CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 6.1

CX/PR 25/56/5-Add.1
September 2025
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Fifty-sixth Session

Santiago, Chile

8 - 13 September 2025

MRLS FOR PESTICIDES IN FOOD AND FEED (AT STEP 4)

Comments at Step 3 in reply to CL 2025/35-PR

submitted by

Australia, Brazil, Canada, Chile, Colombia, Cuba, Egypt, Peru, Thailand, Uruguay, Comité européen des fabricants de sucre (CEFS), CropLife International

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/35-PR[1] issued in July 2025, as well as a concern form received in response to CL 2024/89-PR[1] issued in January 2025. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as Annex I and are presented in tabulated format.

3. The concern form received is hereby attached as Annex II.

[1] https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/
https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR

ANNEX I

GENERAL COMMENTS

COMMENT	MEMBER/OBSERVER
Brazil wishes to thank the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) for its valuable work and technical expertise in evaluating the compounds and commodities listed in CL 2025/35-PR, as considered during the 2025 JMPR Meeting. The Brazilian Health Regulatory Agency (ANVISA) conducted a short-term dietary risk assessment for the compounds/commodities listed in CL 2025/35-PR, in relation to the proposed MRLs at Step 3 of the Codex Procedure, as considered by the 2025 JMPR Meeting. The risk assessment methodology followed WHO/FAO guidelines. Data on individual food consumption and body weight for individuals over 10 years of age were based on the Brazilian Household Budget Survey report. The evaluation covered only pesticides approved for use in Brazil: acetamiprid, acibenzolar-S-methyl, azoxystrobin, buprofezin, chlormequat, cyclobutrifluram, cyproconazole, etofenprox, fenpropidin, fenpyroximate, fipronil, florpyrauxifen-benzyl, flubendiamide, fluoxapiprolin, flupyradifurone, folpet, fosetyl-aluminium, hexythiazox, methoprene, novaluron, phosmet, propiconazole, pydiflumetofen, spinosad, tebuconazole, and tebufenozide. Based on the results of the short-term dietary risk assessment, Brazil did not identify any cases in which the ARfDs were exceeded. Therefore, the proposed MRLs in CL 2025/35-PR for pesticides approved in Brazil are not expected to pose a public health concern for Brazilian consumers. Brazil reiterates its appreciation to the JMPR for its thorough scientific assessments, which are essential to ensuring the protection of consumers and the harmonization of international food standards.	**Brazil**
Canada supports the advancement of all MRLs for animal commodities to Step 5/8, where applicable, based on the new Codex Classification for animal commodities (see 2024 JMPR General Considerations Item 2.4). Among the 37 compounds assessed at the 2024 JMPR, MRLs could not be recommended or were withdrawn for 7 compounds based on lack of critical residue chemistry and toxicology data to establish health-based guidance values (HBGVs), residue definitions for compliance and/or dietary risk assessments. In light of the limited JMPR resources, Canada supports JMPR's approach of prioritizing dossiers for review that are complete and address all the required residue and toxicology data outlined in the JMPR call for data (see 2024 JMPR General Considerations Item 2.10).	**Canada**
Considerando que es relevante que el Codex avance en el estudio y determinación de LMRs de aquellos principios activos que se usan regularmente, Chile apoya todas las recomendaciones realizadas por la JMPR como órgano científico asesor del Codex para este Comité, y por lo tanto, cuando corresponde, el avance en el trámite correspondiente en miras a su adopción por la 48 reunión de la Comisión del Codex Alimentarius.	**Chile**
Colombia quiere anotar una preocupación, para los LMR que se están suprimiendo (W) debido a que los datos a portados no soportan la totalidad de los residuos. Entendiendo el porqué de la decisión, solicitamos que la revisión se enliste en los calendarios de evaluación de la JMPR de los próximos dos años, ya que, para el caso de moléculas como folpet (en papa, Uva y cebolla) y procloraz (frutos tropicales de piel no comestible, cítricos), limita el uso de las mismas, en mercados de frutos con proyecciones de exportación.	**Colombia**

