

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4.12**

**CX/CAC 23/46/14 Add. 1**  
**October 2023**  
**Original Language Only**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX ALIMENTARIUS COMMISSION**  
**Forty-sixth Session**

**COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED**  
**BY THE 54TH CODEX COMMITTEE ON PESTICIDE RESIDUES<sup>1</sup>**

**BACKGROUND**

1. This document compiles the comments on the draft standards submitted at Step 5/8 of the Procedure. The comments are as shown in Appendices I and II
2. OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

**EXPLANATORY NOTES ON APPENDICES I AND II**

3. The comments received are presented in a table format, with two columns as follows:
  - **First column** – Presents the comments with the rationale.
  - **Second column** – Presents the provider of the comments (name of member or observer)

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<sup>1</sup> This document compiles comments submitted through OCS, or via email by the time this document was issued, in reply to CL 2023/78/OCS-CAC and CL 2023/79/OCS-CAC

## Appendix I

**COMMENTS IN REPLY TO CL 2023/78/OCS-CAC - REQUEST FOR COMMENTS AT STEP 5/8 ON  
MAXIMUM RESIDUE LIMITS FOR PESTICIDES IN FOOD AND FEED**

*Comments of Canada, Chile, Costa Rica, Ecuador, Egypt, European Union, Guatemala, Indonesia,  
Paraguay, Peru, United Arab Emirates and CropLife International.*

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
Canada supports the adoption by CAC46 of the maximum residue limits for pesticides in food and feed (at Step 5/8), as recommended in the 2022 JMPR Report.	<b>Canada</b>
<p>Considerando que es relevante que el Codex avance en las recomendaciones de LMRs de aquellos principios activos que se usan regularmente, Chile apoya la adopción de todas las propuestas según se presentan en el Apéndice II del REP23/PR541.</p> <p>Considering that it is relevant for the Codex to progress in the recommendations of MRLs for those active ingredients that are regularly used, Chile supports the adoption of all the proposals as presented in Appendix II of REP23/PR541.</p>	<b>Chile</b>
Costa Rica supports adoption of MRLs at Step 5/8.	<b>Costa Rica</b>
Ecuador thanks the opportunity to comment in respond to the circular letter CL 2023/78/OCS-CAC regarding the request for comments on maximum residue limits for pesticides in food and feed at Step 5/8, as is referred on REP23/PR54, paragraph 176(i)(a) and appendix II. It is the opinion of Ecuador that the MRLs are ready for adoption.	<b>Ecuador</b>
Egypt appreciates the work done in MRLs and agrees on adoption of them & due to the lack of available toxicological data at the Egyptian level & according to EPA evaluation report 2022, Broflanilide is likely to be Carcinogenic in Humans, so that we propose to postpone the adoption of MRLs for Broflanilide (326).	<b>Egypt</b>
<p>The European Union (EU) would like to provide the following comments:</p> <p>Spiromesifen Paragraph 140 of the Report from the 54th CCPR Meeting mentions that eggplants are missing and should be incorporated based on an intervention of JMPR Secretariat. However, eggplants are neither included in Annex II of the CCPR Report nor are they part of the JMPR Report 2022 or the JMPR Evaluations 2022.</p> <p>In fact, an MRL of 0.7 mg/kg was adopted by CAC in 2017.</p>	<b>European Union</b>
the MRLs are ready for adoption.	<b>Guatemala</b>
Indonesia supports the adoption of Maximum Residue Limits for Pesticides (Appendix II, REP23/PR54) at Step 5/8 at the 46th Session of CAC.	<b>Indonesia</b>
Paraguay agradece el trabajo realizado por el CCPR y apoya la adopción de los LMR mencionados en el documento.	<b>Paraguay</b>
<p>El Perú a través de Comisión Técnica Nacional de Residuos de Plaguicidas, en respuesta de la a la carta circular remitida por la secretaria del Codex, ha brindado sus aportes, comentarios y sugerencias sobre los límites máximos de residuos de plaguicidas en alimentos y piensos a lo largo de los distintos trámites.</p> <p>Al respecto, el Perú no presenta observaciones, mostramos conformidad sobre los límites máximos de residuos de plaguicidas en alimentos y piensos que presenta dicha circular, a fin de que siga su curso.</p>	<b>Peru</b>
United Arab Emirates reviewed paragraph 176(i)(a) and Appendix II of REP23_PR54 and concluded that the MRLs are ready for adoption	<b>United Arab Emirates</b>

