

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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WORLD
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Agenda Item 5

CX/PR 10/42/03-Add. 1
March 2010

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Forty-Second Session

Xi'an, China, 19 - 24 April 2010

COMMENTS on the Draft and Proposed Draft Maximum Residue Limits for Pesticides in Foods and Feeds at Steps 6 and 3, submitted by Australia, Brazil, Canada, Cuba and USA

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

Cuba

Cuba approves the cl09_33e 15 document.

USA

A. Transparency

JMPRs continued efforts to make it clear how they derived the recommended MRLs are appreciated. For example, the explanation of febuconazole/blueberries is clear and understandable. The maximum residue level estimate derived from use of the NAFTA calculator was 0.4 mg/kg (95/99 Rule and UCLMedian95th). The JMPR estimated a higher value at 0.5 mg/kg and provided the following: “The maximum application rate in the trials was 25% less than that specified in the matching maximum GAP. The Meeting considered that the estimate derived from use of the calculator may not accommodate all [label] uses of fenbuconazole in blueberries and agreed that a higher maximum residue level recommendation was warranted.”

Nevertheless there remains some unevenness in the effort, for example the explanation for haloxyfop/peas is not clear. For haloxyfop/peas, the JMPR estimated 1, based on the results of 16 trials. The calculator yields an estimate of 1.8 (2 rounded). The JMPR explains that the calculator value “appears to be higher than necessary.” This is not a reasonable explanation, especially since the JMPR has repeatedly stated that the NAFTA calculation works very well above 15 data points. The highest residue was 0.75 mg/kg, so 2 mg/kg seems plausible, and the subjective rationale for its rejection is not adequate. In another example with fluopicolide/fruited vegetables (pepper data), the JMPR selected 1 mg/kg over the calculator recommendation of 0.8 mg/kg based on consideration of “initial residue deposit data.” A few words of further explanation would be useful to make it clear what this means.

Regarding the use of the MRL calculator, there still appears to be some lack of recognition of the importance of the use of an agreed upon tool as a potential aid to assist in efforts to harmonize MRLs. For example, the NAFTA calculator was developed as the result of experience in the NAFTA joint reviews where different residue chemists, when examining the exact same data (one in Canada and one in the U.S.), would often come up with different proposed MRLs. After much work to agree on the calculator and the associated instructions for developing MRL recommendations, the calculator provided a tool to aid in harmonization efforts—not because it dictates a result, but because it provides a starting point and a presumption that unless there is a good reason not to use the result of the calculator, the result would be used. In cases where it is not used, the reason is documented for all to see and understand.

The view of the JMPR seems to be that the tool is not the starting point to be used unless there is a good reason not to, (a view that might help in global MRL harmonization efforts), but rather a hoop to jump through on the way to recommending the MRL that they were going to recommend anyway. While we believe this approach is counterproductive to the spirit of MRL harmonization, it should be noted that, in many cases, the MRL that JMPR recommends is the same as what the calculator method recommends and, in all cases, there is now a much more thorough explanation of the basis for the JMPR MRL recommendations. This information is very useful to other authorities as they consider the most appropriate MRL in their situation and it is very useful to the CCPR risk managers who can now more clearly understand the basis of the JMPR MRL recommendations. Again, the US very much appreciates the effort that has been made and anticipates that this level of effort will continue and be enhanced by future JMPR meetings.

Brazil

Brazil supports the JMPR recommendations and informs that some MRLs are different due the national GAPs and risk assessment performed by the Brazilian authorities according to the current legislation.

Carbaryl (8)

Australia

Based on the intake calculations of the 2002 JMPR, Australia does not support the advancement of the MRL for cherries beyond Step 6, while new data for cherries are submitted to JMPR (para. 62 ALINORM 09/32/24).

Paraquat (057)

Australia

Australia supports advancement of the MRLs for rice and rice straw and fodder, dry to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs.

Canada has no objection to the recommended JMPR MRLs.

Canada has completed its re-evaluation of carbaryl and is soliciting further data/information from stakeholders. For further information, please consult the Health Canada website

(http://www.hc-sc.gc.ca/cps-spc/pest/part/consultations/_prvd2009-14/carbaryl-eng.php)

USA

No comment.

