. It will also seek to resolve issues related to the process and make recommendations on process improvements (ALINORM 04/27/24, paragraphs 220 – 234).

CCPR will then decide on the proposed interim MRLs and consider recommendations on the process. It will decide whether to continue with development of interim MRLs and determine any necessary revisions to the process.

**Attachment 1: Summary of Interim MRL Proposals, JMPR Recommended MRLs, and Various Member State Comments**

\* Note: Australia, Canada, and Mexico supported the proposed interim MRLs, however, clearly affirmative comments have not been included in Attachment 1.

Summary of Comments on Interim MRL Proposals

Commodity	Interim MRL (mg/kg)	JMPR MRL <sup>1</sup> (mg/kg)	Canada Comment	Japan Comment	Lithuania Comment	New Zealand Comment
<i>Bifenazate</i>						
Apple pomace, wet	2					NONE <sup>5</sup>
Cottonseed SO 0691	1					NONE <sup>5</sup>
Pome fruits FP 0009	1		0.58 <sup>2</sup> (apple)	2 <sup>3</sup> (1.4 max)		
Grapes FB 0269	1			3 <sup>3</sup> (1.6 max)		
Raisin DF 0269	2					
Hops DH 1100	15					NONE <sup>5</sup>
Nectarine FS 0245	2					
Tree nuts TN 0085	0.2					NONE <sup>6</sup>
Peach FS 0247	2					
Mint top HH 0738	25					NONE <sup>5</sup>
Plums FS 0014	0.3			1 <sup>3</sup> (0.33 max)		0.2 <sup>7</sup>
Mint top HH 0738	25					
Strawberry FB 0275	2			5 <sup>3</sup> (2 max)		NONE <sup>5</sup>
Cucumber VC 0424	0.5			2 <sup>3</sup>		NONE <sup>5</sup>
Squash VC 0431	0.7					NONE <sup>5</sup>
Melons VC 0046	0.3					NONE <sup>5</sup>
Watermelon VC 0432	0.3					NONE <sup>8</sup>
Pepper VO 0051	2					NONE <sup>5</sup>
Chili pepper VO 0444	2					NONE <sup>8</sup>
Okra VO 0442	2					NONE <sup>8</sup>
Tomato VO 0448	1			2 <sup>3</sup> (0.33 max)		
Eggplant VO 0440	2					NONE <sup>8</sup>
Tea DT1114	2					NONE <sup>6</sup>
Meat (from	0.1 (fat)					NONE <sup>9</sup>

Commodity	Interim MRL (mg/kg)	JMPR MRL <sup>1</sup> (mg/kg)	Canada Comment	Japan Comment	Lithuania Comment	New Zealand Comment
mammals other than marine animals) MM095						
Edible offal, mammalian MO 0105	0.02					NONE <sup>9</sup>
Milks ML 0106	0.01					NONE <sup>9</sup>
Poultry meat PM110	0.01 (*)					NONE <sup>9</sup>
Poultry, edible offal of PO110	0.01 (*)					NONE <sup>9</sup>
Eggs PE112	0.01 (*)					NONE <sup>9</sup>
<i>Fludioxonil</i>						
Stone fruit FS12	5	5 Po				
Grapes FB269	2	2		5 <sup>3</sup> (1.75 max)		
Strawberry FB275	2	3		5 <sup>3</sup> (1.5 max)		
Raspberry FB272	5	5				
Blackberry FB264	5	5				
Blueberry FB20	2	2				
Currants FB21	2	NONE				NONE <sup>8</sup>
Lychee FI343	1	NONE				NONE <sup>6</sup>
Longan FI342	1	NONE				NONE <sup>6,8</sup>
Pulasan FI357	1	NONE				NONE <sup>6,8</sup>
Rambutan FI358	1	NONE				NONE <sup>6,8</sup>
Spanish lime FI366	1	NONE				NONE <sup>6,8</sup>
Onion VA385	0.2	0.5				
Onion, spring (green) VA389		5				
Cabbages, head VB41	2	2				
Broccoli VB400	2	0.7				0.7 or 1 <sup>10</sup>
Potato VR589	0.02 (*)	0.02				
Carrot VR577	1	0.7				

