**Talking Points for the March 2016 Public Meeting for the US Delegation to the CCPR**
**April, 2016**

CCPR/April 2016 Provisional Agenda available at:

http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-48%252Fpr48_01e.pdf

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## Agenda Item 5(a) & (b) – Items of General Consideration by the 2015 JMPR and Responses to Specific Concerns Raised by CCPR

- *GENERAL CONSIDERATIONS*


2.1 EFSA Workshop, cosponsored by WHO and FAO, revisiting the IESTI equations ..... 3

2.2 Shorter than lifetime exposures ..... 4

2.3 Update on the revision of principles and methods for risk assessment of chemicals in food (EHC 240) ..... 4

2.4 A report on the joint FAO/WHO expert meeting on hazards associated with animal feed conducted from 12 to 15 MAY in Rome, Italy ..... 5

2.5 Minimum number of supervised field trials for MRL setting for minor crops ..... 5

2.6 Revision of the FAO Manual on the submission and evaluation of pesticide residues data for the estimation of maximum residue levels in food and feed ..... 6


What about regarding the items above: anything to ad

- *RESPONSES TO SPECIFIC ISSUES*


3.1.1 Buprofezin (173) ..... 7

3.1.2 Fenpropathrin (185) ..... 7

3.1.3 Imazamox (276) ..... 7

3.1.4 Methidathion (051) ..... 9

3.1.5 Propiconazole (160) ..... 9

3.2 Other matters of interest ..... 12


- **Buprofezin**
- **Fenpropathrin**- The U.S. previously submitted a concern form in order for JMPR to reconsider the decision against recommending a MRL for the use of fenpropathrin for raspberry. The U.S. felt that a

tolerance could be recommended, using the proportionality approach. However, the JMPR confirmed the previous decision to not recommend a MRL, noting that the proportionality approach cannot be used when dose rate and sampling after last application are different from GAP,.

- **Imazamox**- The US submitted a concern form regarding clarification as to the need for an ARfD for imazamox. The JMPR reviewed additional data submitted by the U.S., but reaffirmed the ARfD previously established for imazamox.
- **Methidathion**
- **Propiconazole-** The US submitted a concern form with additional information for growth stages for wheat, oat and barley. As a result, the JMPR recommended MRLs for these commodities.

## Agenda Item 6 –Draft and Proposed draft Maximum Residue Limits for Pesticides

- The JMPR Meeting evaluated 29 pesticides of which 8 were new compounds and 4 were compounds that were re-evaluated within the periodic review programme of the CCPR. Five of the new compounds were nominated by the U.S. Delegation

- The U.S. will be submitting several concern forms to the Secretariats of FAO and WHO based on their reviews in 2015.

## Agenda Item 7 – Discussion paper on the impact of the relocation of Vigna spp under the Beans (dry) on the CXLs for Peas (dry).

- As noted in the 2015 CCPR Report (REP15/PR, Para 126), the Committee agreed to retain two separate codes for Beans (*Phaseoulus* spp.) immature and Beans (*Vigna* spp.) immature under Sub-groups 14A and 14C and Thailand would prepare a discussion paper on the impact of the relocation of *Vigna* spp. under beans (immature) on the CXLs for peas (immature) for consideration by the next CCPR.

- At this time this paper is not ready for consideration.

## Agenda Items 8(a)/8(b) - Draft revision of the Classification of Food and Feed at Step 7: Selected vegetable commodity groups (Group 015 - Pulses) and Agenda Item 8(b) - Proposed draft revision of the Classification of Food and Feed at Step 4: Selected vegetable commodity groups (Group 014 Legume vegetables).

- This is part of the ongoing effort to revise all of the crop groups in the Food and Animal Feeds Classification. The U.S. has co-chaired or chaired this workgroup from the start of this effort and has provided much of the documentation for the proposed crop groups and strongly supports this project.

- This year comments were only requested on the options for the location of groundnuts, i.e. Bambara and Kerstin (and possibly peanuts) within the Classification system for both dry (mature) and immature commodities (REP15/PR, paras 122, 126) and recommendations of the discussion paper on the impact of the relocation of Vigna spp under the Beans on the CXLs for Peas for both dry (mature) and immature commodities (REP15/PR, paras 122, 126) (see agenda item 7).