COMMENT	MEMBER/OBSERVER
Cuba apoya los LMR propuestos rn 2024 por el JMPR en trámte 3 en la CL 2025/35-PR	**Cuba**
Egypt would like to express its appreciation for the considerable efforts invested in the preparation of this document and acknowledges the valuable work reflected therein. In this context, Egypt has included comments on certain pesticide residue limits	**Egypt**
Perú agradece por el esfuerzo emprendido. No se cuenta con observaciones, por lo que se sugiere continuar con el trámite correspondiente.	**Peru**
Uruguay would like to express its appreciation for the work undertaken by the experts of the Joint FAO/WHO Meeting on Pesticide Residues (JMPR), as reflected in the 2024 JMPR Report, as well as to the Codex Secretariat for the preparation of Circular Letter CL 2025/35-PR. We would like to emphasize the importance for Uruguay of continued progress in establishing MRL recommendations for pesticides that are widely used by producers. Uruguay supports the JMPR recommendations for MRLs concerning new pesticides and new uses of pesticides already listed in Codex. With regard to pesticides under periodic review, particularly Folpet, Phosmet, Maleic Hydrazide, and Prochloraz, Uruguay respectfully requests that the MRLs indicated in the circular not be revoked, as several of these MRLs are of significant importance for our country. In cases where no public health concerns have been identified, we kindly request that these compounds be referred to the Electronic Working Group on Unsupported Compounds, so that the procedure on the “Management of Unsupported Compounds Not of Public Health Concern Scheduled for Periodic Review” may be duly applied.	**Uruguay**

SPECIFIC COMMENTS

COMMENT	MEMBER/OBSERVER
ACETAMIPRID (246)	
MRL for Subgroup of dry peas should be corrected from 0.24 to 0.2 mg/kg. Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed pulses to Step 5/8.	**Canada**
ACIBENZOLAR-S-METHYL (228)	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
ACYNONAPYR (333)* **	
JMPR (2024) did not have enough time to conclude the residue definitions, so it decided to postpone the evaluation to the 2025 JMPR.	**Australia**
Canada acknowledges that JMPR was unable to conclude on the residue definitions and that the evaluation of this new compound will be postponed to the 2025 JMPR.	**Canada**
AZOXYSTROBIN (229)	
MRLs for Group of avian, edible offal of, Group of avian fats, Group of avian muscle and Group of eggs should be corrected from 0.01 to 0.01* mg/kg. STMR values for orange juice, Hops beer and pineapple juice should be included. The STMR listed for watermelon (0.02 mg/kg) should be for pulp. Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports advancement of the MRLs for the listed new crops to Step 5/8.	**Canada**
BUPROFEZIN (173)	
The STMP and HR values of 0 should be listed for the four avian commodities. Australia supports advancement of the MRL to Step 5/8.	**Australia**

COMMENT	MEMBER/OBSERVER
Canada acknowledges that maximum residue levels for rice could not be estimated since JMPR could not conclude on the residue definition for paddy rice.	**Canada**
CARFENTRAZONE-ETHYL (338)* **	
As the meeting could not conclude on residue definition for plant and animal commodities, MRLs in plant and animal commodities could not be estimated.	**Australia**
Canada acknowledges that maximum residue levels for plant and animal commodities could not be estimated since JMPR could not conclude on the residue definition for either of these commodities.	**Canada**
CHLORPYRIFOS (17)**	
As the meeting could not conclude on residue definition for plant and animal commodities, MRLs in plant and animal commodities could not be estimated. There was also insufficient toxicological data to establish ADI or ARfD.	**Australia**
Canada acknowledges that the available toxicological database was insufficient to establish health based guidance values (HBGVs) nor could a residue evaluation be performed based on the data submitted.	**Canada**
Molécula prohibida en el país (Resolución 6365/2023).	**Colombia**
This response is provided for clarification. Chlorpyrifos lacked critical residue and toxicology data to establish health-based guidance values, as well as residue definitions necessary for compliance and/or dietary risk assessments. In 2021, Egypt's Agricultural Pesticide Committee decided to ban the use of chlorpyrifos in products intended for export, with a grace period valid until 30 June 2022. By May 2024, official sources confirmed that chlorpyrifos had been removed from Egypt’s 2024 pesticide recommendations, and its license was formally revoked.	**Egypt**
CHLORMEQUAT (015)	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRL for barley to Step 5/8.	**Canada**

