U.S. DRAFT POSITIONS

for the

Codex Committee on Pesticide Residues

50th Session
Haikou, China
April 9-14, 2018

These positions may be revised or updated prior to the Committee meeting.
Adoption of the Agenda

Background:
- The CCPR will review the Provisional Agenda and consider its adoption.

U.S. Position:
- The United States supports adoption of the Provisional Agenda as proposed.

Agenda Item 2
Appointment of Rapporteurs

Background:
- The CCPR will appoint a Rapporteur(s).

U.S. Position:
- The United States supports this action.

Agenda Item 3
Matters Referred to the Committee by the Codex Alimentarius Commission and Other Subsidiary Bodies

Background:
- The document outlines information and actions taken by the CAC in 2017 with regard to the proposals forwarded by CCPR 2017. It also includes matters for action by the CCPR in 2018.
- **MATTERS FOR INFORMATION ADOPTION OF STANDARDS AND RELATED TEXTS**
- **MATTERS FOR ACTION: BIOPESTICIDES, BIOFERTILIZERS AND BIOSTIMULANTS**
  - Chile requested guidance from the Commission on how the current lack of definitions and recommendations for biopesticides, biofertilizers and biostimulants should be addressed including the option of presenting a discussion paper on the subject to a suitable subsidiary body of the Commission.
  - CAC40 acknowledged the relevance of the issue and recommended that Chile submit a discussion paper on biopesticides, biofertilizers and biostimulants for consideration by the Committee on Food Labeling (CCFL), Committee on Pesticides Residues (CCPR) and Committee on Contaminants in Foods (CCCF).
- **MATTERS ARISING FROM THE 73RD SESSION OF THE EXECUTIVE COMMITTEE: CCPR and CCRVDF**
  - CCEXEC73 noted that the work of the Codex Committee on Residues of Veterinary Drugs (CCRVDF) included compounds used as both veterinary drugs and pesticides.
  - It was further noted that CCRVDF and CCPR could potentially be organized back-to-back and that the next opportunity would be 2020.
  - CCEXEC73 encouraged closer collaboration between CCRVDF and CCPR when considering MRLs for compounds used as both veterinary drugs and pesticides and invited the two Committees to explore innovative ways to foster such collaboration.
U.S. Position:

MATTERS FOR INFORMATION ADOPTION OF STANDARDS AND RELATED TEXTS
• The United States supports the actions taken by the CAC in adopting, revoking, and withdrawing the proposals the CCPR sent forward in 2017.

MATTERS FOR ACTION: BIOPESTICIDES, BIOFERTILIZERS AND BIOSTIMULANTS
• No document has been posted for the upcoming session.

MATTERS ARISING FROM THE 73RD SESSION OF THE EXECUTIVE COMMITTEE: CCPR and CCRVDF
• The United States welcomes closer collaboration between the two committees.

Agenda Item 4(a)
CX/PR 18/50/3
Matters of interest arising from FAO and WHO

Background:
• The document outlines matters of interest to CCPR related to FAO and WHO, in addition to 2017 JMPR Activities.
  o Improvement of chronic dietary exposure assessment
  o Acute probabilistic dietary exposure assessment for pesticide
  o Global Food Consumption Databases and ongoing activities to support countries to generate and to use data for risk analysis purposes

U.S. Position:
• The United States is actively engaged on CCPR matters of interest that relate to FAO and WHO and will develop positions on particular issues if warranted.

Agenda Item 4(b)
CX/PR 18/50/4
Matters of interest arising from other international organizations

Background:
• The document outlines the actions taken by other International Organizations.
  o PART I: ACTIVITIES OF THE JOINT FAO/IAEA DIVISION OF NUCLEAR TECHNIQUES IN FOOD AND AGRICULTURE RELEVANT TO CCPR WORK
  o PART II: UPDATE ON OECD ON RESIDUE CHEMISTRY AND PESTICIDE MINOR USES RELEVANT TO CCPR WORK

U.S. Position:
• At this time, the United States is still reviewing these materials and will develop a position if warranted.
Agenda Item 5(a)
Report on items of general consideration by the 2017 JMPR
Section 2 of the 2017 JMPR Report (English only)

Background:
- The document outlines the actions taken by the 2017 JMPR on Section 2: General Considerations.
  - 2.1 Special studies on microbiological effects of pesticide residues in foods
  - 2.2 Use of historical control data
  - 2.3 Further consideration of the process for establishing group MRLs: Update on the use of the revised commodity classification for vegetables
  - 2.4 Field use pattern anticipated residue comparison model
  - 2.5 Update of the International estimated short-term intake (IESTI) model used for the calculation of dietary intake: New large portion data

U.S. Position:
- At this time, the United States is still reviewing the 2017 JMPR Report and will develop a position if warranted.

