CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



Agenda Items 6, 7d, 9, 15

CRD10 July 2021 ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

52nd Session (Virtual) 26-30 July and 3 August 2021

Comments submitted by Thailand

Agenda Item 6

Specific Comments

Clethodim (187)

Following the four-year rule, members/observers may provide a commitment to the JMPR to provide the necessary data within four years.

Thailand is of the opinion that these existing MRLs have been established from the previous residue definition which is still safe. So, we would like to request maintaining the existing CXLs of clethodim for four years. Member/observers have opportunity to submit data related to toxicology and supervised residue trial for JMPR review.

Dimethoate (027)

Thailand would like to suggest that the existing CXLs of dimethoate should be maintained because JMPR meeting concluded that dimethoate was unlikely to pose a carcinogenic risk to humans. Moreover, the meeting was unable to complete the assessment of omethoate with respect to the determination whether or not there is mutagenic potential. Therefore, If the result of risk assessment for dimethoate is safe, CXLs for dimethoate should be maintained.

Acetamiprid (246)

Thailand supports the recommended MRLs for subgroup of spices, seed.

Carbendazim (072)

Thailand supports the recommended MRLs for subgroup of spices, seed.

Agenda Item 7d

Specific Comments

Thailand would like to propose the definition of hay, straw and stover should be clearly defined, in order to appropriately establish MRL for each commodity.

In addition, MRLs of hay and straw should be expressed as dry weight basis or as received.

Thailand agrees with Japan's investigation that existing MRLs of fenarimol, fenbuconazole, fludioxonil, flusilazole, imidacloprid, methoxyfenozide, novaluron, pyrimethanil and spirodiclofen for apple pomace shall be reinstated in the Codex database while those for the respective pesticides in sweet corn fodder shall be removed from the database as they were not adopted by the Commission.

Agenda Item 9

General comments

Thailand supports the re-establishment of the EWG to continue working on TORs(i)-(ii). We are of the view that CXG 90-2017 has already covered mass spectrometry. If more information from CXG 56-2005 is needed to add to the CXG 90-2017 for completeness, the CXG90-2017 should then be revised and CXG 56-2005 can later be revoked.

Agenda Item 15

Thailand would like to thank Australia and members of electronic working group for the excellent work done. We generally agree with Codex Schedules and Priority list. However, we would like to propose the addition of one

commodity to the existing priority and one substance and commodity combination in Table 1 - 2022 new use - other worksheet as follows:

