European review of Chlorpropham and UK impact- Potato storage

Chlorpropham (CIPC) has been undergoing a routine review in Europe since 2015 and it has been discussed at successive SCoPAFF (Standing Committee on Plants, Animals, Food and Feed) meetings and the Appeal Committee, and no opinion was reached. In this event the decision rests with the European Commission and they have concluded that CIPC cannot be renewed.

Consequences of non-renewal of the authorisation for CIPC

The implementing regulation (EU 2019/989 of 17th June) for non-renewal was published in the Official Journal (OJ) on 18th June 2019 and comes into force 20 days after publication. The withdrawal period stated within the regulation is 8 January 2020 for all member states to withdraw authorisations of products containing CIPC, and the maximum grace period for use, storage and disposal shall expire 8 October 2020 at the latest.

UK CRD will need to decide on suitable withdrawal periods and will shortly issue withdrawal notices on the HSE website http://www.hse.gov.uk/pesticides/news/
The Task Force (TF) expects that the end date for storage, disposal and use will closely follow the EU position but these are not confirmed until publication by CRD.
It will be illegal to use CIPC in the UK beyond these end dates and growers/store managers are advised to check with their supply chain partners/customers prior to treating crop with CIPC. The maximum residue limit (MRL) of 10ppm is expected to be in place for the 2019/2020 potato storage season.

However, because the active substance is not renewed the MRL could fall to near zero (limit of quantification- LoQ) within 2 years, and the import of potato products into Europe with residues of CIPC above this level will not be permitted.

An application for a temporary MRL above the limit of quantification (LoQ) to cover previous store contamination is being sought by Certis and UPL to prevent the MRL falling to LoQ in the short term. This limit will be temporary and will differentiate between contamination and illegal use.

Why has this decision been reached by the European Commission?

Although this decision did not achieve universal acceptance in Europe amongst its Member States, the European Commission, based on the advice of EFSA (European Food Safety Authority), considered that there could be a risk to consumers. In the absence of data, assumptions have been made on inputs into the consumer risk assessment. The consumer risk model has inputs for the variability factor (vF) and the processing factor (pF). The UK previously used a reduced vF supported by new data submitted to CRD in July 2017 by the TF, but it was not possible to submit these data into the EU review. EFSA used the higher default vF. Moreover, it has not been possible to take into account the ways potatoes are consumed and EFSA used a pF of 1 in the risk modelling, effectively assuming that tubers are eaten unwashed and raw. This results in a calculated exceedance of the Acute Reference Dose (ARfD). Audax are taking these data into consideration in their risk assessments.

Disappointing outcome

It is disappointing that a dossier considered complete at the start of the review was found lacking in the closing stages, without an opportunity to submit further data. Any further consideration of CIPC in Europe would be as a new active substance.

Glossary

The ARfD (Acute Reference Dose) to define (on the basis of all known facts at the time of the evaluation) an estimate of a chemical substance in food (or drinking water), expressed on a bodyweight basis, that can be ingested over a short period of time, usually during one meal or one day, without appreciable health risk to the consumer . Acute exposure

- intake over a single meal or day
- takes account of peaks when large consumption of single food
- no averaging

Variability factor vF a factor which takes into account the unit to unit variability of a pesticide residue.

Processing factor pF used to take into account residue decreases or increases on processing steps e.g. washing/peeling/cooking methods.