WTO Workshop on Pesticide MRLs

Establishment of Codex MRLs
• Prioritization
• Scheduling
• Evaluation
• Key Issues
• Proposals

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Chair – CCPR Electronic Working Group on Priorities

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Prioritization: Purpose

CCPR shall base its risk management recommendations to CAC on JMPR’s risk assessment of the respective pesticides, considering, where appropriate, other legitimate factors relevant for health protection of consumers and for the promotion of fair practices in international food trade.

CXLs for pesticides used in crop protection can only be established if they pass a scientific evaluation by FAO and WHO in the JMPR.

Increasing demands for more evaluations every year requires the use of strict criteria to make the best use of JMPR’s limited capacity.
eWG Priorities’ roles

eWG Priorities tasked with:

1. preparation of draft Schedule of JMPR evaluations
2. maintenance of 4 Priority Lists (Tables)

THE TABLES

Table 1: new pesticides plus new uses and other evaluations for existing codex pesticides

Table 2A: Schedule of Periodic Review (criteria – 15 year rule and public health concerns and/or supported by manufacturer)

Table 2B: List of Periodic Reviews (criteria – 15 year rule)

Table 3: Record of Periodic Review

Table 4: Pesticide / Food combinations for which specific GAP is no longer supported

(CAC procedural Manual 24th edition)
Codex Step Procedure - timeline example:

Nomination with completed form due: 30 November 2016

CCPR Schedule and Priority List draft agenda paper: 1 January 2017

CCPR approves Proposed 2018 Schedule: April 2017 (CCPR49)

Commission adopts 2018 Schedule of Evaluations (STEP 1): July 2017

JMPR data call in for 2018 Schedule of evaluations: October 2017

JMPR conducts evaluations / meets (STEP 2) Sept 2018

JMPR report published: December 2018

CL for comments on JMPR proposals (STEP 3): March 2019

If no concerns, CCPR proposes draft MRLs to CAC (STEP 5/8): April 2019 (CCPR 50)

CAC adopts MRLs (to become CXLs): July 2019
Challenge: Increasing demand...

<table>
<thead>
<tr>
<th>Year</th>
<th>CCPR</th>
<th>CXLs</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>48</td>
<td>392</td>
</tr>
<tr>
<td>2015</td>
<td>47</td>
<td>349</td>
</tr>
<tr>
<td>2014</td>
<td>46</td>
<td>300</td>
</tr>
<tr>
<td>2013</td>
<td>45</td>
<td>328</td>
</tr>
<tr>
<td>2012</td>
<td>44</td>
<td>251</td>
</tr>
<tr>
<td>2011</td>
<td>43</td>
<td>286</td>
</tr>
<tr>
<td>2010</td>
<td>42</td>
<td>205</td>
</tr>
</tbody>
</table>
When prioritization was simpler: JMPR 2003 Schedule

<table>
<thead>
<tr>
<th>Toxicological evaluations</th>
<th>Residue evaluations</th>
</tr>
</thead>
<tbody>
<tr>
<td>New compounds</td>
<td>New compounds</td>
</tr>
<tr>
<td>cypropidinil</td>
<td>cypropidinil</td>
</tr>
<tr>
<td>famoxadone</td>
<td>famoxadone</td>
</tr>
<tr>
<td>methoxyfenozide</td>
<td>methoxyfenozide</td>
</tr>
<tr>
<td>pyraclostrobin</td>
<td>pyraclostrobin</td>
</tr>
<tr>
<td>Periodic re-evaluations</td>
<td>Periodic re-evaluations</td>
</tr>
<tr>
<td>carbosulfan (145)</td>
<td>acephate (095)/methamidophos (100)</td>
</tr>
<tr>
<td>paraquat (057)</td>
<td>fenithrothion (037)</td>
</tr>
<tr>
<td>terbufos (167)</td>
<td>lindane (048)</td>
</tr>
<tr>
<td></td>
<td>pirimiphos-methyl (086)</td>
</tr>
<tr>
<td></td>
<td>dodine (084)</td>
</tr>
<tr>
<td>Evaluations</td>
<td>Evaluations</td>
</tr>
<tr>
<td>pyrethrins (063)</td>
<td>carbendazim (072)/thiophanate-methyl (077)</td>
</tr>
<tr>
<td>dimethoate (027) - acute toxicity</td>
<td>carbosulfan (145)</td>
</tr>
<tr>
<td>malathion (049) - acute toxicity</td>
<td>dimethoate (027)</td>
</tr>
<tr>
<td>tebufenozide - acute toxicity</td>
<td>dicloran (083)</td>
</tr>
<tr>
<td></td>
<td>pyrethrins (063)</td>
</tr>
</tbody>
</table>
CCPR Schedules – measures post CCPR39

Electronic Working Group – all interested parties invited to participate

Operates throughout the year with formal broadcast email in September

Membership – all members and observers

Principles of openness, transparency and inclusivity

eWG operation specified in Codex Procedural Manual
Further Improvements To Tables

