

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Comments submitted by Thailand

Agenda Item 6

CX/PR 23/54/5

MRLs for pesticides in food and feed (at Steps 7 and 4)

In principle, Thailand does not object the proposed MRLs for pesticides in food and feed in this agenda item. We strongly support the proposed MRLs for Dimethoate and Omethoate in yard long bean, Emamectin benzoate in subgroup of brassica leafy vegetable, Mancozeb/Dithiocarbamate in longan and Metalaxyl in pineapple. The specific comments on certain pesticides in food and feed are as the follows;

Azoxystrobin

The recommended MRL for Azoxystrobin in Mango is 4 mg/kg, and it is indicated that this recommendation accommodates post-harvest treatment of the commodity. However, in the JMPR report, the MRLs of Azoxystrobin in Mango were established by using the submitted supervised residue trials from foliar applications, post-harvest dip treatments, and foliar and post-harvest spray applications. Moreover, we realize that some countries, including Thailand, have registered Azoxystrobin for use in farm level only. With this, we would like to seek clarification from the CCPR whether this recommended MRL can also be applied either for on-farm use or post-harvest treatment, or both.

Diazinon

Diazinon has been registered in Thailand for use on Chinese cabbage, sweet corn, and potatoes. Moreover, we notice that the rationale of the proposal on withdrawal for all CXLs of Diazinon is not due to the public health concern, but it is because the inability to conclude on the residue definition for dietary risk assessment for plant commodities, and for compliance with the MRL and for dietary risk assessment for animal commodities. Whereas, some countries have registered this substance.

Therefore, we would like to propose the retention of all CXLs for Diazinon under the 4-year rule in order to avoid trade problem, and request relevant companies to support the scientific data to JMPR for evaluation.

Quintozene

Quintozene has been registered in Thailand for use on cotton. Moreover, we notice that the rationale of the proposal on withdrawal for all CXLs of Diazinon is not due to the public health concern, but it is because the inability to conclude on the residue definition for dietary risk assessment for plant commodities, and for compliance with the MRL and for dietary risk assessment for animal commodities. Whereas, some countries have registered this substance.

Therefore, we would like to propose the retention of all CXLs for Quintozene under the 4-year rule in order to avoid trade problem, and request relevant companies to support the scientific data to JMPR for evaluation.

Agenda Item 9**CX/PR 23/54/11****Management of Unsupported Compounds without Public Health Concern Scheduled for Periodic Review**

Thailand has no objection to the proposal in Appendix 1. 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. In addition, many unsupported compounds without public health concern have been used and registered in several agricultural producing countries. The lack of MRLs for these compounds can cause serious trade problems, which are not because of public health concern. This does not create the facilitation of fair trade practices that is an objective of Codex. So that this guideline on management of unsupported compounds without public health concern scheduled for periodic review is important tool in providing MRL reference values to facilitate trade and to reduce the existing gaps between developed and developing countries.

Therefore, we support 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). With this, the NRD will provide updated information for the JMPR re-evaluation, to simplify the procedure for the periodic review. This proposal could benefit the international trade facilitation as well as consumers' health protection. In addition, we are of the view that the review on the updated information of "GAP" is needed to consider the suitability in the retention or adjustment of CXLs instead of deleting the CXLs of the compounds without public health concern.

Agenda Item 10**CX/PR 23/54/12****National registrations of pesticides**

Thailand would like to appreciate the electronic working group chaired by Germany and co-chaired by Australia for hard working in the development of national registration database. We strongly support the continuation of this work as it is a useful tool for the establishment of Codex MRLs as well as the periodic review for unsupported compounds without public health concern, where there is no supporting data. Besides, we would like to request the CCPR to set up a mechanism to operationalize NRD in the management of unsupported compounds (Agenda item 9) to reduce trade issues from the absence of Codex MRLs and to encourage fair practices in food trade.

For the database, we agree with this proposed tabular form, as it is simple and easy to fill out. Also, the application of the list of fruits and vegetables from the revised Codex classification makes it easier for users to fill in data. The list of selected pesticides from group 1 and 2 are also suitable. The data in the excel table, thus, is complete and can be used for the review.

Agenda Item 11**CX/PR 23/54/13****Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR**

Thailand agrees with Codex schedules and priority list of pesticides for evaluation/re-evaluation by JMPR.

