

Memorandum

TO : Mr. L.M. Beacham, Director (BF-110)
Div. of Food Chemistry & Technology/OFNS/BFP/FDA

THRU : Dr. Henry Fischbach, Director (BF-200)
Office of Pesticides/BFP/FDA

FROM : Dr. O. G. Fitzhugh (BF-203)
Office of Pesticides/BFP/FDA

DATE: July 23, 1970

SUBJECT: Recommended International Tolerances for Pesticide Residue
(Mr. Cummings Memo of 7/9)

1. HYDROGEN CYANIDE

Proposed international tolerances: 75 ppm on raw cereals and 6 ppm on flour.

Although these tolerances apply to all "raw cereals" the principal consideration was to wheat and wheat flour. In explanation of Mr. Cummings' comment on the contrast of the U.S. tolerance of 125 ppm in flour and the proposed international tolerance of 6 ppm, the fumigating of flour in the holds of ships was not under consideration by the Codex. The 6 ppm was established to allow for HCN in flour from the treated grain. Some values were given in Alinorm 66/24 May 1966 for treated wheat and the resulting amount of HCN in the flour.

I have discussed the discrepancies with representatives of the American Cyanamid Co. on several occasions. They have agreed in each instance that there was no problem with the proposed international tolerances for hydrogen cyanide.

Previously in discussing the difference in our tolerance of 100 ppm vs 75 ppm for international tolerance with Mr. Kirk, he had suggested that we should propose a lowering of our tolerance to 75 ppm for raw cereals.

The question of fumigating flour directly was not considered by the Codex and this probably would require aeration before acceptance in foreign ports under a 6 ppm tolerance. At this time we are not considering the direct treatment of flour:

2. INORGANIC BROMIDE

International tolerance: 50 ppm on raw cereals.

Popcorn is not included in the definition of "raw cereals" (CCPR/69/8/1 August 1969); therefore, the tolerance does not apply to popcorn.



The question of the complete degradation of organic to inorganic bromide has not been solved and was referred again to the Joint Meeting last year (Alinorm 70/24 December 1969). It applies particularly to fruit as is mentioned in 120.146 and will be considered at a later date.

3. MALATHION

International tolerance: 8 ppm on raw cereals.

There is no conflict in the international tolerance and the U.S. tolerance. The Codex definition of "raw cereals" includes those grains listed under U.S. tolerances as the principal seed grains used as staple foods.

SUMMARY

At each step in consideration of the three proposed international tolerances we have commented and agreed that the United States could accept them. As stated above, I have shown that the two discrepancies noted by Mr. Cummings do not apply. The only requirement is an acceptance of the 75 ppm figure for HCN. From discussions with the regulated industry, this appears to be no problem.

I suggest that we accept these standards in full.

cc: BF-200
BF-110
BF-203

OGFitzhugh:pac 7-23-70