

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 6, 9, 10, 11, 12, 13, 15, 16, 17, 18

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ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

53rd Session

(Virtual)

4-8 July and 13 July 2022

(Comments of Thailand)

#### **Agenda Item 6: MRLs for pesticides in food and feed (at Steps 7 and 4) CX/PR 22/53/5**

Thailand does not objection MRLs for pesticides in food and feed in this agenda item.

##### **Metalaxyl (138)**

Thailand would like to ask for a clarification from JMPR about our supervised residue trials for metalaxyl in pineapple (5 trials) submitted on 10 January 2018. Whether the data was enough for evaluation or not as we could not find the data of metalaxyl in pineapple in the report of JMPR for 2021.

Furthermore, MRLs of metalaxyl in citrus groups will be recommended to withdraw by JMPR, so we would like to submit the supervised residue trials for metalaxyl in pomelo (4 trials).

#### **Agenda Item 9: Guidelines for compounds of low public health concern that may be exempted from the establishment of Codex MRLs or do not give rise to residues (at Step 7) CX/PR 22/53/11**

In general, Thailand has no objection to the revised guidelines.

#### **Agenda Item 10: Engagement of JMPR in parallel reviews of new compounds - Criteria for selecting the global project manager for the parallel review process. CX/PR 22/53/12**

Thailand does not oppose to criteria for selecting the global project manager for the parallel review process.

#### **Agenda Item 11: Management of unsupported compounds without public health concern scheduled for periodic review CX/PR 22/53/13**

Thailand has no objection to the proposal in Appendix 1. In addition, many unsupported compounds without public health concern have been used and registered in several agriculture producing countries. In principle, we are of the view that the establishment of MRLs should cover the combination of registered or authorized pesticides and commodities as much as possible. This is important tool in providing MRL reference values to facilitate trade and also reduce the existing gap between developed and developing countries.

Therefore, it would be better to clearly address the retention of the CXLs of those compounds which are registered in a country for promoting data collection via the national registration database (NRD). The NRD will provide updated information for the JMPR re-evaluation, to simplify the procedure for the periodic review. This procedure is adverse effect on international trade as well as consumers' health. Besides, we prefer JMPR to review the updated information of "GAP" and propose new recommended CXLs rather than deletion of the CXLs of the compounds without public health concern.

#### **Agenda Item 12: National registrations of pesticides CX/PR 22/53/14**

1. Thailand supports the EWG working group's work on the creation of a national registry database (NRD) which is useful tool for the establishment of Codex MRL as well as the periodic review for unsupported compounds without public health concern, where there is no supporting data. Besides, we would request the CCPR to set up a mechanism to operationalize NRD in the management of unsupported compounds (Agenda item 11) to reduce trade issues from no Codex MRLs and to facilitate fair trade.

2. We support the EWG to revise database according to member countries' comments. For the database exercise spreadsheet, plants and crops items should be reclassified to be in line with the newly revised Codex Classification of Food and Feed. If there are many plants and crops other than listed items, additional blank cells should be available for countries to enter detail on such plants and crops. In addition, processed commodities in Class D and E which do not directly expose to pesticides should be excluded from database spreadsheet.

### Agenda Item 13: Establishment of Codex Schedules and Priority Lists of Pesticides for Evaluation/Re-Evaluation by JMPR CX/PR 22/53/15

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 as follows:

1. In worksheet 2023-new use-other

- priority number 1 Dinotefuran (255), we would like to add FI 0334 Durian (6 trials)

- priority number 13 Novaluron (217) [Novaluron register as mixture substances between novaluron+indoxacarb] ,we would like to add GC 0649 Rice (6 trials) as follows:

1	2023 - NEW USES AND OTHER EVALUATIONS									
2	PRIORITY	DATE STAMP	TOXICOLOGY	RESIDUE	PRIORITISATION CRITERIA REGISTERED	MRLS > LOQ	COMMODITIES	RESIDUE TRIALS	MEMBER / MANUFACTURER	COMMENTS
3	2023	11/27/2019	NA	Dinotefuran (255)	Yes	Yes	SOYBEAN, GREEN TEA, PERSIMMON, PEAR, edible offal (mammalian), eggs, meat (from mammals other than marine mammals), milks, poultry meat, poultry, edible offal of, Durian	soybean (25: USA, Brazil, Argentina, Japan), green tea (10: Japan), persimmon (5: Japan), pear (6 or more: Japan, Korea), edible offal (mammalian), eggs, meat (from mammals other than marine mammals), milks, poultry meat, poultry, edible offal of, Durian (6 trial)	Mitsui Chemicals Agro	On 08 December 2020, Mitsui res also updated. On 22 December 2021 residue trials. On 23 July 2021 re
4	2023	4/25/2022	NA	Novaluron (217)	Yes	Yes	TREE NUTS, RICE	Tree nuts 912 residue trials), Rice (6 )	Adama	A top-up evaluation is requested for novaluron on tree nuts in USA
27										
28	TOTAL=13									

2. In worksheet Table 2023-periodic review priority number 5 Carbosulfan (145) Thailand confirmed supported commodities - asparagus , egg plant and mango.

3. In worksheet Table 1 – 2024-beyond new use-other priority number 9 Indoxacarb (216), we would like to add GC 0649 Rice (6 trials) as follows:

12	A	B	C	D	E	F	G	H	I	J
	2024	4/8/2022	NA	Indoxacarb (216)	No (Yes for welsh onion)	Yes	Coffee, Sunflower Subgroup 004E, low growing berries, FB 2009 (represented by Strawberry) Subgroup 010A, flowerhead brassicas, VB 0042 (represented by broccoli) Cabbage, head, WELSH ONION (ROK), RICE	Coffee (11), Sunflower (10), Strawberry (10), Broccoli (11), Cabbage, head (10), Welsh onion (6+2 processing), Rice (6)	USA/FMC, ROK (Welsh onion)	Advised by US on 8 April 2022 ROK advised on 27 April of nomination.

4. In worksheet Table 2B

- priority number 1 Carbaryl (8), we would like to add FI 4137 Mangosteen (6 trials) , FI 0342 Longan (3 trials) and FI 0345 Mango (3 trials)

### Agenda Item 15: Discussion paper on monitoring the purity and stability of certified reference material of multi-class pesticides during prolonged storage CX/PR 22/53/17

Thailand does not oppose the proposal for new work on guidelines for monitoring the purity and stability of certified reference materials during prolonged storage.

### Agenda Item 16: Mitigation of trade impacts associated with the use of environmental inhibitors in agriculture CX/PR 22/53/18

In general, Thailand has no objection to the revised guidelines.

### Agenda Item 17 Modification of Group 14 (Assorted fruits – inedible peel) CX/PR 22/53/19

Thailand does not oppose the establishment of electronic working group for the modification of the Guideline Portion of commodities to which Codex MRLs apply and which is analyzed (CXG 41-1993).

Thailand is of the view that EWG should thoroughly consider about the revision of some particular subgroups of assorted fruits – inedible peel because the purpose of the portion of commodities to which Codex MRLs apply is to reflect the use of pesticides according to Good Agriculture Practice (GAP). With this regard, modification of the portion of commodity to product with peel removed will affect the existing MRLs which has already been established from pesticide in whole fruit.

Furthermore, it should be revised in accordance with the classification of food and feed, class A Primary Food Commodities of Plant Origin which has already been revised. For example, guava is now under group 005 assorted tropical and sub-tropical fruits - edible peel.

**Agenda Item 18 Enhancing operational procedures of JMPR and CCPR to eliminate the backlog of evaluations and meet the future demand of establishment CXLs CX/PR 22/53/20**

Thailand does not oppose the establishment of electronic working group for enhancing operational procedures of JMPR and CCPR to eliminate the backlog of evaluations and meet the future demand of establishing codex maximum residue limits for pesticides.

In principle, Thailand supports the TOR of EWG to enhance operational procedures of JMPR and CCPR. We support the evaluations of new active ingredients, new uses and other evaluation as well as re-evaluation. However, we found that the number of pesticide active ingredients for re-evaluation are very low. It shows that the working mechanism is bogged down, so it needs to be improved. Thailand supports synergies with other ongoing work with CCPR EWGs. For example, JMPR/CCPR should use the national registration database to consider the re-evaluation of pesticides, particularly those unsupported without public health concern.

We would like to support the sustainable use of the resource. For example, training and capacity building should be conducted for increasing number of competent personnel to benefit the JMPR's work.