Commodity	Interim MRL (mg/kg)	JMPR MRL <sup>1</sup> (mg/kg)	Canada Comment	Japan Comment	Lithuania Comment	New Zealand Comment
Watercress VL473	10	10				NONE <sup>6</sup>
Mustard greens VL485	20	10				
Herbs HH726	10	Basil 10 Chives 10				Basil 10 Chives 10
Herbs HH726	65	Basil, dry 50 Chives, dry 50				Basil, dry 50 Chives, dry 50
Rapeseed SO495	0.01 (*)	0.02 (*)				NONE <sup>11</sup>
Cottonseed SO691	0.05 (*)	0.05 (*)				NONE <sup>11</sup>
Sunflower seed SO702	0.01 (*)	NONE				NONE <sup>11</sup>
Soya SO4723	0.01 (*)	NONE				NONE <sup>11</sup>
Pistachio TN675	0.1	0.2				
Wheat GC645	0.02 (*)	Cereal grains 0.05 (*)				NONE <sup>11</sup>
Rye GC650	0.02 (*)					NONE <sup>11</sup>
Spelt GC4673	0.02 (*)					NONE <sup>11</sup>
Triticale GC653	0.02 (*)					NONE <sup>11</sup>
Barley GC640	0.02 (*)					NONE <sup>11</sup>
Oats GC647	0.02 (*)					NONE <sup>11</sup>
Maize GC645	0.02 (*)					NONE <sup>11</sup>
Popcorn GC656	0.02 (*)					NONE <sup>11</sup>
Sorghum GC651	0.02 (*)					NONE <sup>11</sup>
Sweet corn (corn-on-the-cob) VO447	0.02 (*)	0.01 (*)				NONE <sup>11</sup>
Meat (from mammals other than marine) MM95	0.01 (*)	0.01 (*)				NONE <sup>11</sup>
Edible offal (mammalian) MO105	0.05 (*)	0.05 (*)				NONE <sup>11</sup>
Milks ML106	0.01 (*)	0.01				NONE <sup>11</sup>
Poultry meat PM110	0.01 (*)	0.01 (*)				NONE <sup>11</sup>
Poultry, edible offal	0.05 (*)	0.05 (*)				NONE <sup>11</sup>

Commodity	Interim MRL (mg/kg)	JMPR MRL <sup>1</sup> (mg/kg)	Canada Comment	Japan Comment	Lithuania Comment	New Zealand Comment
of PO111						
Eggs PE112	0.05 (*)	0.05 (*)				NONE <sup>11</sup>
Meat (from mammals other than marine) MM95	0.04 (*)	0.05 (fat)			0.02 <sup>4</sup>	NONE <sup>11</sup>
Edible offal (mammalian) MO105	0.05	Kidney 0.04(*) Liver 0.05				
Eggs PE112	0.04 (*)	0.04 (*)			0.02 <sup>4</sup>	NONE <sup>11</sup>
<i>Trifloxystrobin</i>						
Pome fruits FP9	1.0	0.7	0.5 <sup>2</sup>	5 <sup>3</sup> (1.2)		
Grapes FB269	3.0	3	2 <sup>2</sup>			
Grapes, dried DF269	5.0	5				
Milks ML106	0.02 (*)	0.02 (*)				NONE <sup>11</sup>
Poultry meat PM110	0.04(*)	0.04 (*) (fat)				NONE <sup>11</sup>
Poultry, edible offal of PO 111	0.04 (*)	0.04 (*)				NONE <sup>11</sup>
Barley GC640	0.3	0.5			0.2 <sup>4</sup>	0.5 <sup>12</sup>
Wheat GC654	NONE	0.2			0.05 <sup>4</sup>	
Sugar beet VR596	NONE	0.05			0.05 <sup>4</sup>	

<sup>1</sup> See Attachment 2 for a complete list of JMPR comments.

