

European Union Comments
CODEX COMMITTEE ON PESTICIDE RESIDUES
49th Session
Beijing, 24 – 29 April 2017

AGENDA ITEM 10 a)

Establishment of Codex Schedules and Priority Lists of Pesticides

Mixed Competence
European Union Vote

The European Union and its Member States (EUMS) would like to thank Australia and Germany for the preparation of the schedules and priority lists of pesticides (2018-2021).

A. SCHEDULES AND PRIORITY LISTS 2018-2021

Scheduling criteria

The EUMS would like to support the scheduling criteria as they are used for 2018 and support their use for 2019 and the following years.

Balance between new evaluations and periodic reviews

The EUMS would like to reiterate its last year comments that the current scheduling practices and more particularly the ratio between new evaluations and periodic reviews is leading to an increased backlog: based on 200 pesticide compounds in the Codex system, this would result in an average time between reviews of about 40 years (and not yet taking into account that new compounds are added every year).

The EUMS understand that public health concerns should be the preferred indicator to prioritise periodic reviews rather than the time elapsed since the last periodic revision (15 year rule). However, the identification of such health concerns is not systematic for substances that have not been reviewed for a long time and the periodic review itself can be in certain cases the only way to identify such health concerns and to take appropriate action to address them.

Since the annual schedule for JMPR evaluation may be subject to late modification due to lack of data/support of certain compounds, the EUMS would like to emphasise again that in the event of the withdrawal of a compound from the priority list for periodic review, such compound is systematically replaced by a compound also subject to periodic review and not by a new evaluation. The EUMS would oppose to the replacement of a compound scheduled for periodic review by a new compound as the ratio new compound and periodic reviews should be preserved by all means.

2017 Schedule for JMPR evaluations

The EUMS welcome the 2017 CCPR Schedule of JMPR Evaluations, which includes seven new compounds and five periodic reviews. The EUMS note that the 2017 schedule corresponds to a ratio between new evaluations and periodic reviews of 1.4:1 (new compound: periodic reviews). The EUMS welcome the effort made to correct this ration in favour of more periodic reviews.

B. FINALISING THE 2018 PROPOSED SCHEDULE

The EUMS note that the 2018 schedule would lead to a ratio of 2:1 (new compound: periodic reviews) and would have appreciated the same level of effort as for the 2017, for which a ratio was 1.4:1 was achieved.

New compounds

The EUMS agree with the proposed schedule and would like to add comments for the following compounds:

- Tricyclazole, quinalphos, iprobenfos and hexaconazole (170): these compounds should not be listed yet and re-scheduled until the respective nomination forms will be provided.
- Ethion (24): There is a contradiction in the MRL tables. Ethion is listed in table 1 "List of Pesticides whose MRLs or GLs Have Been Withdrawn by the Codex Alimentarius Commission and for Which no MRLs Have Been Proposed" having at the same time CXLs for spices. Ethion is either a compound for which the CXLs should be withdrawn, or a compound, which needs a periodic review as soon as possible due to its last evaluation in 1990 for toxicology.

New uses and other evaluations

The EUMS agree with the proposed schedule.

Periodic Reviews

The EUMS note that 4 periodic reviews are finally selected for 2018. With respect to the above comment on chapter A – Schedules and priority lists 2018-2021 about the balance between new evaluations and periodic reviews, the EUMS consider as the minimum number of annual periodic review would be 4.

For bromopropylate, as proposed in CL 2017/12, the EUMS support the removal of this compound from the CCPR pesticide list and the revocation of all its CXLs.

C. PUBLIC HEALTH CONCERNS

The EUMS would like to inform the Committee that since the last CCPR meeting, public concern forms have been submitted to the JMPR secretariat/eWG on priorities for the following compounds:

- dicloran (83): important exceedance of ADI and ARfD for many commodities, toxicological concerns about impurities
- amitraz (122): important exceedance of ADI and ARfD for many commodities
- phosalone (60): important exceedance of ADI and ARfD for major commodities
- dimethoate (27): exceedance of ARfD for citrus, data gaps concerning certain metabolites
- dithiocarbamates (105) (ferbam, maneb/mancozeb, propineb, thiram, ziram and metiram): exceedance of ADI, lack of ARfD
- quintozone (64): exceedance of ARfD for ginger root, uncertainties regarding the metabolites
- prochloraz (142): ARfD is four times lower in the EU based on studies that do not appear to have featured in the JMPR evaluation.
- diazinon (22): EU ADI 15 time lower than JMPR ADI - exceedances of ADI and ARfD
- guazatine (114): no ADI (no CXLs but GLs) EU ADI of 0.0048 mg/kg bw per d and ARfD of 0.04 mg/kg bw.
- bromide (47) (methyl bromide(52)): CXL not supported by adequate data, no ARfD

The EUMS support the prioritisation of these compounds for periodic reviews. The EUMS welcome the changes in the priority order that advanced the evaluation of certain of these compounds compared with the last year schedule and support the proposed priority order.

D. PERIODIC REVIEWS (UNSUPPORTED COMPOUNDS)

The EUMS are strongly in favour of a stringent approach for deleting compounds from the system that are no longer supported by a manufacturer. Consequent withdrawal of the corresponding CXLs will contribute to reducing the number of substances for which a periodic review is overdue.

The EUMS therefore support the removal from the CCPR pesticide list and the revocation of CXLs for all the compounds for which no data are provided.

E. NATIONAL REGISTRATION FOR COMPOUNDS LISTED IN TABLES 2A AND 2B

The EUMS provided the Chair of the e-WG with the country-specific list of current national registration status of pesticides listed in Tables 2A and 2B, as requested by the Circular Letter (CL 2017/18-PR).

The EUMS note that this task constitutes a new workload for Codex Members.

TABLE 2A: PRIORITY LISTS OF PERIODIC REVIEWS – 2019-2021

2020 schedule

Diazinon (22) : In the interim JMPR 2016 only a toxicological assessment took place. The EUMS are of the opinion that an evaluation of the residue behaviour is still necessary.

Methidathion (51): The active substance is scheduled for the 2017 periodic review. For this reason, the EUMS are of the opinion that the periodic review should be deleted in Table 2A for the year 2020. If a periodic review will take place in 2017, the supported uses of mango and peaches are falling within the category "New uses and other evaluations". If the periodic review fails in 2017 the CXLs will most likely be recommended for revocation in 2018. In plenum of CCPR 2018 Members and Observers have the opportunity to ask for the application of the 4-year rule. At that time, the CCPR should decide on scheduling for mango and peaches.

TABLE 2B: PERIODIC REVIEW LIST (COMPOUNDS LISTED UNDER 15 YEAR RULE BUT NOT YET SCHEDULED OR LISTED)

The active substances fenthion (39), disulfoton (74) and dinocap (87) are listed in Table 2B falling under the 15 year rule but are not yet scheduled or listed. In this list, no support by the manufacturer is indicated. The missing support is indicated for at least two years. The EUMS are of the opinion that their CXLs should be recommended for revocation during the 2018 CCPR meeting unless substantiated support will be lodged until that meeting.

The active substances fenbuconazole (197), parathion-methyl (59), 2,4-D (20) and piperonyl-butoxide (62) are listed in Table 2B falling under the 15 year rule but are not yet scheduled or listed. These substances await advice on supported commodities while toxicological evaluations are 20 years or older. In case no support is lodged until the 2018 CCPR meeting, the EUMS would propose to recommend revocation two years later, at the 2020 CCPR meeting.