- For Group 015 – Pulses, the U.S. does not oppose the separate subgroup – Dry underground legumes

proposed for inclusion in the Codex crop grouping scheme. However, the U.S does not propose to include dry underground legumes in its revised Legume Vegetable Group for beans and peas since edible parts develop underground with no direct exposure to pesticide applications.

- For Group 014 – Legume vegetables, the U.S. does not oppose the separate subgroup – Underground beans and peas for inclusion in the Codex crop grouping scheme. However, the U.S does not propose to include underground beans and peas in its revised Legume Vegetable Group for beans and peas since edible parts develop underground with no direct exposure to pesticide applications.

- Since the paper on the analysis on the impact of the relocation of *Vigna* spp is not available the U.S. has not developed a position at this time but will consider the paper once available.

## Agenda Item 8(c) – Proposed draft revision of the Classification of Food and Feed at Step 4: Selected vegetable commodity groups (Group 011 - Fruiting vegetables, cucurbits).

- The U.S. participated in the EWG and provided comments and indicated that the U.S. would prefer the Fruiting Vegetable, Cucurbits Group be divided into an 11A. Melon subgroup and 11B. Squash/Cucumber subgroup. However, there appeared to be little support for this option. Therefore, U.S. indicated it could support the option with two subgroups including 11A. Cucumber and Summer Squashes and 11B. provided any compromise option did not include the need for additional data on another representative crop

- Compromise Option 3:
  - Subgroup 011A. Fruiting vegetables, Cucurbits such as Cucumbers and Summer Squashes
  - Subgroup 011B. Fruiting vegetables, Cucurbits such as Melons, Pumpkins and Winter Squashes
  - Is the option that has been put forth for consideration by the CCPR.

- However, after reading the Agenda Item 8(g) - Proposed draft Table 2 - Examples of selection of representative commodities, the proposal is for representative commodities for cucumber, summer squash, melon and pumpkin or winter squash. The U.S does not agree with this proposal.

- The U.S. is opposed to the requirement of residue field trial data on winter squash or pumpkin. The U.S. can agree to the compromise option if the residue field trial generated for melon can be used to represent winter squash and pumpkin or if the representative commodity is melon or pumpkin or winter squash.

- The main purpose of this crop grouping effort is to allow for the use of crop groups to establish tolerances for multiple commodities, especially minor and specialty crops, based on data from representative commodities. In the U.S. winter squash and pumpkin have been represented by cucumber and summer squash since 1995 without any indication that the tolerances established have not been protective. The U.S. does not believe requiring additional residue field trial data for winter squash is necessary and that having these additional data will be informative and will likely result in fewer tools for growers.

- The U.S cannot support this compromise with the representative commodities as currently written.

## Agenda Item 8(d) – Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 020 – Grasses of cereal grains).

- The main issue regarding the cereal grains subgroup is the proposal of a small grains subgroup with the U.S. prefers or the establishment of separate subgroups for wheat, barley and pseudo-cereals. The U.S. is primarily concerned about a separate subgroup for pseudocereals.

- The CCPR have been asked to consider two compromise proposals:
    - From Canada that proposes a Subgroup 20A. Wheat, similar grains and pseudo-cereals (would include pseudo-cereals) (Wheat as representative commodity) and Subgroup 20B. Barley and similar grains (Barley as representative commodity); and
    - From Japan that proposes Subgroup 20A. Wheat, similar grains, and pseudo-cereals without husks (wheat as rep commodity) and Subgroup 20B. Barley, similar grains, and pseudo-cereals with husks (barley as representative commodity).

- At this time the U.S. still supports the creation of a single small grains subgroup. The U.S. agrees that the two proposals are preferred over the original proposal of three separate subgroups since there is no separate subgroup for the pseudocereal grains. However, the U.S. believes there is little value in separating the Small grains into a Wheat 20A subgroup and a Barley 20B subgroup.

- The U.S. does not see the value in having two separate subgroups where the crops are similar and the main difference between these groups is wheat and barley.

- The U.S. has agreed that there may be value to have both wheat and barley as representative commodities for the subgroup but still supports the creation of a single small grains subgroup.

