

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON THE STANDARDS AND RELATED TEXTS SUBMITTED BY THE 56TH SESSION OF THE CODEX COMMITTEE ON PESTICIDE RESIDUES FOR ADOPTION BY THE 48TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

BACKGROUND

1. This document compiles the comments on the standards and related texts as indicated in the relevant circular letter (CL 2025/70-CAC). The comments include those received through the Codex Online Commenting System (OCS)¹, or via email by the time this document was issued. The comments are as shown in Appendix I.

EXPLANATORY NOTES ON APPENDIX I

2. 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).

¹ 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.

COMMENTS IN REPLY TO CL 2025/70-CAC

Submitted by

*Argentina, Brazil, Chile, Costa Rica, Egypt, Iran (Islamic Republic of),
Panama, Paraguay, the United States of America (USA)*

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
It recognizes the invaluable scientific and technical work carried out by the Joint FAO/WHO Meeting on Pesticide Residues (JMPR), the Codex Committee on Pesticide Residues (CCPR), as well as by Codex Members and Observers. It underlines that the tireless efforts of these bodies and national experts have been fundamental to ensuring the credibility and utility of Codex Maximum Residue Limits (CXLs), thereby protecting consumer health and facilitating international trade. <u>Background and Concern</u> Attention is drawn to the planned sequencing of meetings in 2026 in which, as currently foreseen, the Codex Alimentarius Commission (CAC) is scheduled to meet before CCPR. Under this timetable, recommendations adopted by CCPR in 2026 could not be considered for adoption by the CAC until the CAC session of 2027. This postponement would result in a near-one-year delay between scientific recommendation and international adoption. This delay is particularly concerning because the JMPR is scheduled to evaluate many pesticide compounds related to several crops and crop groups. The absence of timely adoption of these Codex MRLs will have broad repercussions across global agricultural production systems. <u>Why This Matters</u> 1. WTO SPS Agreement relevance: The prompt availability of science-based international standards is essential to facilitate safe trade and to minimize unjustified restrictions under the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). Delays in adopting CXLs can create regulatory uncertainty for exporting and importing countries and may increase the risk of trade disruption and inconsistent national measures not aligned with the latest scientific assessments. 2. Practical impacts: Millions of Producers, regulators, exporters, and billions of consumers across all regions will be directly affected if the compounds and several crops must wait until 2027 for Codex approval. 3. Symbolic timing: 2026 marks the 60th anniversary of the first meeting of CCPR. It would be regrettable if, in the Committee's diamond anniversary year, its evidence-based recommendations were prevented from timely adoption due solely to scheduling. 4. A close linkage also exists with FAO's global policy on reducing food loss and waste: Failure to adopt these CCPR recommendations in a timely manner runs counter to FAO's global policy on reducing food loss and waste. Without CAC approval, commercial difficulties may arise for crops using these compounds, potentially leading to waste of agricultural products and significant harm to millions of farmers globally. <u>Proposed, Constructive Solutions</u> To avoid the adverse consequences outlined above, the following two options are proposed: A. Priority measure (preferred): That the JMPR Secretariat consider establishing a dedicated, time-limited JMPR Task Force (or "rapid reporting mechanism") with the mandate to prepare and finalize the JMPR report within the necessary timeframe so that the CCPR session can be scheduled before the CAC in 2026.	Brazil

COMMENT	MEMBER / OBSERVER
B. Alternative measure (if A is not feasible): That the CAC consider convening an extraordinary virtual session in 2026 solely to consider and adopt the recommendations of CCPR-2026. <u>Rationale for Feasibility and Low Burden</u> Historically, the adoption of CCPR recommendations by the CAC has required less than three hours of Commission time. In a targeted virtual session, this process could reasonably be completed in approximately half that time. Therefore, the logistical burden on the Commission would be minimal while the benefits for Members, producers, and consumers worldwide would be substantial. <u>Closing</u> Waiting nearly a year for the formal adoption of CCPR-2026 recommendations by the CAC (i.e. until CAC-2027) would represent a significant disadvantage to Members, their agricultural producers and to consumers around the world. It could also undermine international efforts to reduce food loss and waste. Prompt and pragmatic action is therefore urged to ensure that science-based decisions reach the international community without unnecessary delay.	