1. In priority number 8 Emamectin (247), we would like to add VL 0401 Broccoli, Chinese (6 trials) as follows:

A B C D E F G H I J 6 11/28/2019 NA Tetraniliprole (999) Yes Yes RICE (foliar) Rice (12) Bayer AG requested for 2022 JMPR revie 7 11/29/2019 Propiconazole (160) Propiconazole (160) Yes Yes AVOCADO (FI 0326); Subgroup of Wheat, Similar- Grains and Pseudocereals- without Husks (GC 2086);- Subgroup of Sorghum Grain- and Millet (GC 2089); Avocado (6), wheat, sorghum,- maize, blueberries, caneberries, caneberries, subgroup of Sorghum Grain- and Millet (GC 2089); Syngenta Advice 29092020 on label for peanuts, avocado 7 11/29/2019 Propiconazole (160) Yes Yes Avocado (FI 0326); Subgroup of Sorghum Grain- and Millet (GC 2089); Subgroup of Sorghum Grain- and Millet (GC 2089); Subgroup of Buch. Berries (FB 2006); Subgroup of Dry Beas. (VD- 2056); Subgroup of Dry Beas. (VD- 2056)	3	- : X	√ f _× A	dvice 29092020 on la	hel for bras	sica leafy ver	zetables			
6 11/28/2019 NA Tetraniliprole (999) Yes Yes RiCE (foliar) Rice (12) Bayer AG requested for 2022 JMPR review 7 11/29/2019 Propiconazole (160 Propiconazole (160) Yes Yes AVOCADO (FI 0326); Subgroup of Wheat, Similar- Grain- and Pueudocereal- without Huck (GC 2036); Subgroup of Maite (GC 2036); Subgroup of Maite (GC 2039); Subgroup of Maite (GC 2039); Subgroup of Maite (GC 2039); Subgroup of Maite (GC 2039); Subgroup of Dry-Beans (VD- 2056); Subgroup of Low- Berries (FB 2006); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry-Beans (VD- 2056); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry Beans (VD- 2056); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry Beans (VD- 2056); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry Beans (VD- 2056); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry Beans (VD- 2056); Subgroup of Dry Beans (VD- 2056); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry Beans (VD- 2056); Subgroup of Low- Bearries (FB 2006); Subgroup of Dry Beans (VD- 2056); Subgroup of Dry Beans (VD- 2057); SUBGROUP OF HERBS (HB 2095); SUBGROUP OF FLOWERHALD MARSACKA (VB 2004); Cabbage, head, celerry- distries, chires (6), spinach (6), Coffree label should be approved by Dce 2221 and Soybean by April 2021. Advice on 26022021 tea dasification.							-			
8 11/29/2019 Emamectin (247) Yes Yes Yes Subgroup of Wheat, Similar, Grain, and Alleted, Gc. 2089); Subgroup of Bush, Berrier, (F2 2006); Subgroup of Bush, Berrier, (F2 2006); Subgroup of Bush, Berrier, (F2 2006); Subgroup of Alaite Careale. (GG 2019); Subgroup of Alaite Careale. (GG 2019); Subgroup of Bush, Berrier, (F2 2006); Subgroup of Alaite Careale. (GG 2019); Subgroup of Bush, Berrier, (F2 2006); Subgroup of Dry Beans, (VD 2066); Subgroup of Dry Peans,		-	-				-			requested for 2022 JMPR revie
Subgroup of Wheat, Similar Grains and Millet (GC 2008); Subgroup of Sorghum Grain and Millet (GC 2008); Subgroup of Sorghum Grain and Millet (GC 2008); Subgroup of Bush Berrier (FB 2006); Subgroup- 4A Cane Berries (FB 2005); PENNUT, SHELLD (GROUNDWUT) (Sto 0597); Subgroup of Dry Beans (VD 2005); Subgroup of Dry Peans (VD 2005); Subgroup of Dry Pean										
8 11/29/2019 Emamectin (247) Yes Yes SUBGROUP OF HERBS (HH Basil (4), broccoli & cauliflower Syngenta Advice 2909202 on label for 2095); SUBGROUP OF (13), abbage, head, celery, Control <t< td=""><td>7</td><td>11/29/2019</td><td>Propiconazole (160)</td><td>Propiconazole (160)</td><td>Yes</td><td>Yes</td><td>Subgroup of Wheat, Similar- Grains and Pseudocereals- without Husks (GC 2086); Subgroup of Sorghum Grain- and Millet (GC 2089); Subgroup of Maize Cereals (GC 2019); Subgroup of Bush- Berries (F8 2006); Subgroup of Bush- Berries (F8 2006); Subgroup of Dry Peas (GROUNDNUT) (SO 0697); Subgroup of Dry Peas (VD 2066); Subgroup of Dry Peas (VD 2066); Subgroup of Low.</td><td>maize, blueberries, caneberries, blackberies, peanuts (12), dry-</td><td>Syngenta</td><td></td></t<>	7	11/29/2019	Propiconazole (160)	Propiconazole (160)	Yes	Yes	Subgroup of Wheat, Similar- Grains and Pseudocereals- without Husks (GC 2086); Subgroup of Sorghum Grain- and Millet (GC 2089); Subgroup of Maize Cereals (GC 2019); Subgroup of Bush- Berries (F8 2006); Subgroup of Bush- Berries (F8 2006); Subgroup of Dry Peas (GROUNDNUT) (SO 0697); Subgroup of Dry Peas (VD 2066); Subgroup of Dry Peas (VD 2066); Subgroup of Low.	maize, blueberries, caneberries, blackberies, peanuts (12), dry-	Syngenta	
	8	11/29/2019	Emamectin (247)	Emamectin (247)	Yes	Yes	SUBGROUP OF HERBS (HH 2095); SUBGROUP OF FLOWERHEAD BRASSICAS (VB 0042); cabbage, head (VB 0042); cabbage, head (VB 0041); CHIVES (VA 4155); SPINACH (VL0506), TEA (DT1114), COffee beans (SB 0716), Soya bean (dry) (VD 0541), VL 0401 Broccoli,	(13), cabbage, head, celery, cherries, chives (6), spinach (6), turnips (6), tea (5), coffee beans (5), soybean (20) <u>Broccoli,</u>	Syngenta	brassica leafy vegetables Coffee label should be approved by Dec 2021 and Soybean by April 2021. Advice

2. Fosetyl-Aluminium in Rice, and its datasets will also be submitted for JMPR's evaluation in 2022. We realize that JMPR has just re-evaluated Fosetyl-Aluminium in 2019.

We apologize for late proposal. This is due to that fact that the definition of this substance was newly revised and adopted in 2017. Thus, we had to redesign the experiments, which led to failure to submit the dataset in 2019.