Agenda Item 5(b)
CL 2018/11-PR
Report on 2017 JMPR responses to specific concerns raised by CCPR
Section 3 of the 2017 JMPR Report (English only)

Background:
- The document outlines the actions taken by 2017 JMPR on Section 3 of the 2017 JMPR Report (3. RESPONSES TO SPECIFIC ISSUES) which deals with specific issues brought up at JMPR, including any concern forms submitted during CCPR 49. At that Session, the United States submitted no concern forms. Section 3 is outlined below.
  - 3.1 CONCERNS RAISED BY THE CODEX COMMITTEE ON PESTICIDE RESIDUES (CCPR)
    - 3.1.1 Quinclorac (287)
  - 3.2 OTHER MATTERS OF INTEREST
    - 3.2.1 Abamectin (177)
    - 3.2.2 Acetamiprid (246)
    - 3.2.2.1 Update from the Joint FAO/WHO Expert Committee on Food Additives (JECFA)
    - 3.2.2.2 Harmonization of the dietary exposure methodologies for compounds used both as pesticides and veterinary drugs – Harmonizing/combining exposure from veterinary drug and pesticide use
    - 3.2.2.3 Pesticides for vector control – New Pesticide Active Ingredients Developed Initially for Vector Control: Use of JMPR WHO Core Assessment Group for Pesticides
    - 3.2.2.4 Other Matters of Interest: Update from the International Programme on Chemical Safety (IPCS)
    - 3.2.2.5 Harmonization of the residue definition – determining the level of interest in a pilot project to achieve more harmonized residue definitions

U.S. Position:
- As the 2017 JMPR report was just recently issued, the United States is still developing a position on this document if warranted.
Agenda Item 6
CX/PR 18/50/5
Draft and proposed draft maximum residue limits for pesticides in food and feed (at Steps 7 and 4) (English only)
CX/PR 18/50/5-Add.1
Comments at steps 6 and 3 (in reply to CL 2018/11-PR)

Background:
• The annual Joint FAO/WHO Meeting on Pesticide Residues (JMPR) was held in Geneva, Switzerland, from 12 to 21 September 2017.
• The Meeting evaluated 39 pesticides, including nine new compounds and five compounds that were re-evaluated for toxicity or residues, or both, within the periodic review program.
• The Meeting established ADIs and ARfDs, estimated maximum residue levels and recommended them for use by CCPR, and estimated supervised trials median residue (STMR) and highest residue (HR) levels as a basis for estimating dietary intakes.
• The Meeting also estimated the dietary intakes (both short term and long term) of the pesticides reviewed and, on this basis, performed a dietary risk assessment in relation to their ADIs or ARfDs. Cases in which ADIs or ARfDs may be exceeded were clearly indicated in order to facilitate the decision-making process by CCPR.
• The Meeting considered a number of general issues addressing current procedures for the risk assessment of chemicals, the evaluation of pesticide residues and the procedures used to recommend maximum residue levels.

U.S. Position:
• The United States has received comments recommending submission of four concern forms to the CCPR based on the 2017 JMPR reviews, including:
  o 2,4-D (Cotton)
  o Triflumezopyrim (All Commodities)
  o Picoxystrobin (Oilseed rap, seed)
  o Fenazaquin (Almonds)
• The United States is in the process of evaluating the comments to determine whether it would be appropriate to submit concern forms at this session of CCPR.