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
Adoption at Step 5/8: Maximum residue limits for pesticides in food and feed, REP25/PR, paragraph 217(i)(a), Appendix III	
Tras analizar el documento REP25/PR de la 56ª Sesión del CCPR: i. Se comunica apoyo a la adopción en el paso 5/8 de los Límites Máximos de Residuos (LMR) en alimentos y piensos, REP25/PR párrafo 217 (i)(a), Apéndice III;	Chile
Costa Rica supports.	Costa Rica
Egypt would like to thank the Codex Committee on Pesticide Residues (CCPR) and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) for their continuous efforts in evaluating pesticide , with the following comments: - for Fipronil (202): Egypt expressed its reservation on the adoption of the proposed MRL for Fipronil (202) in wheat, considering that: Fipronil is a broad-spectrum insecticide characterized by its persistence and potential accumulation in the environment and food chains. Recent scientific evaluations , including those from the European Food Safety Authority (EFSA) , have indicated possible chronic dietary exposure concerns, particularly for cereals and cereal-based products, due to the stability of Fipronil residues during processing and storage. Given that wheat and its products represent a major component of the Egyptian diet, even low residue levels could result in higher cumulative exposure among consumers. Therefore, Egypt recommends further toxicological and residue studies, especially on processing factors and long-term dietary exposure, before advancing or adopting new CXLs for Fipronil in wheat. - For Propiconazole (160) : Egypt expressed its reservation on the adoption of the proposed MRL for Propiconazole (160) in rice, taking into consideration that: Propiconazole undergoes extensive metabolic transformation in plants and may produce several metabolites whose toxicity profiles are not fully characterized. Available toxicological data appear insufficient to conclusively assess the	Egypt

COMMENT	MEMBER / OBSERVER
potential genotoxicity and chronic dietary risk of these metabolites, as highlighted in other international assessments. Since rice and rice -based products are a dietary staple in Egypt, even limited uncertainties regarding the long-term exposure to residues or metabolites could have significant implications for public health. Therefore, Egypt recommends that the proposed MRL for Propiconazole in rice be reconsidered and lowered, taking into account the current uncertainties regarding the identity, levels, and toxicity of major metabolites in cereals. Egypt further recommends conducting additional toxicological and residue studies to ensure that the established MRL adequately protects consumers from potential long-term dietary exposure	
Panamá manifiesta su apoyo a las normas y textos conexos presentados por el Comité del Codex sobre Residuos de Plaguicidas (CCPR56) para su adopción por la 48.^a reunión de la Comisión del Codex Alimentarius (CAC48). El país reconoce el rigurosos proceso científico seguido por el CCPR y el asesoramiento proporcionado por el JMPR (Reunión Conjunta FAO/OMS sobre Residuos de Plaguicidas) en la evaluación de los límites máximos de residuos, lo que garantiza la protección de la salud de los consumidores y el comercio internacional de alimentos inocuos y de calidad. Panamá valora los esfuerzos del CCPR en la armonización internacional de los LMR y en la incorporación de criterios científicos actualizados para la revisión y establecimiento de normas, lo cual contribuye directamente a fortalecer la transparencia y la coherencia de los sistemas nacionales de control alimentario. ENGLISH Panama expresses its support for the standards and related texts submitted by the Codex Committee on Pesticide Residues (CCPR56) for adoption by the 48th Session of the Codex Alimentarius Commission (CAC48). The country acknowledges the rigorous scientific process followed by the CCPR and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) in evaluating maximum residue limits (MRLs), ensuring the protection of consumer health and the facilitation of fair international trade in safe and quality food products. Panama values the CCPR's efforts in international harmonization of MRLs and in the incorporation of updated scientific criteria for the review and establishment of Codex standards, which contribute to transparency and consistency in national food control systems.	Panama
Paraguay apoya la adopción en trámite 5/8 de los LM de Residuos de Plaguicidas mencionados en el Apéndice III,	Paraguay
The United States supports final adoption of the MRLs for pesticides in food and feed at Step 5/8.	USA
Adoption at Step 8: Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage, REP25/PR, paragraph 234, Appendix VII	
"Directrices para la vigilancia de la estabilidad y pureza de los materiales de referencia y las soluciones madre de plaguicidas conexas durante el almacenamiento prolongado (Apéndice VII)" Argentina apoya rotundamente la adopción en el Paso 8 del documento mencionado, elaborado entre todos los países que colaboraron para promover esta guía internacional.	Argentina
ii. Apoyo a la adopción en el paso 8 de las Directrices para el seguimiento de la estabilidad y pureza del material de referencia y soluciones madre de plaguicidas conexas durante el almacenamiento prolongado.	Chile
Costa Rica supports.	Costa Rica

COMMENT	MEMBER / OBSERVER
The Islamic Republic of Iran expresses its support for the draft “Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage.” The document is considered technically sound and comprehensive, providing an important framework to ensure the reliability of analytical results and the traceability of pesticide reference materials. We have no additional comments or proposed amendments at this stage and consider the text ready for adoption by CAC48.	Iran (Islamic republic of)
En este sentido, Panamá apoya la adopción en el Paso 8 de los textos presentados por el CCPR56, reconociendo que reflejan un proceso técnico sólido y una base científica adecuada para su implementación por parte de los Estados Miembros. ENGLISH Accordingly, Panama supports the adoption at Step 8 of the texts submitted by CCPR56, recognizing that they are based on a sound technical process and a robust scientific foundation for implementation by Member States.	Panama
asimismo apoya la adopción de las Directrices para el Seguimiento de la estabilidad y la pureza del material de referencia y soluciones madre de plaguicidas conexas durante el almacenamiento prolongado, mencionado en el Apéndice VII.	Paraguay
The United States, having participated heavily in the technical discussions over the last few sessions, also supports final adoption at Step 8 of the Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage.	USA