Chlorothalonil (081)

Canada

Canada has no objection to the proposed JMPR ADI and AR/D for the parent and the major metabolite (4-Hydroxy-2,5,6-trichloroisophthalonitrile).

Chlorpyrifos-methyl (090)

Australia

Based on the long-term intake calculations of the 2009 JMPR, Australia does not support the advancement of the MRL recommendations. However, Australia notes that the long-term intake concerns identified by the 2009 JMPR might be resolved if alternative GAP were made available. Australia suggests the CCPR request countries to submit alternative GAPs for the critical use; post-harvest treatment of grain, i.e. ideally GAP that is restricted to wheat and barley.

Australia also notes that the compound was a periodic re-evaluation by the 2009 JMPR and therefore suggests CCPR delete the previous MRL recommendations for barley, oats and rice currently at Step 7 and retain the new recommendations from the 2009 JMPR at Step 5, pending review by the JMPR of alternative GAP.

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs, however, Canada has revised its MRLs for apples, grapes and tomatoes to 0.01 ppm based on a revised Canadian use pattern. For further information, please consult the Health Canada website

(http://www.hc-sc.gc.ca/cps-spc/pest/part/consultations/_pacr2003-03/index-eng.php)

USA

The USA residue definition for plant and livestock commodities is not harmonized with JMPR. The JMPR definition is chlorpyrifos-methyl only, whereas the US definition is Chlorpyrifos-methyl and 3,5,6-trichloro-2-pyridinol (40CFR180.419). The US notes that the proposed MRLs (Po) for barley and wheat are significantly lower than US tolerances; this situation is under consideration and may lead to a request for JMPR to consider additional data in the future.

Methomyl (94)

Australia

Australia supports advancement of the MRL for apple to Step 8

Canada

Canada has no objection to the recommended JMPR MRL.

Canada has conducted a preliminary assessment based on data and information reviewed. The preliminary assessments identified potential risks to the general population through dietary and drinking water exposure and to the environment. Canada is soliciting further data/information from stakeholders to complete the risk

and value assessments and propose regulatory action. For further information, please consult the Health Canada website (<http://www.hc-sc.gc.ca/cps-spc/pest/part/consultations/rev2009-02/index-eng.php>)

USA

The advancement of the apple MRL is supported, given the analysis of the 2009 JMPR (General Consideration 3.6). The USA has a tolerance of 1 ppm for apple.

Carbofuran (096)

Australia

The 2009 JMPR reconsidered residue data and the short-term intake estimates associated with the mandarin, oranges sweet, sour and banana MRL recommendations.

Australia notes the consideration of alternative GAP for citrus fruit by the 2009 JMPR has allowed the recommendation of MRLs that resolve dietary intake concerns and therefore suggests deletion of the MRLs for mandarin and oranges, sweet, sour currently at Step 7 and progression of the recommendations of the 2009 JMPR for citrus to Step 8.

Refinement of the short-term intake estimate for bananas by the 2009 JMPR did not lead to exposure estimates below the ARfD in the case of children. Australia supports deletion of the MRL recommendation for banana.

Canada

Canada is proposing phase-out of carbofuran products in Canada and revocation of all MRLs. An evaluation of available scientific information found that, under the current conditions of use, carbofuran products pose an unacceptable risk to human health and the environment, and therefore do not meet Canada's current standards for human health and environmental protection. As a result, all uses of carbofuran are proposed for phase-out. This includes registered uses on canola, mustard, sunflower, corn (sweet, field and silage), sugar beet, green pepper, potato, raspberry and strawberry as well as previous temporary emergency uses on turnip and rutabaga. For further information, please consult the Health Canada website

(<http://www.hc-sc.gc.ca/cps-spc/pest/part/consultations/prvd2009-11/index-eng.php>)

USA

While no new MRLs were considered by the JMPR, the acute reference dose was reconsidered (General Consideration 3.2) and monitoring data for orange, mandarin, and banana were reviewed. The JMPR concluded that the residue levels for banana may be unsafe for children (acute dietary intake, 150%). Therefore the CXL for banana should be reduced to Step 6 and considered for revocation if new residue data and a more sensitive analytical method are not provided.