COMMENT	MEMBER/OBSERVER
CYCLOBUTRIFLURAM (339)* **	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRL for banana to Step 5/8.	**Canada**
CYPROCONAZOLE (239)	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
ETHOXYQUIN (035)**	
Insufficient toxicological data to establish ADI or ARfD. Established pear MRL recommended for withdrawal.	**Australia**
Canada acknowledges that the established MRL for pear is to be withdrawn based on insufficient toxicology data, which precluded the establishment of a residue definition for risk assessment.	**Canada**
ETOFENPROX (184)	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for rice (grain, husked and polished) to Step 5/8.	**Canada**
Etofenprox- Arroz: Es importante tener en cuenta que los resultados de la evaluación se presentan como porcentaje de la IDA y ARfD de cada compuesto. Así, los valores resaltados en la tabla superan los valores de las dosis de referencia, lo cual indica que los LMR nuevos no brindan seguridad para la población colombiana por ingesta del compuesto asociado al alimento correspondiente.	**Colombia**
Egypt recommends lowering the Maximum Residue Limits (MRLs) for the following pesticides for Etofenprox (184) in rice. This recommendation is based on the high consumption rates of wheat and rice in Egypt, with an emphasis on the need to rely on the most recent toxicological studies, as the studies cited in the document are outdated.	**Egypt**

COMMENT	MEMBER/OBSERVER
FENPROPIDIN (340)* **	
JMPR report recommended MRL for AS 3304 Subgroup of cereal grains (including pseudocereals) feed products with low water (<20%) content (hay and/or straw), not AS 0081 Straw and hay of cereal grains. Level is 4 mg/kg (dw). Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
Fenpropidin- banana: Es importante tener en cuenta que los resultados de la evaluación se presentan como porcentaje de la IDA y ARfD de cada compuesto. Así, los valores resaltados en la tabla superan los valores de las dosis de referencia, lo cual indica que los LMR nuevos no brindan seguridad para la población colombiana por ingesta del compuesto asociado al alimento correspondiente.	**Colombia**
We would like to highlight that the European Union currently enforces a maximum residue level (MRL) of 0.07 mg/kg for fenpropidin in sugar beet. This limit is based on a scientific assessment by the European Food Safety Authority (EFSA), which reviewed GAP-compliant residue trials. The highest residue level observed in these trials was 0.06 mg/kg in sugar beet roots, supporting the adequacy of the established MRL of 0.07mg/kg. To date, EFSA has found no evidence of safety concerns or health risks to consumers associated with this level. In this light, we recommend aligning the Codex MRL for fenpropidin in sugar beet with the current EU standard of 0.07 mg/kg, thereby promoting regulatory consistency and maintaining strong consumer protection.	**CEFS**
FENPYROXIMATE (193)	
The 2024 JMPR report confirmed the 2017 decision with regards to the subgroup of beans with pods (maximum residue level, STMR and HR of 0.5, 0.075 and 0.42 mg/kg, respectively) and eggplants (0.3, 0.1, 0.17), however acute intake concerns were identified for both commodities. These commodities were not listed in CL 2025/35-PR. Australia considers it important that all new MRL recommendations which confirm previous recommendations are shown in the relevant CLs and CCPR agenda papers. Even if there are no intake concerns, it is important that the Codex CXL database shows the date of the latest JMPR evaluation. Australia supports advancement of the MRLs to Step 5/8, except where the ARfD was exceeded namely the group of edible offal, mammalian, beans with pods, and eggplants. Australia supports revocation of the CXLs for those commodities associated with acute intake concerns identified by the 2021 JMPR and for which new data was not evaluated by the 2024 JMPR. (for example, stone fruit)	**Australia**
Canada supports the advancement of the MRLs for the listed crops and processed commodities to Step 5/8.	**Canada**

