

25/06/2010

**European Union Comments on  
Codex Circular Letter CL 2010/ 11-PR**

**PART A: MATTERS FOR ADOPTION BY THE 33<sup>RD</sup> SESSION OF THE  
CODEX ALIMENTARIUS COMMISSION**

**DRAFT MAXIMUM RESIDUE LIMITS FOR PESTICIDES**

**AT STEP 8 OF THE CODEX PROCEDURE**

*European Union Competence  
European Union Vote*

The European Union (EU) supports the adoption of all the draft MRLs in Appendix II of ALINORM 10/33/24 **with the exception of the Draft MRL for Methomyl (094) in apples** due to acute intake concerns. The EU would like to record its reservation to this decision in the report of the CAC.

The EU expressed its concerns in relation to the draft MRL for Methomyl in apples at the CCPR 42. Using EU endpoints (ARfD 0.0025mg/kg bw/day) and risk assessment methodologies (PRIMo rev 2), apples are 666% of the ARfD, using an HR value of 0.17mg/kg (15 trials). Therefore, the EU cannot support the adoption of the draft MRL for apple.

**DRAFT MAXIMUM RESIDUE LIMITS FOR PESTICIDES**

**AT STEP 5 OF THE CODEX PROCEDURE**

The EU supports the adoption of the Proposed Draft MRLs with the **following exceptions:**

**FLUOPICOLIDE (235)** – due to intake concerns the EU does not support the adoption of the proposed draft MRLs for celery, head cabbage and leafy vegetables.

**HALOXYFOP (194)** – due to the EU chronic intake concerns some commodities were only advanced to Step 5. The EU would like to maintain its reservation to the adoption at Step 5 of the proposed draft MRLs for all the commodities.

**Fluopicolide (235):** The EU has set a lower ARfD than JMPR. Using EU endpoints and risk assessment methodologies, there are intake problems for head cabbage, scarole, kale, celery Chinese cabbage, witloof, lettuce; spinach, purslane. There is a problem even with the

variability factor of 5. Therefore, the EU opposes the advancement of the proposed draft MRL for head cabbage due to intake concerns.

Even when using JMPR endpoints there are also intake problems for scarole, kale, celery and Chinese cabbage. Therefore, the EU opposes the advancement of the proposed draft MRLs for these commodities.

**Haloxifop (194):** The EU did not support the advancement of part of the proposed draft MRLs to Step 5/8 due to a chronic intake problem. The IEDI amounted to 217% of the ADI of 0.0007 mg/kg bw/day established by JMPR, using the European consumption data as compiled in the EFSA PRIMo model rev.2.

Using the EFSA PRIMo model rev.2. the EU ADI of 0.00065 mg/kg bw/day is exceeded with up to 233 % for an UK infant. Milk appeared to be critical in the chronic dietary exposure. The STMR value for milk used in the calculation is 0.033 mg/kg.