It should be noted that EPA has concluded that dietary, worker, and ecological risks are unacceptable for all uses of carbofuran. EPA's revocation of carbofuran tolerances became effective on December 31, 2009. For additional information please consult:

http://www.epa.gov/oppsrrd1/reregistration/carbofuran/carbofuran_noic.htm

U.S. EPA tried to ensure that the JMPR, in making their decision, had access to all of the toxicological data that were available to the U.S. EPA. It is our understanding that JMPR did have all of the information. Further, it appears that JMPR used the same study the US used to select the endpoints and, in fact, the endpoints selected were the same. The differences in the acute and chronic RfD's were the result of the use of different safety factors.

Phorate (112)

Australia

Australia notes that additional data for processed potato was evaluated by the 2009 JMPR but that dietary intake concerns still remain. Australia supports retention of the MRL at Step 7 until short-term dietary intake concerns are satisfactorily resolved.

USA

The USA suggests retention of the MRL for potato at Step 7 (no advancement), given the results of the refined dietary intake analysis by the 2009 JMPR (General Consideration 3.7). The acute reference dose

continues to be exceeded. The USA has the same MRL/tolerance of (0.2 mg/kg) for phorate on potato and has no acute dietary intake concerns.

Cypermethrin (118) includes alpha- and zeta-cypermethrin

Australia

Australia supports advancement of all MRLs recommended by the 2009 JMPR to Step 5/8.

Australia notes that the MRL for asparagus should remain at Step 7 until additional data from Thailand is evaluated by the 2011 JMPR.

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs.

Canada has no objection to the recommended JMPR MRL.

USA

No comment.

The MRL for asparagus should remain at Step 5/6, pending data submission from Thailand.

Oxamyl (126)

Australia

Australia notes the 2008 JMPR concluded that there was insufficient data to support alternative GAP assessments for citrus, cucumber, melons (except watermelon) and peppers. Australia supports retention of these MRLs at step 7 awaiting a periodic re-evaluation by JMPR scheduled for 2012.

Triadimefon (133)

Australia

Australia notes that the 2009 JMPR were unable to use the alternative GAP approach for triadimefon residues in grapes as high residues would result from all available GAPs. Australia recommends deletion of the MRL currently held at Step 7.

Prochloraz (142)

Australia

Australia notes consideration of alternative GAP by the 2009 JMPR has resolved dietary intake concerns. Australia therefore suggests deletion of the previous MRL recommendation of 40 mg/kg at Step 7 and progress the new recommendation of the 2009 JMPR of 3 mg/kg to Step 5/8.

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs.

USA

Prochloraz is not registered in the USA.

Triazophos (143)

Australia

Australia notes that 41 CCPR decided to retain the MRL for soya bean (immature seeds) at step 7, pending the JMPR review of data from Thailand concerning residues in the edible portion.

Carbosulfan (145)

Australia

Australia notes the consideration of alternative GAP for citrus fruit by the 2009 JMPR. under the item for carbofuran. The reconsideration has allowed the recommendation of MRLs that resolve dietary intake

concerns. Australia therefore suggests deletion of the MRLs at step 7 for carbosulfan in oranges, sweet, sour and mandarin and progression of the recommendations of the 2009 JMPR for carbofuran in citrus to step 8.

Benalaxyl (155)

Australia

Australia supports advancement of all MRLs to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI, AR_fD and the recommended JMPR MRLs. Benalaxyl is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

USA

Benalaxyl is not registered in the USA.

Cyfluthrin/beta-cyfluthrin (157)

Australia

Australia notes following consideration of alternative GAP for cabbages head and broccoli by the 2009 JMPR, new MRL recommendations have not been made. Australia notes that the recommendations from the 2007 JMPR for cabbage head and broccoli were returned to Step 6 at the 41st session of the CCPR with a consideration to withdraw the recommendations at the 42nd session if no alternative GAP was available.

Australia does not support the advancement of the MRL recommendations for cabbage head and broccoli beyond Step 6 and suggests that the recommendations be deleted.