<sup>2</sup> Canada notes their MRLs but supports advancement of the Interim MRLs.

<sup>3</sup> Japan prefers the higher MRLs established in their country. The value in parenthesis is the maximum field trial residue in Japan.

<sup>4</sup> Lithuania prefers to use the indicated lower MRLs established in their country.

<sup>5</sup> Possible storage stability issue.

<sup>6</sup> Insufficient number of trials.

<sup>7</sup> Seven trials, with residues of 0.01 – 0.15 mg/kg. Therefore, MRL should 0.2 mg/kg.

<sup>8</sup> Extrapolation/Translation not supported.

<sup>9</sup> Not needed, as there are no animal feed items (if the commodity MRLs suggested for deletion are deleted).

<sup>10</sup> MRL should be 0.7 or 1 mg/kg based on consideration of the broccoli data.

<sup>11</sup> For the interim process, do not establish MRLs at the limit of quantitation (\*).

<sup>12</sup> MRL should be 0.5 mg/kg, based on a German trial (BRD-2143-99) reported by the manufacturer (See page 1326, Table 1, of trifloxystrobin data package).



**Attachment 2: JMPR Comparison of Interim MRL Values and JMPR Recommendations (JMPR Report 2004, General Considerations)**

Proposed Interim MRL and Corresponding JMPR Recommended MRLs<sup>1</sup>

Commodity	Interim MRL Recommendation (mg/kg)	JMPR MRL Recommendation (mg/kg)	Comment on Difference
<p>Trifloxystrobin Interim Definition: Plant and animal, trifloxystrobin + CGA321113 or (E,E)-Methoxy-imino-{-2-[1-(3-trifluoromethyl-phenyl)-ethylideneaminoxymethyl]-phenyl}-acetic acid. JMPR Definition: Plant, trifloxystrobin; animal, trifloxystrobin + CGA321113.</p>			
Barley GC640	0.3	0.5	High value from EU = 0.19 mg/kg. EC established 0.3 mg/kg. (Table B.7.49 and Table B.7.50) High value from JMPR = 0.40 mg/kg, based on. trial from Germany 1999.
Grapes FB269	3	3	
Grapes, dried DF269	5	5	
Pome fruit FP9	1	0.7	High value from European Commission, 0.44 mg/kg.
Edible offal (mammalian) MO105	0.05	Kidney MO98, 0.02 Liver MO99, 0.05	Interim, wide scope JMPR, narrow scope
Eggs PE112	0.04*	0.04*	
Meat (mammalian) MM95	0.04*	0.05 (fat)	Interpretation of feeding study. JMPR determined a maximum residue in fat of 0.038 mg/kg; 0.04 mg/kg is the LOQ (0.02 trifloxystrobin + 0.02 metabolite). Trifloxystrobin present in fat (0.05 mg/kg) at a feeding level of 20 ppm is approximately twice the US and JMPR calculated dietary intake of cattle. The 0.04 value is based on <i>one</i> feed item, barley, compared with the much greater intake of the total US and JMPR treated commodities.
Milks ML106	0.02*	0.0008* F	Equivalent, based on 4% fat in whole milk
Poultry, edible offal of	0.04*	0.04*	
Poultry meat	0.04*	0.04 (fat)	Interpretation of feeding study.
<p>Fludioxonil Interim Definition: Plant, fludioxonil. Animal, fludioxonil +metabolites determined as 2,2-difluorobenzo[1,1]dioxole-4-carboxylic acid, calculated as fludioxonil. JMPR Definition: Same</p>			
Herbs (fresh) HH726	10	Basil HH722, 10	JMPR restricted maximum residue levels to the specific herbs and did not extend them to the entire herbs group.
		Chives HH727, 10	
Herbs (dry) HH726	65	Basil, dry DH722, 50	JMPR considered two trials and a