<p>CropLife International finds the MRLs proposed ready for adoption as they were advanced by CCPR54. CropLife International therefore recommends that the CAC adopts these MRLs at step 5/8. We would like to thank the JMPR, CCPR and CAC for the extensive work on the proposed MRLs.</p>	<p><b>CropLife International</b></p>
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## Appendix II

**COMMENTS IN REPLY TO CL 2023/79/OCS-CAC - REQUEST FOR COMMENTS AT STEP 5/8 ON THE REVISION OF THE CLASSIFICATION OF FOOD AND FEED (CXA 4 – 1989)**

*Comments of Canada, Chile, Costa Rica, Guatemala, Indonesia, Paraguay, Peru, Switzerland, United Arab Emirates and USA*

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
Canada supports the adoption by CAC46 of the revised Class B (Primary Food Commodities of Animal Origin) and Class E (Processed Foods of Animal Origin), the corresponding Tables 9 and 10, respectively, which provide examples of the selection of representative commodities for these two classes, and the accompanying text.	<b>Canada</b>
Como resultado de la 54ª reunión del Comité del Codex sobre Residuos de Plaguicidas, Chile apoya la adopción en la CAC46 de todos los temas sobre la revisión de la Clasificación de Alimentos y Piensos presentados en la CL 2023/79/OCS-CAC,  As a result of the 54th meeting of the Codex Committee on Pesticide Residues, Chile supports the adoption at CAC46 of all the topics regarding the Food and Feed Classification review presented in CL 2023/79/OCS-CAC.	<b>Chile</b>
Costa Rica supports the adoption of the proposed classes at Step 5/8.	<b>Costa Rica</b>
Class B and Class E are ready.	<b>Guatemala</b>
Indonesia supports the adoption of the revision of the Classification of Food and Feed (CXA 4-1989): Class B and Class E; and the potential consequent amendments to the Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Groups (CXG 84-2012): Table 9 and Table 10 at Step 5/8.	<b>Indonesia</b>
Paraguay expresa su preocupación por la falta de acceso al texto en español como uno de los idiomas empleados por el comité, en tiempo y forma, sin embargo Paraguay no se opone al avance del documento.	<b>Paraguay</b>
El Perú a través de Comisión Técnica Nacional de Residuos de Plaguicidas, en respuesta de la a la carta circular remitida por la secretaria del Codex, el Perú no presenta observaciones, mostramos conformidad sobre la revisión de la Clasificación de Alimentos y Piensos (CXA 4-1989), a fin de que continúe su curso.	<b>Peru</b>
Switzerland supports the adoption of the revised Class B and E and the examples of selection of representative commodities in table 9 and 10, respectively. However, as noted in the report of CCPR54 Switzerland does not welcome the inclusion of endangered species in Class B and E which could be interpreted as an attempt to facilitate trade of endangered species. This would contradict international provisions such as the CITES Agreement.	<b>Switzerland</b>
United Arab Emirates reviewed REP23/PR541, paragraph 209(i)(a) and Appendices VIII and IX and concluded that Class B and Class E and corresponding Tables 9 and 10 of representative commodities are ready for adoption	<b>United Arab Emirates</b>
The United States believes that Class B and Class E as well as the corresponding Tables 9 and 10 of representative commodities are ready for final adoption, however the United States would like to provide the following comment regarding Class B Primary food commodities of animal origin.  There appears to be an administrative error in In Appendix VIII of the final report of the 54th Session of the Codex Committee on Pesticide Residues (CCPR54) (REP23/PR54). Specifically on page 133 of the English version of REP23/PR54 there is the following error: Subgroup 043B Edible offal of fish is followed by Aquatic animal product Group 044 and includes crustacean commodities. Subgroup 043B Edible offal of fish should be followed by Marine	<b>USA</b>

Mammals Group 044 including Subgroup 044B Marine mammalian muscle and Subgroup 044B Fat of marine mammals. Group 044 should then be followed by Aquatic animal products, Group 045 Crustaceans.

This is supported by the groups, subgroups and commodities in Agenda item 7(a) (CX/PR 23/54/6) and the inclusion of Group 044 Marine mammalian products and Group 045 Crustaceans in Table 9 Examples of Representative Commodities for Class B.

The United States understands that corrected versions of Class B and Class E were recently submitted to the Codex Secretariat, therefore the United States supports final adoption of the corrected versions.