Canada

Canada has no objection to the proposed JMPR ADI, AR_fD and the recommended JMPR MRLs.

Canada has no objection to the recommended JMPR MRLs.

USA

Based on the alternative GAP considerations by the 2009 JMPR (General Consideration 3.4), the USA supports withdrawal of the MRL recommendations for cabbages, head, and broccoli.

Triadimenol (168)

Australia

See comments on triadimefon (133) above.

Buprofezin (173)

Australia

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

Canada

Canada has no objection to the proposed JMPR ADI, AR_fD and the recommended JMPR MRLs. Buprofezin is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

USA

The JMPR did not estimate an MRL for *coffee*, noting that they considered the data to be insufficient. However, they did not explain why they considered the data to be insufficient. The USA believes the data should be considered sufficient and will submit a Concern Form requesting an explanation and reconsideration of the data. The basis on which we think the data should be reconsidered is explained in detail in the concern form.

Submitted by: USA			
Date: 02/15/2010			
Pesticide/ Pesticide Code Number	Commodity/ Commodity Code Number	MRL (mg/kg)	Present Step
Buprofezin/173	Coffee beans/SB716	None	None
<i>Is this a Request for Clarification? Yes</i>			
<i>Is this a Concern? Yes</i>			
<i>Is this a Continuing Concern? No</i>			
<p>Concern (<i>Specific statement of reason for concern to the advancement of the proposed MRL.</i>)</p> <p>The 2009 JMPR considered field trial residue data for buprofezin on coffee beans. According to the Report, there were four (4) US trials in the State of Hawaii at the GAP with residues of 0.10, 0.12, 0.16, and 0.24 mg/kg. (An apparent error in the Evaluation is noted, where results for only two trials are underlined; four should be underlined.) The JMPR concluded in its Report that 4 trials are inadequate to estimate an MRL for coffee.</p> <p>The USA maintains that 4 trials, while minimal, are acceptable for setting an international trade standard. Coffee in the USA is produced only in Hawaii, and thus the crop field trial requirement in the USA is that the trials be located in Hawaii. Hawaii has relatively small agricultural acreage (1,110,000 acres total) in a single climate zone, and four trials for a commodity from this region is reasonable. Moreover, coffee is a minor commodity for the US, with a total of 6500 acres producing about 7,000,000 pounds per year.</p> <p>The USA also notes that at one trial location separate plots were treated with high volume and low volume sprays (at the same kg ai/ha) with similar results. Thus, within the trials the water volume variable was addressed.</p>			
<p>Request for Clarification (<i>Specific statement of clarification requested.</i>)</p> <p>Please reconsider the supervised field trial data and determine if an MRL estimate can be made based on the four trials.</p>			
<i>Do you wish this Concern to be Noted in the CCPR Report? Yes</i>			
<p>Data/Information (<i>Description of each separate piece of data/information which is attached or will be provided to the appropriate JMPR secretary within one month of the CCPR meeting.</i>)</p> <p>No additional information/data, but a request for reconsideration of the supervised trial results and estimation of an MRL for coffee beans.</p>			

Cadusafos (174)

Canada

Canada has no objection to the proposed JMPR ADI and AR/D. Cadusafos is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

Hexythiazox (176)**Australia**

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

Canada Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs. Hexythiazox is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

USA

The USA residue definition for plant commodities is not harmonized with JMPR. The JMPR included parent only for plant commodities, whereas the USA included hexythiazox, and its metabolites containing the (4-chlorophenyl)-4-methyl-2-oxo-3-thiazolidine moiety expressed as parent compound.

The USA notes that JMPR was unable to estimate an MRL for hops because of insufficient trial data. Additional data will be sought for a future consideration by JMPR.

Bifenthrin (178)**Canada**

Canada has no objection to the proposed ADI and ARfD. Bifenthrin is currently under review for Canadian domestic registration

Cycloxydim (179)**Canada**

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs. Cycloxydim is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

Tebuconazole (189)**Canada**

Canada has no objection to the recommended JMPR MRLs.

USA

The USA supports advancement of the various MRLs held at Step 6. The USA has no acute dietary intake concerns.