Commodity	Interim MRL Recommendation (mg/kg)	JMPR MRL Recommendation (mg/kg)	Comment on Difference
		Chives, dry HH727, 50	drying factor of 8, yielding 15 and 24 mg/kg. The Interim approach considered dried basil and dried chives, one trial each, with residues of 23 and 31 mg/kg.
Blackberry FB264	5	5	
Blueberry FB20	2	2	
Broccoli VB400	2	0.7	Same data set (US Interim based on US brassica head and stem subgroup 5A (with higher residues for cabbage)).
Cabbages, head VB41	2	2	
Carrot VR577	1	0.7	Same data set. Interim MRL based on US tolerance of 0.75 mg/kg rounded up under JMPR rules; highest residue was 0.46 mg/kg. JMPR reported highest residue 0.42 mg./kg from same data set.
Wheat GC643	0.02*	Cereal grains GC80, 0.05*	Interim based on seed treatments in the US, with an LOQ of 0.02 mg/kg. JMPR based on 71 trials in Europe and US, with LOQs ranging from 0.01 to 0.05 mg/kg.
Rye GC650	0.02*		
Spelt GC4673	0.02*		
Triticale GC653	0.02*		
Barley GC640	0.02*		
Oats GC647	0.02*		
Maize GC645	0.02*		
Popcorn GC656	0.02*		
Sorghum GC651	0.02*		
Cottonseed SO691	0.05*	0.05*	
Currants FB21	2		Interim based on translation of blueberry field trials (<0.05-1.4 mg/kg) to the US bushberry subgroup 13B. JMPR does not make this translation.
Grapes FB269	2	2	
Longan FI342	1	None	Based on lychee.
Lychee FI343	1	None	Same data (US). JMPR considered the three trials to be in excess of GAP.
Mustard greens VL485	20	10	Same data set. Interim maximum residue reported as 7.7 mg/kg; JMPR maximum residue reported as

Commodity	Interim MRL Recommendation (mg/kg)	JMPR MRL Recommendation (mg/kg)	Comment on Difference
			7.1 mg/kg.
Onion VA385	0.2	0.5	Interim based on US data only with a maximum value of 0.11 mg/kg (0.06 mg/kg average for high field trial). JMPR included European data with a maximum value of 0.34 mg/kg
Pistachio TN675	0.1	0.2	Same data set (US). Although highest residue 0.08 mg/kg, JMPR estimated 0.2 mg/kg based on the small size of the set (n=3).
Potato VR589	0.02*	0.02	
Pulasan FI357	1	None	Based on lychee.
Rambutan FI358	1	None	Based on lychee.
Rapeseed SO495	0.01*	0.02*	Interim based on translation of other seed treatment data (wheat) with an LOQ of 0.01 mg/kg. JMPR based on 15 trials in Europe with an LOQ of 0.02 mg/kg.
Raspberry FB272	5	5	
Soya SO4723	0.01*	None	JMPR received no data. Interim based on seed treatment use and translation of data from wheat, lettuce, pea, cucumber, and radish (all below LOQ).
Spanish lime FI366	1	None	Based on lychee.
Stone fruit FS12	5	5	
Strawberry FB275	2	3	Interim based on US data only, with maximum value of 1.3 mg/kg. JMPR included European data, with maximum of 1.9 mg/kg.
Sweet corn (corn-on-the-cob) VO447	0.02*	0.01*	Interim based on LOQ for the cereal grain group. Codex does not consider sweet corn in the cereal grain group and evaluated data separately.
Watercress VL473	10	10	
Meat (from mammals other than marine) MM95	0.01*	0.01*	
Edible offal (mammalian) MO105	0.05*	0.05	
Milks ML106	0.01*	0.01	
Poultry meat PM110	0.01*	0.01*	

Commodity	Interim MRL Recommendation (mg/kg)	JMPR MRL Recommendation (mg/kg)	Comment on Difference
Poultry, edible offal of PO111	0.05*	0.05*	
Eggs PE112	0.05*	0.05*	

LOQ, limit of quantification; GAP, good agricultural practice.

<sup>1</sup> Reproduced from General Consideration 2.5 of the 2004 Report of the JMPR