Agenda Item 7
Draft and proposed draft revision of the Classification of Food and Feed (CXM 4/1989)

Background:
• This is part of the ongoing effort to revise all of the crop groups in the Food and Animal Feeds Classification.
• The United States has co-chaired or chaired this workgroup from the start of this effort, has provided much of the documentation for the proposed crop groups, and strongly supports this project.
• The United States has provided below the specific background information for Agenda Items 7(a) – 7(f).
Agenda Item 7(a)
Type 04: Nuts, seeds and saps

- Draft Group 022: Tree nuts (at Step 7)
  - CX/PR 18/50/6
- Draft Group 024: Seeds for beverages and sweets (at Step 7)
  - CL 2018/12-PR, CX/PR 18/50/6 & Comments at Step 6 CX/PR 18/50/6-Add.1
- Proposed draft Group 025: Tree saps (at Step 4)
  - CL 2018/13-PR & CX/PR 18/50/6 & Comments at Step 3 CX/PR 18/50/6-Add.2

Note from Codex Secretariat:

Group 022 was finalized by CCPR43 (2011) and retained at Step 7 pending finalization of the remaining groups in Type 04. CX/PR 18/50/6 provides the revised groups as agreed by CCPR43. The Committee is invited to consider the conclusions and recommendations in relation to this Group.

Group 024 was considered by CCPR49 (2017) and forwarded to CAC40 (2017) for adoption at Step 5. The Commission adopted the Group at Step 5 and advanced it for comments at Step 6 and further consideration by CCPR50. Comments at Step 6 have been requested by means of CL 2018/12-PR. Key points of discussion, conclusions and recommendations are contained in CX/PR 18/50/6 and should be used to inform the comments provided in reply to the circular letter.

Group 025 was considered by CCPR49 and returned to Step 2 for redrafting. Comments at Step 3 have been requested by means of CL 2018/13-PR. Key points of discussion, conclusions and recommendations are contained in CX/PR 18/50/6 and should be used to inform the comments provided in reply to the circular letter.

Background:

- The Terms of Reference (TOR) for this work from the CCPR 2017 Report were: Continue work on two groups of Type 04 Nuts, Seeds and Saps: Group 024 Seeds for beverages and sweets and the new Group 025 Sap producing trees and determine if these groups can be expanded to other commodities.
- Following two rounds of comments in the electronic Working Group (eWG), the eWG came up with the following recommendations:
  - Group 024 - adding Senna seeds to this group.
  - Group 025 - (i) creating a new group for tree saps, and (ii) including this group in the renamed Type 04 “Nuts, Seeds and Saps.”
  - The name of Group 025 would therefore be amended to “Tree saps.”
  - Further work on both groups would relate to the inclusion of additional commodities only.

U.S. Position:

- We agree with the conclusions of the eWG, however we await receipt of any new comments in response to the two Circular Letters, in the event we need to provide further comments.
Comments in response to CL 2018/12-PR and CL 2018/13-PR are due to the U.S. Delegation as soon as possible, but no later than March 23, 2018. The US delegation will consider any comments received in preparing our responses to the Circular Letters due to the CCPR and Codex Secretariats by March 31, 2018.

Agenda Item 7(b)
CL 2018/20-PR & CX/PR 18/50/7
Type 05: Herbs and Spices
- Draft Group 027: Herbs (at Step 7)
- Draft Group 028: Spices (at Step 7)

Note from Codex Secretariat:
Group 027 Herbs and Group 028 Spices were finalized by CCPR43 and retained at Step 7 pending finalization of the revision of the Classification. CX/PR 18/50/7 provides the revised groups as agreed by CCPR43. The Committee is invited to consider the conclusions and recommendations in relation to these groups.

CCPR is expected to finalize all commodity groups related to Type 04 and Type 05 for adoption by CAC41 (2018) and inclusion in the Classification of Food and Feed. All groups under these types also addressed editorial amendments as agreed by CCPR49 including consistency of location of commodities and their codes within groups under Type 04 and Type 05 and with the table of examples of representative commodities for commodity groups for these types.

