



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

#### Fifty-fifth Session

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### MANAGEMENT OF UNSUPPORTED COMPOUNDS WITHOUT PUBLIC HEALTH CONCERN SCHEDULED FOR PERIODIC REVIEW

(Prepared by the Electronic Working Group chaired by Chile  
and co-chaired by Ecuador, India, and Kenya)

Codex members and observers wishing to submit comments on the recommendations in paragraph 21 should do so as instructed in CL 2024/46-PR available on the Codex webpage<sup>1</sup>

#### 1 BACKGROUND

1. At the 54<sup>th</sup> Session of the Codex Committee on Pesticide Residues (CCPR54, 2023), the chair of the Electronic Working Group (EWG) on unsupported compounds proposed an approach for the management of unsupported compounds including options for efficient data support that could be addressed by Codex, FAO/WHO, the Joint FAO/WHO Meeting on Pesticide Residues (JMPR), governments, industry, and other relevant stakeholders to further assist countries in implementing the proposed management approach, and the establishment of an EWG to implement the management approach.
2. Noting support for the proposals, the CCPR54 agreed to:
  - i. adopt the management approach for internal use by CCPR;
  - ii. publish the options for data support as an information document on the Codex webpage; and
  - iii. establish an EWG on Unsupported Compounds Without Public Health Concern Scheduled For Periodic Review chaired by Chile, and co-chaired by Ecuador, India, and Kenya, with the following Terms of Reference (ToRs):
    - a. to implement the management procedure for unsupported compounds without health concerns for periodic review;
    - b. to consider the unsupported compound identified under the priority list in the implementation of the management procedure;
    - c. to coordinate with the Chairs of the EWGs on Priorities and the Database on National Registrations of Pesticides, respectively, on the identification of other possible unsupported compounds in accordance with the management procedure; and
  - iv. based on the above considerations to present the outcomes of the actions made for consideration by CCPR55.<sup>2</sup>

<sup>1</sup> Codex webpage/Circular Letters:  
<http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>.

Codex webpage/CCPR/Circular Letters:

<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

<sup>2</sup> REP23/PR54, para. 220-226

3. According to point (b) of the ToR, and based on the outcomes of the discussion on Codex schedules and priority lists of pesticides for evaluation by JMPOR, the Chair of the EWG on Priorities advised CCPR as follows:
  - i. The following compounds from previous schedules of periodic reviews were not evaluated by JMPR and appears to be unsupported: amitraz (122), dinocap (87), methamidophos (100), bitertanol (144) and fenthion (39) and parathion-methyl (59).
  - ii. A member had advised that amitraz had dual uses and should be considered by the EWG on Coordination of Work between CCPR and the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF).
  - iii. The list of unsupported compounds mentioned in point (i) be forwarded to the EWG on Unsupported Compounds as a future work program.
  - iv. JMPR advice on methamidophos (100) and dinocap (87) cautioned of potential problems for trade and implementation of CXLs for acephate (95) and meptyldinocap (244) if CXLs for methamidophos (100) and dinocap (87) were removed. The EWG on Unsupported Compounds should consider these impacts and make recommendations to CCPR.
4. CCPR55 agreed to forward these proposals for consideration by the EWG on Unsupported Compounds.<sup>3</sup>

## 2 WORK PROCESS

5. The EWG was joined by several member countries, observer organizations and a Member Organization. The list of participants is presented in Appendix I.
6. A working document was prepared providing detailed information on amitraz (122), dinocap (87), methamidophos (100), bitertanol (144), fenthion (39) and parathion-methyl (59) which included:
  - MRLs in force as of October 2023 according to the Codex Database for Pesticides.
  - Records and details of previous periodic reviews based on JMPR reports.
  - Situation of support of the compounds and their respective Codex maximum residue limits (CXLs) based on CCPR reports and related working papers issued on Codex schedules and priority lists of pesticides.
  - National registration status based on working papers issued in relation to national registration of pesticides and additional data/information available from the public domain.
  - Where applicable, background information was provided regarding specific situations based on data/information available from the public domain (e.g., amitraz dual uses and the possible repercussions of the withdrawal of the MRLs of methamidophos and dinocap on the compounds acephate and meptyldinocap respectively).
7. The EWG were requested to submit comments to in line with the approach agreed by CCPR55 for internal use as described in REP23/PR54, Appendix XII – Management of unsupported compounds without public health concern scheduled for periodic issue, specifically, paragraphs 5 and 6:

*“5. Member states that notice that the Codex maximum residue limits (CXLs) for a compound are not supported and the country itself is not in a position to generate the data, should communicate such concern to the Chair of the EWG on Unsupported Compounds in response to the Circular Letter that the Chair of the EWG on Priorities issue in September each year, which includes, among others, Tables 2A and 2B. (Amitraz, dinocap, methamidophos, bitertanol, fenthion, and parathion methyl)”*

*“6. In said communication, the member state must provide detailed information about which CXLs it is interested in supporting, as well as information on national register status, the surface (ha) of the crop treated with the pesticide, international trade data or others (e.g., availability of the alternatives etc.) that justify the efforts to generate data.”*

8. Additionally, members and observers of the EWG were requested to submit comments on the best course of action regarding amitraz, methamidophos/acephate and dinocap/meptyldinocap cases based on the background provided, to recommend to CCPR 55

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<sup>3</sup> REP23/PR54, paras. 243-247