- However, the U.S. will have additional internal discussions in preparation of the upcoming CCPR meeting and will consider if there is a preference for either of the compromise solutions.

## Agenda Item 8(e) – Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 021 - Grasses for sugars or syrup production).

- The U.S. notes that it has determined it will not be establishing this crop group in its own crop grouping scheme.

- However, the U.S. does not agree with the proposed additions to this group for corn (Zea mays) since it is already a member of the 020 Cereal Grains; Sugar beet roots which is already a member of 016 Root and tuber vegetables since it not appropriate to have the same commodity in more than one group.

- Additionally, the U.S. does not agree this group should include Leaves and canes [agave leaves, sweet sorghum], Roots [common polypody roots, yacon roots and Others [syrup from trunk sap including birches, manna ashes, maples and palms since these diverse group of crops are not appropriate for inclusion in a group since exposure to pesticides will not be the same.



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## Agenda Item 8(f) – Proposed Draft revision of the Classification of Foods and Animal Feeds at Step 4: Group 024: Seeds for Beverages and Sweets.

- The U.S. notes that it has determined it will not be establishing this crop group in its own crop grouping scheme.

- However, the U.S. does not agree with the proposals to add Basil seeds, Oilseeds such as canola seed and sunflower seed and to develop subgroups based on tree nuts, ground nuts, seeds that are protected (pods) and seeds that are exposed.

- These commodities are already included in other crop groups and these proposals to include them in this group do not appear to be based on the principles of crop grouping and expected pesticide residues but rather because the commodity might be used in beverages.

## Agenda Item 8(g) – Proposed draft Table 2 - Examples of selection of representative commodities (vegetable and other commodity groups) (for inclusion in the Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides to commodity groups) at Step 4

- As noted in agenda item 8(c), the U.S. does not agree with the proposed representative commodities for the Group 011 - Fruiting vegetables, cucurbits of cucumber, summer squash, melon and pumpkin or winter squash.

- The U.S. is opposed to the requirement of residue field trial data on winter squash or pumpkin. The U.S. can only agree to the compromise option 3 if the residue field trial generated for melon can be used to represent winter squash and pumpkin or if the representative commodity is melon or pumpkin or winter squash.

- The main purpose of this crop grouping effort is to allow for the use of crop groups to establish tolerances for multiple commodities, especially minor and specialty crops, based on data from representative commodities. In the U.S. winter squash and pumpkin have been represented by cucumber and summer squash since 1995 without any indication that the tolerances established have not been protective. The U. S. does not believe requiring additional residue field trial data for winter squash is necessary and that having these additional data will be informative and will likely result in fewer tools for growers.

- The U.S cannot support the compromise with the representative commodities as currently written.

- As noted in agenda item 8(d), the U.S. does not see the value in having two separate subgroups where the crops are similar and the main difference between these groups is wheat and barley.

- However, the U.S. has agreed that there may be value to have both wheat and barley as representative

commodities for the subgroup but still supports the creation of a single small grains subgroup.

## Agenda Item 9 - Discussion paper on performance criteria for suitability assessment of methods of analysis for pesticide residues

Pat B/ to fill in.

## Agenda Item 10 – Establishment of Codex Schedules and Priority Lists of Pesticides (CX/PR 16/48/14)

- On 1 December, 2015 the U.S. Delegation submitted new compound evaluations and reevaluations for consideration by the CCPR and review by the Joint Meeting on Pesticide Residues.
- These nominations included: seven new compounds for evaluation, three previously reviewed chemicals not currently scheduled for follow-up evaluation, additional uses for six chemicals currently scheduled for review, two requests for rescheduling, and one request to withdraw a nomination.
- The U.S. Delegation also clarified residue trial information or otherwise revised the current nominations for several compounds.
- Finally, the U.S. has requested that the CCPR consider a four-year extension for the cranberry CXL previously established for Chlorothalonil that is proposed for revocation in 2016 under the four-year rule.

**Additional Information, if questions are asked by the public:**

**2016**: MCPB (Withdrawal); Norflurazon (Reschedule to 2018); Buprofezin (Add papaya, avocado); Penthiopyrad (Reschedule blueberry, caneberry to 2018).

## Agenda Item 11 – Other Business and Future Work