Background:
- The TOR for this work from the CCPR 2017 Report were to: consider new commodities for Type 05 Herbs and Spices.
- Additional herbs and spices developed within the eWG are highlighted in Appendix 1 of CL 2017/19-PR and coded as HH 3220 to HH 3274 for new Herb commodities and HS 3283 to HS 3350 for new Spice commodities.
- Based upon comments by Japan, Wasabi stem was included in Subgroup 027A (45th Session, REP3/PR, para 121), and code FC 2211 was included as Yuzu, with Yuja included as a synonym (44th Session, REP12/PR, para 101).
- Based upon comments by Germany, additional commodities were added to subgroups 027A, 028A, 028B, 028D and 028H. A third subgroup 027C Edible flowers was added. Caraway seed was moved from 028A to 028B.
- In response to comments by Canada, cross references were added for black, brown and white mustard seeds. Various corrections have been made in response to comments from the EU. The commodity kokam (FI 2487) was removed from earlier drafts because it is already a member of Subgroup 006B.
- The EU also proposed that Subgroups 028H (Citrus peel) and 028I (Dried chili pepper) would be more appropriate for Class D, Processed Foods of Plant Origin. Japan proposed that dried chili peppers should be included in 028B (Spices, fruit or berry) rather than in Subgroup 028I (Dried Chili Peppers).
- The eWG has requested comments on the above and on the appropriate location of milk thistle and perilla seed, which are also proposed for inclusion in the Oilseed group.
U.S. Position:
- We agree with the conclusions of the eWG, however we await receipt of any new comments in response to the Circular Letter, in the event we need to provide further comments.

Comments in response to CL 2018/20-PR are due to the U.S. Delegation as soon as possible, but no later than March 23, 2018. The US delegation will consider any comments received in preparing our responses to the Circular Letters due to the CCPR and Codex Secretariats by March 31, 2018.

Agenda Item 7(c)
CX/PR 18/50/8
Impact of the revised commodity groups and subgroups in Type 03, Type 04 and Type 05 on the Codex MRLs (CXLs) adopted by the Codex Alimentarius Commission

Background:
- The TOR for this work from the CCPR 2017 Report were to: consider how the adopted Codex Maximum Residue Limits (CXLs) in the existing database of Codex would be impacted by the revised commodity groups and subgroups in Type 03, 04 and 05.
- The Committee previously agreed that “no changes would be made to existing CXLs until such time as JMPR reviews were completed as per current procedures for the establishment of Codex schedules and priority list of pesticides.” The Committee agreed that the same approach would be taken when reviewing other commodity groups in the database following the adoption of revised commodity groups in the Classification” (REP/16-PR; Paragraph 119).
- To achieve this, the relocated commodity will keep its existing CXL, and will be excluded from the new group-CXL. The exclusion of the CXL from the new group-CXL will be done in the column “notes”.
- After evaluation by JMPR, it may be appropriate to implement the CXL of the new (sub)group and withdraw the CXL of the old group.
- The eWG is requesting comments on the description of proposed changes in Appendices I, II and III and on the recommendations provide comments on the procedures described in item 3 relative to the impact on CXLs in the database.

U.S. Position:
- We agree with the conclusions of the eWG.
Note from Codex Secretariat:
CCPR49 agreed to start with the revision of the commodity groups related to primary feed commodities. Comments at Step 3 have been requested by means of CL 2018/14-PR. Key points of discussion, conclusions and recommendations are contained in CX/PR 18/50/9 and should be used to inform the comments provided in reply to the circular letter.

Background:
- The TOR for this work from CCPR 2017 is to consider the revision of Class C, Primary Animal Feed Commodities. This Class includes Group 050, Legume Animal Feeds; Group 051, Straw, Fodder and Forage of Cereal Grains; and Group 052, Miscellaneous Fodder and Forage Crops.
- There was some support in the eWG to delete forage commodities since they are not traded internationally. However, it was pointed out that residues in forage commodities are used to calculate livestock dietary burdens with the use of STMR and HR values.
- The existing classification utilizes the term “fodder.” Fodder is a general term that includes hay, straw, silage and other plant products.
- The EU also proposed the creation of a Group in Class C that would include processed feed commodities of plant origin. Typical by-products of processing animal feeds include pomace, pulp, molasses, meal, cannery waste and other by-products.
- The eWG has requested comments on the following:
  - a number of additional commodities for Class C (Groups 050, 051 and 052),
  - the use of more specific commodity terms (hay, straw and silage) to replace the “fodder” terminology used previously, and
  - the EU proposal to create another group within Class C for processed animal feeds and by-products, or if these should be incorporated into the existing classification.