For specific comments:

B. Finalising the 2024 proposed schedule

We would like to confirm the submission of Dinotefuran in durian and Novaluron (registered as a mixture of substances between Novaluron and Indoxacarb) for evaluation by JMPR in rice in '2024 new use – other' worksheet.

In addition, we would like to propose additional information of Azoxystrobin in Chinese broccoli and chili for evaluation by JMPR in '2024 new use – other' worksheet.

C. Priority lists 2025 and beyond – table 1

We would like to confirm the submission of Indoxacarb (registered as a mixture of substances between Novaluron and Indoxacarb) in rice for evaluation by JMPR in 'Table 1 – 2025 & beyond - new use - other' worksheet.

Monitoring the purity and stability of certified reference material of multiclass pesticides during prolonged storage

First of all, Thailand would like to extend our appreciation to the electronic working group chaired by India and co-chaired by Argentina and Iran for preparing the discussion paper, project document and outline of proposed guidance for monitoring the stability of reference material purity of pesticides during prolonged storage.

In general, we do not have any objection to discuss on the monitoring of the purity and stability of certified reference material of multi-class pesticides during prolonged storage. However, we are of the opinion that the scope of this work should be considered and clarified that guidance will be used for prolonging the expired CRMs (metrologically traceable) or commercial RMs (no metrological traceability), or both. Moreover, the purpose of the utilization of prolonged CRMs and/or RMs that are verified based on this guidance should be clearly specified in order to avoid confusion since the expired CRM cannot be used for calibration (creating a calibration curve in measurement) but still can be used for quality control or screening. In principle, the utilization of verified prolonged CRM or RM should be accepted under relevant international standards that laboratories shall be applied for certification to avoid international trade problems. The guidance should provide the confidence that the laboratories should be conformed to International Standards such as ISO/IEC 17025.

To continue this work, Thailand has no objection to the establishment of EWG to prepare guidance on monitoring the stability of reference material purity of pesticides during prolonged storage. However, we believe that the inclusiveness and participation of key sectors relevant to the global acceptance of the application of CRM and/or RM will be useful for the development of clear and appropriate proposal and guidance. With this regard, any suggestion and recommendation from the regulatory bodies, such as ISO, REMCO and RMP, should be included.

We also have some specific comments on the discussion paper, project document and outline of proposed guidance as follows:

- In the references of the discussion paper (Appendix I), we would like to propose the deletion of the reference "ISO Guide 34:2009" which is currently replaced by ISO/IEC 17034:2016.
- The purpose and scope of new work in the project document (Appendix II) and the objective of proposed guidance (Appendix III) shall be clarified on the classification of CRM and RM, the materials that the guidance can be applied for verification, and the utilization of the verified prolonged CRMs or RMs as mentioned in our general comment.
- In the section of Analytical Protocol for Determining the Purity of Reference Materials in the outline of proposed guidance (Appendix III), we have specific comments as follows:

We realize that monitoring the purity of RMs during prolonged storage should be carried out periodically based on ISO 17034 and ISO Guide 35. The competence of the laboratory conducting the measurement shall be ensured by accreditation to the ISO/IEC 17025 in the scope relevant to the measurement concerned. Therefore, we would like to propose an addition at the end of paragraph 7 as follows:

"7. The purity of the RMs during prolonged storage should be monitored periodically, preferably biannually and compared with the purity of the RM as mentioned in the CoA, before and after expiration using the same analytical protocol. The analysis should be conducted in an ISO 17025 accredited laboratory, **with the scope relevant to the measurement concerned.**"

We would like to suggest that an appropriate statistical method shall be applied to evaluate the stability of RMs. Setting suitable criteria should be fit for intended use, such as acceptable uncertainty in measurement.

- The definitions given in the outline of the proposed guidance (Appendix III) should be in accordance with the definition given by the ISO Committee on Reference Materials (REMCO) such as ISO Guide 30, especially reference material (RM), certificate of analysis (CoA) and reference material producer (RMP). With this regard, the definition of CRM should be provided if the context of the proposed draft guideline addresses CRM.

Enhancement of the operational procedures of CCPR and JMPR

In principle, Thailand supports the need to enhance the operational procedures of CCPR/JMPR to respond to the anticipated demand for evaluation and thus accomplish the schedule of priority lists of pesticides for evaluation by JMPR. We encourage the balanced evaluation among all three areas of work undertaken by JMPR, including, new active ingredients, new uses, and re-evaluation. JMPR should consider the comments and recommendations received from member countries for reviewing its operational procedures.