



18 October 2019

(19-6828)

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Committee on Sanitary and Phytosanitary Measures

Original: Spanish

**SPECIFIC TRADE CONCERNS – EUROPEAN UNION MRLS FOR BUPROFEZIN,
DIFLUBENZURON, CHLOROTHALONIL, ETHOXYLSULFURON, GLUFOSINATE,
IMAZALIL, IOXYNIL, IPRODIONE, MOLINATE, PICOXYSTROBIN
AND TEPRALOXYDIM (NO. 448)**

COMMUNICATION FROM COLOMBIA, COSTA RICA, CÔTE D'IVOIRE,
ECUADOR, GUATEMALA, PANAMA AND PARAGUAY

The following communication, dated 16 October 2019, is being circulated at the request of the delegation of Colombia, Costa Rica, Côte d'Ivoire, Ecuador, Guatemala, Panama and Paraguay.

Colombia, Costa Rica, Côte d'Ivoire, Ecuador, Guatemala, Panama and Paraguay would like to ask the European Union the following questions related to specific trade concern No. 448 and MRL amendments.

EUROPEAN UNION AMENDMENTS OF MRLS FOR IMAZALIL (G/SPS/N/EU/319)

1. What is the scientific justification for establishing an MRL of 0.01 mg/kg for imazalil in bananas and departing from the relevant international standard (Codex Alimentarius), which sets an MRL of 2.0 mg/kg?
 2. Is the MRL of 0.01 mg/kg based on scientific principles? In particular, is it based on an assessment, as appropriate to the circumstances, of the risks to human life or health, taking into account risk assessment techniques developed by the relevant international organizations?
 3. Could you share how, in the assessment of risks, the following were taken into account: available scientific evidence; relevant processes and production methods; relevant inspection, sampling and testing methods; prevalence of specific diseases or pests; existence of pest- or disease-free areas; relevant ecological and environmental conditions; and quarantine or other treatment?
 4. Could you share how, in assessing the risk and determining the measure to be applied for achieving the appropriate level of protection from such risk, the following were taken into account as relevant economic factors: the potential damage in terms of loss of production or sales in the event of the entry, establishment or spread of a pest or disease; the costs of control or eradication in the territory of the importing Member; and the relative cost-effectiveness of alternative approaches to limiting risks?
 5. How was the objective of minimizing the negative effects on trade taken into account when determining that the MRL for imazalil in bananas should be reduced from 2.0 to 0.01 mg/kg, which in practice implies prohibiting imports of bananas for which this substance has been used?
 6. How is reducing the MRL for imazalil in bananas to 0.01 mg/kg justified when the MRLs for other products posing a similar risk are maintained or reduced slightly?
 7. If it is considered that there is insufficient relevant scientific evidence demonstrating the safety of the MRL set out by the Codex Alimentarius, why was the measure not notified as provisional while the EU seeks to obtain the additional information necessary for a more objective assessment of risk and reviews the MRL accordingly within a reasonable period of time?
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