Fenpyroximate (193)**Australia**

Australia supports retention of the MRL for grapes at Step 7 pending re-evaluation of data for grapes scheduled for 2010. This follows the new ARfD recommended by the 2007 JMPR.

Haloxyfop and haloxyfop-R (194)**Australia**

Haloxyfop was evaluated by the 2009 JMPR under the periodic re-evaluation program. The MRL recommendations listed at Steps 4 and 7 have been superseded by those of the 2009 JMPR. Australia suggests that the old recommendations at Steps 4 and 7 for haloxyfop be deleted and those of the 2009 JMPR be progressed to Step 5/8.

Canada

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs. Haloxyfop is not registered for use in Canada, nor have any import MRLs been established, therefore Canada has not conducted an evaluation of this substance.

USA

Haloxyfop is not registered in the USA.

Fenbuconazole (197)**Australia**

Australia notes a short-term intake assessment was not conducted as the JMPR has yet to consider the need for an ARfD. Australia recommends that all MRLs proceed to Step 6 awaiting an outcome from JMPR on an ARfD, noting that some MRLs are set at the LOQ and some of the higher values are set for livestock feed items.

Canada

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs.

USA

The USA residue definition for plant and livestock commodities is not harmonized with JMPR. The JMPR definition is fenbuconazole, whereas the US includes two furanone metabolites (40 CFR 180.480).

Esfenvalerate (204)**Australia**

Australia notes and supports the Committee's decision to retain the draft MRLs for cotton seed, tomato and wheat at Step 7 awaiting the phase-out of fenvalerate.

Methoxyfenozide (209)**Australia**

Australia supports advancement of all MRLs to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs.

USA

The JMPR failed to estimate an MRL for cucumber, summer squash and melon (or cucurbit vegetable group), noting that the field trial data represented application rates in excess of the US label. The US will submit a Concern Form. Based upon our understanding of the situation, we believe that it is a risk management decision on whether to establish MRLs based on the available data for this reduced risk chemical which poses no safety concerns based on the available residue trial data which is at application rates at 1.55 of the maximum GAP. We will ask CCPR to direct the JMPR to estimate MRLs based on the available data and provide their input on whether and how the estimations should be used for MRL establishment. This information would then be considered by the CCPR in determining whether to advance any MRL recommendations. We believe this is more appropriate than the current situation in which JMPR simply states, "As the application rate did not match the GAP, the Meeting could not estimate a maximum residue level."

Submitted by: USA			
Date: 02/15/2010			
Pesticide/ Pesticide Code Number	Commodity/ Commodity Code Number	MRL (mg/kg)	Present Step
Methoxyfenozide/209	Melon (except watermelon)/VC46 Cucumber/VC424 Summer squash/VC431	None	-
<i>Is this a Request for Clarification? Yes</i>			
<i>Is this a Concern? Yes</i>			
<i>Is this a Continuing Concern? No</i>			
<p>Concern (<i>Specific</i> statement of reason for concern to the advancement of the proposed MRL).</p> <p>The 2009 JMPR considered field trial residue data for methoxyfenozide on several cucurbits: cantaloupe (7 trials); cucumber (8 trials); summer squash (6 trials). The JMPR stated that the field trial application rate exceeded 120% of the GAP (label), and that therefore the data could not be used to estimate an MRL for the individual commodities.</p> <p>The US agrees that the total field application rates were at 155% of the GAP and that all other GAP conditions were met. The residues determined were most likely somewhat higher than those from conducting the studies at 100 – 120% of GAP, where 120% GAP is commonly used as an upper limit. However, for purposes of international trade, where the residue levels are shown to be safe from JMPR dietary risk assessment analyses, a standard based on these trials should be established. It would be <2 X the MRL from the MRL obtained from studies conducted exactly at the GAP.</p> <p>This exaggeration seems minor when compared to all the uncertainties in the field trials and in analyses and in MRL estimation procedures. For example, cucurbits are very rapidly maturing crops, and the level of residue will therefore fluctuate considerably in a short time interval with the size of the cucumber or squash or melon.</p>			

Alternatively, a correction could be applied to reduce the exaggeration to 120% of GAP, that is 120/155 X MRL, or 0.77 X MRL estimate from exaggerated field trials.