U.S. Position:
- The United States supports the replacement of the general descriptor "fodder" with more specific terms such as "hay", "straw", and "silage" to provide a better understanding and specificity of animal feed commodities in Class C, Type 11.

Comments in response to CL 2018/14-PR are due to the U.S. Delegation as soon as possible, but no later than March 23, 2018. The US delegation will consider any comments received in preparing our responses to the Circular Letters due to the CCPR and Codex Secretariats by March 31, 2018.
Note from Codex Secretariat:
CCPR49 agreed to continue with the development of tables on examples of representative commodities for commodity groups under Types 04, and 05. Comments at Step 3 have been requested by means of CL 2018/15-PR. Key points of discussion, conclusions and recommendations are contained in CX/PR 18/50/10 and should be used to inform the comments provided in reply to the circular letter.

The tables for representative commodities for commodity groups for Types 04, and 05 should be read in conjunction with the classification of commodity groups for these types as the classification and the selection of representative commodities for the extrapolation of MRLs are closely interrelated and are key for the establishment of Group MRLs.

Background:
- TOR 2 for this work from the CCPR 2017 Report: To review the consistency of the classification of Type 4 Nuts, Seeds and Saps and their codes and their location in table 4.
- The Committee has previously agreed that as a matter of principle, the introduction of a subgroup covering other commodities should be considered when necessary, to allow the inclusion of commodities, which were not easily placed under relevant specific subgroups in each group (CAC 2009).
- Because of the diversity of commodities in Subgroup 023D Other Oilseeds, it was not possible to establish representative commodities for this subgroup.
- Coconut (Group 22) was also proposed to be excluded as a representative crop, because its morphology and size is significantly different from other nuts.
- However, another task given to the eWG was to develop a system within the Classification to provide codes for commodities that do not meet the criteria for crop grouping (see Agenda Item 7(f)).
- In addition, the eWG was charged with reviewing the consistency of Type 05 Herbs and Spices, their codes, and location in Table 5.
- Based on comments by Japan, Wasabi stem was included in Subgroup 027A (45th Session, May 2013, REP13/PR, para 121), and code FC 2211 was included as Yuzu, with Yuja included as a synonym (44th Session, May 2012, REP12/PR, para 101). Other inconsistencies and typographical errors noted by the eWG were corrected.
- Based on comments by Germany, representative commodities for subgroup 027A are listed as “Basil and Mint or Leaf lettuce or Spinach”. Representative commodities for Subgroup 027B are listed as “Any commodity in this subgroup or Leaf Lettuce or Spinach”. Representative commodities for Subgroup 027C are listed as “Any commodity in this subgroup or Leaf Lettuce or Spinach”.
- CropLife International proposed additional representative commodities including: “Basil or Mint or Leaf lettuce or Spinach” for Subgroup 027A; “Any commodity in this subgroup or Oilseed representative commodities” for Subgroup 028A; “Any commodity in this subgroup or
representative crops from subgroup Small fruits and berries: for Subgroup 028B; “Any commodity in this subgroup or representative crops from Stalk and stem vegetables” for Subgroup 028C; “Any commodity in this subgroup or broccoli / cauliflower” for Subgroup 028E; “Saffron or representative crops from Flowerhead Brassica” for Subgroup 028F; “Mace or representative commodities from Tree nuts” for Subgroup 028G and “Any commodity in this subgroup or Citrus representative crops” for Subgroup 028H.

- The EU also proposed that the representative commodities for Subgroup 027A should be “Basil or Mint, or Leaf Lettuce or Spinach” and that the representative commodities for Subgroup 028D should be expressed as “Any commodity in this subgroup or any commodity in the Root and tuber vegetable group, applying an appropriate concentration factor”.

- Mint was included as a proposed representative commodity for 027A to provide representative residue data for oil from these commodities.

- The eWG recommends the Committee to forward the revised Type 04 – Nuts, seeds and saps (Agenda Item 7a) and the revised Type 05 Herbs and spices (Agenda Item 7b) and the corresponding Table 4 – Examples on the selection of representative commodities for Type 04 and Table 5 – Examples on the selection of representative commodities for Type 05 (Agenda Item 7e) to CAC41 (2018) for final adoption.