CCPR 41
• inclusion of commodity lists in the schedules and priority lists

CCPR 42
• inclusion of manufacturer identity

CCPR 43
• inclusion of number of field trials
• for new compounds, inclusion of registration status and MRL/LOQ status

CCPR 44
• for periodic reviews, inclusion of year of previous review and status of ADI and ARfD
• Table 2A and 2B established

CCPR 48
• NOMINATION WITH DATE STAMPING TO SUPPORT STRICT ADHERENCE TO NOMINATION AND SCHEDULING CRITERIA
## 2018 Proposed Schedule for JMPR evaluations

<table>
<thead>
<tr>
<th>Date Stamp</th>
<th>TOXICOLOGY</th>
<th>RESIDUE</th>
<th>Prioritisation criteria</th>
<th>Commodities</th>
<th>Residue trials provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Circa 2012 Priority 1</td>
<td>Chlorfenapyr Tox 2012</td>
<td>Chlorfenapyr [BASF] (254)</td>
<td>Registered MRLs &gt; LOQ ??</td>
<td>Bell peppers, eggplant, melon, papaya, soybean, soybean processed, tea, tomato, tomato processed, water melon</td>
<td>Bell peppers (8), eggplant (5), melon (8), papaya (5), soybean (10), soybean processed (3), tea (6), tomato (8), tomato processed (3), water melon (8)</td>
</tr>
<tr>
<td>6 Dec 2013 Priority 1</td>
<td>Ethiprole (999) (insecticide) [Bayer CropScience] – Germany</td>
<td>Ethiprole (999)</td>
<td>Registered MRLs &gt; LOQ</td>
<td>Coffee; corn/maize; rice; soybean and food of animal origin</td>
<td>Coffee (15); corn/maize (10); rice (12); soybean (10)</td>
</tr>
<tr>
<td>Pre 2014 [moved from 2015 at the request of manufacturer] Priority 1</td>
<td>Pyrflufquinazon (999) (insecticide) [Nihon Nohyaku] Japan</td>
<td>Pyrflufquinazon</td>
<td>Registered Japan; KOREA MRLs &gt; LOQ ??</td>
<td>Citrus; pome fruits; potatoes; stone fruits; grapes; tree nuts; melons; tea; grapes (table grapes, raisins, wine); fruiting vegetables, cucurbits; cotton; leafy vegetables; brassica leafy and head/stem vegetables</td>
<td>Almonds (10); pecans (10); grape (table) (24); raisin juice (if MRL not included under table grape); plum (18); peach (24); cherry (16); apple (24); pear (12); lemon (10); grapefruits (12); oranges (24); cantaloupe (12); cucumbers (14); summer squash (10); peppers (24); tomatoes (28); cauliflower/broccoli (12); cabbage (16); potatoes (33); cotton seed (24); tea (6) and corresponding animal commodity MRLs</td>
</tr>
<tr>
<td>25 March 2015 Priority 1</td>
<td>Norflurazon USA (herbicide) (999) [TessenderloKerley Inc.]</td>
<td>Norflurazon (Moved from 2016 at request of nominator)</td>
<td>Registered MRLs &gt; LOQ</td>
<td>Almond; apple; apricot; asparagus; avocado; blackberry; blueberry; cranberry; cherry (sweet/tart); citrus fruits group; cottonseed; grape; hazelnut; hops; nectarine; peach; peanut; pear; pecan; plums and prunes; raspberry; soybean; walnut</td>
<td>Almond: 7; apple: 8; apricot: 2; asparagus: 6; avocado: 3; blackberry: 1; blueberry: 6; cranberry: 5; cherry: 3; citrus fruits: 8; cottonseed: 10; filberts: 3; grapes: 14; nectarine: 2; peach: 4; peanut: 10; pear: 4; pecans: 4; plums: 6; raspberry: 6; soybeans: 22; walnuts: 2</td>
</tr>
<tr>
<td>2 Sept 2015 [Moved from 2017 on request] Priority 1</td>
<td>Pydiflumetofen SYN545794 (999) (fungicide) Canada [Syngenta]</td>
<td>Pydiflumetofen SYN545794 (999)</td>
<td>Registered – No (2014 status) MRL&gt;LOQ</td>
<td>Soybean seed; Pulses (dry beans, dry peas, lentils, chickpeas), grapes; fruiting vegetables; cucurbits; leafy vegetables; potato; corn; wheat; barley; oats, peanuts, apples, canola</td>
<td>Wheat (33 trials), barley (21 trials), oats (22 trials), canola (21 trials), grapes (12 trials), apples (8 trials), dry beans (11 trials), dry peas (10 trials), fruiting vegetables (tomato (12 trials), bell and non-bell peppers (9 trials)), leafy vegetables (head and leaf lettuce (16 trials), spinach (8 trials), celery (8 trials)), cucurbits (cucumber (7 field and 3 protected), squash (6 trials), cantaloupe (6 trials)), corn (field and popcorn (23 trials), peanuts (12 trials), soybeans (21 trials), potatoes (26 trials)</td>
</tr>
<tr>
<td>4 Dec 2015 Priority 1</td>
<td>Mandestrobin (999) USA (fungicide) [Sumitomo Chemical]</td>
<td>Mandestrobin</td>
<td>Registered, MRLs&lt;LOQ</td>
<td>Canola, Grape, Strawberry</td>
<td>Canola (23); Grape (16); Strawberry (10)</td>
</tr>
<tr>
<td>4 Dec 2015 Priority 1</td>
<td>Metconazole (999) [Valent USA Corporation, on behalf of Kureha Corporation Japan] (fungicide)</td>
<td>Metconazole</td>
<td>Registered US MRLs &gt; LOQ</td>
<td>USA- Stone fruit group; Blueberry; Banana; Garlic; Onion; Bulb; Legume vegetables; Pulses; Soya bean; Root and tuber vegetables1 (except Sugar beet (root)); Sugar beet (roots); Barley; Maize; Oats; Rye; Triticale; Wheat; Sugar cane; Tree nuts; Oilseed (except Cotton seed, Peanuts, Soya bean and Sunflower)*; Cotton seed; Peanuts; Sunflower seed; Meat (from mammals other than marine mammals); Mammalian fats (except milk fats); Edible offal (Mammalian); Milks; Poultry meat; Poultry fats; Poultry, Edible offal; Egg; Peanut oil, crude</td>
<td>USA- Banana (12), barley grain (28), blueberry (11), cotton seed (12), corn/maize (20), sweet corn (12), tree nuts (10), peanuts (14), soya bean (30), stone fruits (22), sugar beet roots (12), sugarcane cane (8), sunflower (12), oats (12), rape oilseed (16), dried shelled peas pulses (15), dry beans (19), triticale wheat (31), potato (32), fresh legumes, peas without pod (13), onion (4), garlic (3)</td>
</tr>
</tbody>
</table>

