Stakeholder meeting
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Revisiting the International Estimate of Short-Term Intake (IESTI): Considerations of the European Commission

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Health and Food Safety

Scope

- DG SANTE responsible for legislation on pesticide residues
- Working with Member States in Standing Committee on Plants, Animals, Food and Feed
- Presentation not coordinated with Member States

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Current situation

- Experience with current IESTI equations
- MRL setting
- Enforcement decisions
- Possible improvements?

Points to revisit

- Variable for the contribution of the residue level
- Value in equation is lower than the MRL in all cases (1, 2a, 2b, 3)
- Logical, as MRL should cover all residue levels expected following good agricultural practice

Points to revisit

- In reality, some residue levels between HR and MRL
- Are those levels safe?
- Current dietary risk assessment only up to HR
- Communication: MRLs are sufficiently protective for consumers

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Points to revisit

- Question arises frequently when
  (1) IESTI(HR) > 50% of ARfD, and
  (2) detection below but near MRL
- Example
- Concerns of trade/retail, problem for enforcement authorities, difficult risk communication

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Points to revisit

- Good reason to choose HR over MRL from scientific point of view
- But difficult for risk communication in certain situations
- Requirement: All residue levels entered up to and including the MRL should not result in ARfD exceedance

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MRL setting vs. enforcement

- Different equations for MRL setting and for enforcement purposes?
- SANTE view: not ideal, given the considerations on risk communication
- Strongly prefer same equations for MRL setting and enforcement

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International aspects

- MRLs: key tool for consumer protection
- Also important standards for (international) trade
- Reduction of differences between EU-MRLs and standards in third countries desirable

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International aspects

- Systematic implementation of Codex MRLs in the EU
- Import tolerances
- Food classification

International aspects

- Not productive in this context to increase the divergence in MRL setting procedures at EU level versus international level

- Requirement: Revised IESTI equations should be acceptable at international level, notably Codex/JMPR

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Level of Protection (LoP)

- Pesticides and their residues are seen very critically by public
- Reduction of overall LoP is not desirable, and would be difficult to defend
- Requirement: Overall LoP should not be lowered

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Level of Protection

- Large overall increase in LoP may lead to loss of many MRLs
- One option discussed: additional information may allow to reconsider variability factors used in EU for different crops
- Two advantages:
  - Alignment to international practice
  - With HR=>MRL in IESTI equations, preliminary impact assessment indicates overall similar LoP

Level of Protection

- For JMPR, it would mean only replacing HR with MRL, as variability factors at Codex level already used in the way as proposed

- Overall increase of LoP at Codex => some Codex MRLs would be lost (no longer considered safe when assessed with revised IESTI equation)

More points to revisit

- More differences in implementation exist between JMPR and national/regional authorities
- Further ideas to simplify IESTI equations and to take out variables introducing high uncertainties
- More opportunities for alignment
- Address in workshop what is possible, but…

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More points to revisit

- Consider acceptance at international level and practical implementation => crucial
- Some level of difference may be unavoidable, e.g. diets, unit sizes

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Summary of key requirements

- All residue levels entered up to and including the MRL should not result in ARfD exceedance
- Revised IESTI equation should be acceptable at international level, notably Codex/JMPR
- Overall LoP should not be lowered

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Thank you

Health and Consumers