9. Comments were received from Uruguay and Germany.

### 3 KEY POINTS OF DISCUSSIONS

#### 3.1 Concerns Received Over Possible Revocation of CXLs

10. According to ToR (b), the EWG should consider the unsupported compounds identified under the priority list, amitraz (122), dinocap (87), methamidophos (100), bitertanol (144), fenthion (39) and parathion-methyl (59) in the implementation of the management procedure.
11. According to the agreed approach, member countries that notice that the CXLs for a given compound are not supported by the manufacturer, and the country itself is not in a position to generate the necessary data, should communicate such concern to the Chair of the EWG on Unsupported Compounds in response to the Circular Letter (CL) that the Chair of the EWG on Priorities issue each year, which includes, among others, Tables 2A (pesticides scheduled for periodic review) and 2B (pesticides that have been last evaluated 15 years ago or more but not yet scheduled for periodic review), and in reply to this CL, the member country should provide detailed information about which CXLs the country is interested in supporting, as well as information on national registration status, the surface (ha) of the crop treated with the pesticide, international trade data or others (e.g., availability of the alternatives etc.) that justify the efforts to generate data.
12. For this exercise, the Chair of the EWG on Unsupported Compounds did not receive any expression of concern about the possible revocation of the CXLs of the indicated compounds nor requests for data generation support.

#### 3.2 Amitraz

13. Regarding amitraz, one member reported that the compound had dual uses and should be considered by the EWG on Coordination of Work between CCPR and CCRVDF.
14. The EWG received a comment that amitraz met the requirements to be considered as a dual use compound but did not express any concern about the lack of support for the compound.
15. Nevertheless, the EWG was provided with the following information:
- CCRVDF has not established MRLs for amitraz according to the Codex Database on MRLs for Veterinary Drugs in Foods.<sup>4</sup>
  - Apparently, the compound is not scheduled to be evaluated by JECFA in the short or medium term.
  - Amitraz has veterinary use to control external parasites in domestic animals, however it is also used as a miticide to control varroa in beehives. Because of this, there would be some concerns regarding setting an MRL for honey.

#### 3.3 Potential problems for trade and implementation of CXLs for meptyldinocap (244) if CXLs for dinocap (87) were removed

16. If CXLs for dinocap are to be revoked, the issue would be whether use of meptyldinocap can result in detections of dinocap, which may have trade impacts. For dinocap, the impact would be on the existing CXLs for meptyldinocap. Most of CXLs for meptyldinocap will no longer be supported if dinocap is removed from the Codex list since the CXLs for meptyldinocap have been set based on the studies of dinocap.
17. A member suggested to delete all dinocap CXLs. The residue definition for MRL differs in so far that dinocap covers also dinocap phenols but in both cases all dinocap isomers should be analysed. Under the assumption above, there is no need to have dinocap CXLs in place since methyl-dinocap has its own CXLs. The fact that CXLs for methyl-dinocap have been set on the basis of dinocap is a mistake, meaning that the CXLs are too high but do not hinder deleting obsolete dinocap CXLs.

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<sup>4</sup> <https://www.fao.org/fao-who-codexalimentarius/codex-texts/dbs/vetdrugs/en/>  
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-standards/en/?committee=CCRVDF>

### **3.4 Potential problems for trade and implementation of CXLs for acephate (95) if CXLs for methamidophos (100) were removed**

18. If CXLs for methamidophos are removed, there may be consequences on the CXLs for acephate i.e. can acephate breakdown and produce methamidophos which, if no CXLs exist, could result in trade impacts due to use of acephate?
19. For methamidophos, there may be a problem for trade as well as for implementation (compliance) of CXLs for acephate if the CXLs for methamidophos are revoked. A main metabolite of acephate is methamidophos. Residues of methamidophos arising from the use of acephate must be reconciled with an MRL for compliance purposes. This could be achieved either by defining the residue of acephate as the sum of acephate and methamidophos or by establishing specific methamidophos MRLs for methamidophos residues arising from the use of acephate.
20. A member indicated that, provided that no member country insists on having data to support the use of methamidophos, and is willing to act as a data submitter, some methamidophos CXLs could be deleted immediately. In the first step, the CXLs for cotton seed, fodder beet, potato and sugar beet could be deleted since these commodities have no CXLs for acephate. The member questioned whether other CXLs for methamidophos, except rice, hay and/or straw and rice, husked, are necessary. Acephate has more CXLs in place (e. g. cabbage head, cranberry) than methamidophos and the only commodities where it is mentioned that they are needed for the use of acephate. These are the CXLs for rice, hay and/or straw and rice, husked. In a second step, JMPR could be asked to revise its old evaluation to make sure that all uses of acephate are covered by an adequate CXL of methamidophos and not by a CXL for a use of methamidophos.

## **4 RECOMMENDATIONS**

21. CCPR is invited to consider the following recommendations, based on the issues raised under the key points of discussion:
  - i. To revoke all CXLs for bitertanol, fenthion, and parathion methyl
  - ii. For amitraz, to revoke all its CXLs, since no concerns were received. For the same reason, coordination with the CCRVDF is not considered necessary since said committee has not established MRLs for this compound. If a member later requests some CXLs for amitraz, that could be the case.
  - iii. To delete all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap, until the periodic review of meptyldinocap is carried out. Some inconsistencies in the CXLs database regarding dinocap in Fruiting vegetables, cucurbits (group) and cucumber should be addressed.
  - iv. To delete all CXLs for methamidophos with the exception of those in rice, hay and/or straw and rice, husked commodities, which CXLs were set because residues of methamidophos arises from acephate uses.

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