- The eWG has requested comments on the following:
  - Table 4;
  - The establishment of proposed Group 023D (Other Oilseeds), or if these commodities would be more appropriately placed in a miscellaneous group (Agenda Item 7(f));
  - a number of additional herb and spice commodities, their location in Table 5, and the proposed representative commodities; and
  - whether the proposal to include the additional representative commodities as presented above by CropLife International and the EU.

**U.S. Position:**

- The United States supports removing commodities from subgroup 023D (Other Oilseeds) and including the commodities in this subgroup in a separate type within the Class, which will provide a list of miscellaneous commodities that do not meet the criteria for crop grouping (see agenda item 7(f)). Commodities that have been previously placed in “Other” subgroups do not meet the criteria for crop grouping and do not have representative commodities.

*Comments in response to CL 2018/15-PR are due to the U.S. Delegation as soon as possible, but no later than March 23, 2018. The US delegation will consider any comments received in preparing our responses to the Circular Letters due to the CCPR and Codex Secretariats by March 31, 2018.*
Background:

- One of the seven eWG TOR from CCPR 2017 was to develop a system within the Classification to: provide codes for commodities that do not meet the criteria for crop grouping.
- Examples of these types of commodities include water chestnut (Trapa natans), foxnut (Euryale ferox) and lotus seed (Nelumbo nucifera); other examples include oilseed commodities that were previously included in Subgroup 023D, Other oilseeds.
- Two options were discussed by the eWG:
  - Option 1 would create a separate Type within each Class to provide a list of commodities and codes that do not meet the criteria for inclusion in a crop group.
  - Option 2 was to create “Other” subgroups within a crop group (CCPR41, 2009).
- Option 1 was preferred by the eWG, although Canada indicated that it supports the use of both options for the classification system for commodities that do not meet the criteria for crop grouping. While Canada expressed support for the use of both options, it also indicated that it would not be opposed to option 1.
- The eWG has requested comments on the two options considered by the eWG cited above.

U.S. Position:

- The United States supports Option 1 to create a separate type within each Class to provide a list of commodities and codes that do not meet the criteria for crop grouping.
- If a commodity does not meet the criteria for crop grouping, then it should be omitted from the representative commodity table. However, this system (Option 1) will still provide codes for the miscellaneous commodities.

Comments in response to CL 2018/21-PR are due to the U.S. Delegation as soon as possible, but no later than March 23, 2018. The US delegation will consider any comments received in preparing our responses to the Circular Letters due to the CCPR and Codex Secretariats by March 31, 2018.
Background:

- At the 2016 CCPR, the EU and Australia developed a conference room document (CRD03) proposing new work to explore possible revision to the IESTI equations and the impacts thereof.
- At the 2017 CCPR, the Committee agreed to establish an eWG, chaired by the Netherlands and co-chaired by Australia and Uganda, in order to identify advantages and challenges that might arise from the possible revision of the current IESTI equations and the impact on risk management, risk communication, consumer protection goals, and trade.
- The terms of reference (ToR) of the eWG were:
  i. To provide information on the history, background and use of the IESTI equations.
  ii. To review and provide illustrative comments on advantages and challenges that arise from the current IESTI equations and their impact on risk management, risk communication, consumer protection goals and trade.
  iii. To gather relevant information on bulking and blending, as well as other information or data as outlined in Table 3 Appendix 2 of CX/PR 17/49/12 in order to feed into the risk assessors work through the JMPR Secretariat.
  iv. On the basis of the above considerations, develop a discussion paper providing recommendations for consideration at CCPR 50.
- The United States actively participated in the IESTI eWG and provided comments on ToR i, ii, and iii in December 2017 and comments on ToR iv in January 2018.
- The eWG did not fully complete work for ToR ii and iii.
- It is anticipated that there will be further discussion at CCPR50 and that the eWG will be re-established to: (1) continue work the current eWG ToR ii and iii; (2) interact with the proposed FAO/WHO technical working group through the JMPR secretariat; and (3) prepare for discussions at the Committee’s next session that take into account the review of the IESTI at JMPR 2018.
- An FAO/WHO electronic technical working group has been established that will focus on establishing baseline information on modeling approaches that can be used to benchmark the IESTI model and proposed alternatives.