The US notes that this issue is important because methoxyfenozide is a new, lower risk chemical. It was accepted for review and registration by the US EPA under the Reduced Risk Pesticide Initiative by demonstrating a lower risk to the environment and humans compared to the alternative pesticides currently in the market. Thus, the US believes that every effort should be made to establish international trade standards for this pesticide so that it may be used on foods that will be traded in international markets.

Because there are two competing concerns involved: (1) the importance of following established practice in JMPR (that the field trial data should be within 120% of the label GAP) and (2) the importance of establishing a standard for a new, safer pesticide for which there are no risk concerns the US believes that the questions which have been raised are risk management questions that should, ultimately, be decided by the CCPR in its risk management role.

Thus, the US Delegation will request the CCPR to instruct the 2010 JMPR to estimate MRLs for cucumber, summer squash, and melon based on the data previously reviewed and to provide a full discussion on any issues that the JMPR has noted surrounding the estimated MRLs. The 2011 CCPR would then consider the estimated MRLs along with the estimation issues and decide, in their role as risk managers, whether or not to advance the MRL estimates.

Request for Clarification (Specific statement of clarification requested).

Please reconsider the supervised field trial data in relation to the slight exaggeration of the GAP application rate and estimate MRLs. The Report to the 43rd CCPR (2011) should include the MRL estimates along with any JMPR issues.

Do you wish this Concern to be Noted in the CCPR Report? Yes

Data/Information (Description of each separate piece of data/information which is attached or will be provided to the appropriate JMPR secretary within one month of the CCPR meeting.)

No additional information/data, but a request for reconsideration of the supervised trial results and estimation of MRLs for cucumber, melon, and summer squash.

Metalaxyl-M (212)

Australia

Australia notes the Committee decided to retain all the draft MRLs at Step 7, awaiting the periodic re-evaluation of metalaxyl by JMPR in 2013.

Indoxacarb (216)

Australia

Australia supports advancement of all new MRLs to Step 5/8.

Based on the short-term intake calculations of the 2009 JMPR for leaf lettuce, Australia considers the existing CXL for this commodity should be revoked while noting the comments of the JMPR that alternative GAP was not available.

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs.

Indoxacarb is not registered for use in Canada due to insufficient information.

USA

No comment.

Boscalid (221)

Australia

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

Canada

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs.

Canada has no objection to the recommended JMPR MRLs. (Step 6)

USA

The USA residue definition for livestock commodities is not harmonized with the JMPR definition. The US includes nicotinamide and its glucuronic acid metabolites as part of the definition, JMPR has only the parent boscalid (40CFR 180.589). The USA agrees with the JMPR procedure for the estimation of rotational crop MRLs.

The USA supports the MRL recommendations of the 2009 JMPR for banana and kiwi.

Zoxamide (227)

Australia

Australia supports advancement of all MRLs to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs.

USA

No comment.

Prothioconazole (232)

Australia

Australia supports advancement of all MRLs to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI, ARfD and the recommended JMPR MRLs for both the parent compound and the metabolite. Canada has established MRLs and set toxicological endpoints for the parent compound only to cover both the parent and metabolite.

USA

The US agrees with the proposed MRLs.

Fluopicolide (235)

Australia

Australia supports advancement of all MRLs to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI and AR/D for the parent and the major metabolite (2,6-dichlorobenzamide). Also, Canada has no objection to the recommended JMPR MRLs. Fluopicolide is currently under review for Canadian domestic registration

USA

The USA notes that slight difference in Codex and US Classification systems leads to different MRL/tolerance estimates for the Brassica vegetables: flowerhead Brassica vs Group 5a head and stem brassica.

Metaflumizone (236)

Australia

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

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs.

Metaflumizone is not registered for use in Canada due to insufficient information.

USA

The US notes that many trials from the USA could not be evaluated because the pending registration in the USA was withdrawn.

Spirodiclofen (237)

Australia

Australia supports advancement of all MRLs to Step 5/8

Canada

Canada has no objection to the proposed JMPR ADI, AR/D and the recommended JMPR MRLs.

USA

No comment.