

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 7a-d

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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Comments submitted by CropLife International

Agenda Item 7a-d

CropLife International appreciates the great work done by electronic working group (eWG) to further update and enlarge the Classifications proposed to CCPR for Class-C (feeds) and Class-D (processed commodities), and would like to present some aspects for consideration:

- The proposed subgroups for animal feeds and processed commodities are significantly different than existing national requirements for group/subgroup MRLs. With regard to processed commodities, CropLife International encourages the eWG to consider the extrapolations allowed in the OECD guidance document on Magnitude of Pesticide Residues in Processed Fractions to promote international harmonization and avoid MRL disharmony.
- CropLife International requests that the number of representative crops required for commodity groups and the related subgroups be pragmatically selected so MRLs for minor commodities in the groups are achievable. For example, according to the proposal, to obtain a crop subgroup MRL for cereal grain flour, residue data are requested wheat and barley and rice and sorghum grain and maize and sweet corn flours. In cases where the registered use rate and timing are similar for these five cereals, the residues in flour and other milled products are not expected to be significantly different.
- For crop groups and subgroups where no representative crops or commodities have been identified due to residue variability, we encourage the eWG to consider a pragmatic fit-for-purpose approach which would allow for the MRL for the crop group or subgroup to be set on a major crop or commodity which is known to generally have higher residues. Minor crops within the group or subgroup would then be covered as long as the dietary risk assessment is acceptable.
- CropLife International suggests adding a statement that a case-by-case justification for extrapolation from select crops to a group or subgroup will be considered for group/subgroups that do not have representative crops indicated when proposed with justification by the data submitter.