U.S. Position:

- The United States continues to strongly support a deep and thorough look at the component inputs of the IESTI equations -- both current and proposed -- that focuses on better and more fully characterizing the degree of protection afforded by the equations and whether change is ultimately needed.
- In support of this effort, the United States agrees with the re-establishment of the eWG and will participate in the FAO/WHO technical working group, that will help establish baseline information on modeling approaches that can be used to benchmark the IESTI model and proposed alternatives.
- The United States recognizes the importance of Codex MRLs in facilitating access to crop protection tools and supporting global food trade. Therefore, we are also eager to fully explore the potential impacts that changes to the IESTI equations may have on the number of MRLs that can be established, as well as impacts on risk management and risk communication.
- With respect to future work on IESTI, the United States believes any proposals for changes to the IESTI equations need considerable care and deliberation, and that consideration will likely take an
extended period of time and involve considerable resources as well as input from a variety of stakeholders and across a variety of viewpoints.

- The United States further believes that this deliberation on IESTI should emphasize issues that impact risk assessment and consumer health protection, rather than potential challenges in risk communication.

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**Agenda Item 9**

**CX/PR 18/50/13**

**Establishment of Codex Schedules and Priority Lists of Pesticides**

*(Based on comments submitted in reply to CL 2018/16-PR)*

**Note from the Codex Secretariat**

*The elaboration of the Priority List corresponds to Step 1 of the Codex MRLs Elaboration Procedure. The Committee will consider a document prepared by the Chair of the Working Group on Priorities (presented as a conference room document) based on CX/PR 18/50/13, which contains collated proposals for priority lists of pesticides based on comments submitted in reply to CL 2018/16-PR.*

**Background:**

- At the 2017 CCPR, it was agreed that an eWG would be reconvened to obtain nominations for the Codex schedule and priority list of pesticides for JMPR for the years 2019 – 2021 and beyond. In order to facilitate submission of nomination information, the eWG established an electronic forum on the Codex IT Platform at: [http://forum.codex-alimentarius.net](http://forum.codex-alimentarius.net).
- The United States coordinated the nomination process with U.S. stakeholders and submitted nominations in November 2017.
- After receiving nominations from the United States and other member countries, the eWG issued Circular Letter CL 2018/16-PR requesting feedback on the updated Codex schedules and priority lists of pesticides.

**U.S. Position:**

- The United States has reviewed the Codex Schedules and Priority Lists of Pesticides provided in Circular Letter CL 2018/16-PR. The schedules and priority lists are consistent with United States’ nominations that were submitted to the eWG in November 2017.
- As such, the United States did not submit formal comments in response to the Circular Letter and has verified that the Codex Schedules and Priority Lists reflects nominations submitted by the United States in 2017.
Agenda Item 10
CX/PR 18/50/14
Information on national registrations of pesticides
(Based on information submitted in reply to CL 2018/17-PR)

Note from the Codex Secretariat
The Committee will consider document CX/PR 18/50/14 prepared by Australia and Germany in reply to CL 2018/17-PR following information submitted by Codex members on their registration of pesticides. This document should be read in conjunction Agenda Item 9 to aid discussion on the establishment of Codex priority lists of pesticides.

Background:
- Following CCPR 2016, a circular letter was issued requesting information from Member countries regarding national registrations for all compounds on the CCPR Pesticide List.
- For each compound, the circular letter further requested Member countries to list commodities for which a registered use has been established.
- The information obtained in response to this circular letter was discussed at CCPR 2017 and the Committee determined that further clarification was needed.
- Following CCPR 2017, Circular Letter CL 2018/17-PR was issued to obtain information on national registrations using a new template. The CL also requested feedback on the submission process and the format of the complete database of national registration information for Member countries.

U.S. Position:
- The United States supports efforts to improve access to information on national registrations of pesticides. Development of this information will require close coordination by Member countries and consideration of how to structure data collection to standardize submission.
- The United States supports further discussion at CCPR 50 on how to efficiently collect and report standardized information on national registrations of pesticides.

Agenda Item 11
Other Business and Future Work

U.S. Position:
- No new documents have been provided at the time of this public meeting, so there is nothing to comment on under this agenda item at this time.

Agenda Item 12
Date and Place of the Next Session

U.S. Position:
- No US position needed in advance.

Agenda Item 13
Adoption of the Report

U.S. Position:
- No US position needed in advance.