PLUS ANOTHER SEVEN PAGES FOR A SINGLE YEAR!
Prioritization And Scheduling Criteria

• Nomination form must be completed
• Dossier must address JMPR data requirements
• Must be registered for use (pesticide and uses)
• Listed commodities should be traded internationally
• Use must give rise to quantifiable residue levels
• Pesticide must not have been already accepted for consideration
• Product labels ready at JMPR data call-in

HIGHER PRIORITY MUST BE GIVEN TO NOMINATIONS WHICH FIRST MEET THESE REQUIREMENTS
Key requirements for periodic review

1. Pesticides not reviewed for 15 years will be listed.

2. Pesticides are scheduled for review if there is
   • public health concern or a residue trade disruption notification
   • support with a relevant data package and request to review.

3. All notifications must be accompanied with appropriate science-based evidence

4. Must notify the date of data package submission and which commodities are to be supported
   • Provide current labels arising from recent national re-evaluations
   • Advise if there is closely related chemical that can be evaluated concurrently
Revocation of CXLs

CXLs can be revoked following periodic review and ‘new use and other’ evaluations:

- Periodic review - proposed new MRLs are presented to CCPR for consideration. When new MRLs are adopted, the corresponding old CXL is revoked.

- Periodic review - Some commodities not supported. When CCPR considers the JMPR proposals, the CXLs for the unsupported commodities are revoked.

- Periodic review and New use / other evaluations - Crop grouping MRLs may be proposed and once adopted the relevant individual commodity CXLs are deleted.

- New use and other’ evaluation - new information may be provided on an existing commodity CXL. If a new proposal is adopted, the former CXL will be revoked

Deletion of compounds

- No known national registrations
- All CXLs revoked during periodic review
Compounds for which all CXLs revoked since 2002

2015/2016  diclofluanid (82), tolyfluanid (162), tecnazene (115), bioresmethrin (93) - no national registrations

2010/2011  vinclozolin (159), procymidone (136)

2008/2009  mevinphos (53)

2006/2007  fentin (40),

2004/2005  hexaconazole (170), ethion (34), bendiocarb (137)

2002/2003  monocrotophos (54), parathion – ethyl (58), phosphamidon (61), omethoate (55), mecarbam (124), propoxur (75), paclobutrazol (161), anilazine (163)

Circular Letter to be prepared: National Registrations Database
Conclusions

Demand for evaluations has increased sharply

Many more pesticides and uses are added, than are revoked

Members / observers must understand / adhere to nomination and scheduling criteria to support an effective CXL setting process

Further process improvements are the subject of ongoing eWG discussions

But even the best process cannot overcome significant existing capacity bottlenecks in the scientific evaluation and prevent delays in CXL review and establishment of new CXLs
Thank you very much for your kind attention