COMMENT	MEMBER/OBSERVER
Thailand objects to the adoption of the recommended MRL in edible offal (mammalian) (MO 0105) at 0.8 mg/kg, as the results of the acute dietary exposure risk assessment exceeded the safety threshold (140% of the ARfD for the general population and 120% of the ARfD for children). In addition, Thailand proposes the revocation of the CXL of Fenpyroximate in subgroup of beans with pods (VP 2060) at 0.5 mg/kg and subgroup of eggplants (VO 2046) at 0.3 mg/kg, since the results of the acute dietary exposure risk assessment also exceeded the safety threshold. The %ARfD for beans with pods was 110% for Canadian children (> 6 years), while the %ARfD for the eggplant subgroup was 160% for Chinese children (1–6 years).	**Thailand**
FIPRONIL (202)	
JMPR report recommended withdrawal of MRL for VP 2060 'Beans with pods, subgroup of' not VP 0060 Legume vegetable, group (neither however are currently in Codex database). The codex database lists an MRL for cattle milk, which should be withdrawn should the MRL for Group of milks be established. Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
Molécula prohibida en el país (Resolución 0740 de 2023).	**Colombia**
Egypt recommends lowering the Maximum Residue Limits (MRLs) for the Fipronil (202) in wheat. This recommendation is based on the high consumption rates of wheat and rice in Egypt, with an emphasis on the need to rely on the most recent toxicological studies, as the studies cited in the document are outdated.	**Egypt**
Thailand realized that the Codex MRL of fipronil in basil was developed by using supervised residue trial data of Thailand. Additionally, this substance is still registered for basil and yard long bean. Therefore, we would like to retain the Codex MRLs of Fipronil in basil (HH 0722) and group of legume vegetables (VP 0060) under the 4-year rule. To fulfill the data requirements for maintaining these MRLs, Thailand will provide supervised residue trial data on basil and yard long bean for evaluation by JMPR to establish Codex MRLs for basil and yard long bean.	**Thailand**

COMMENT	MEMBER/OBSERVER
On behalf of the data sponsor: For VD 2066 Dry peas, subgroup of: As per page 206 and Table 5.15.15 of the JMPR report, STMR for dry beans and dry peas is 0.002 mg/kg.	**CropLife International**
On behalf of the data sponsor: For VL 0053 Leafy vegetables, group of: Page 214 and table 5.15.15 of the JMPR report state via footnote that this MRL is related to rotational crops. In case it is relevant for this table, it should be added.	
On behalf of the data sponsor: For VD 2065 Dry beans, subgroup of: As per page 206 and Table 5.15.15 of the JMPR report, STMR for dry beans and dry peas is 0.002 mg/kg.	
On behalf of the data sponsor: For VR 0075 Root and tuber vegetables, group of (except potato and sugar beet): Page 214 and table 5.15.15 of the JMPR report state via footnote that this MRL is related to rotational crops. In case it is relevant for this table, it should be added.	
On behalf of the data sponsor: For AB 0541 Soya bean hulls: The correct code should be AL 3568.	
On behalf of the data sponsor: For VO 2045 Tomato, subgroup of: The text on page 205 of the JMPR report states an STMR of 0.004 mg/kg. Please verify which value is correct for STMR.	
On behalf of the data sponsor: Table 5.15.15 of the JMPR report lists VP 2060 Beans with pods, subgroup of for withdrawal of the current MRL of 0.01 mg/kg. Please add to this list if deemed necessary.	
FLORPYRAUXIFEN-BENZYL (341)	
PE0112 should be Group of Eggs. Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
FLUAZINAM (306)* **	
Not considered at 2024 JMPR meeting.	**Australia**
Canada acknowledges that only the toxicology of fluazinam was assessed at the 2024 JMPR.	**Canada**

COMMENT	MEMBER/OBSERVER
FLUBENDIAMIDE (242)	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for rice (grain, husked and polished) to Step 5/8.	**Canada**
FLUOXAPIPROLIN (342)* **	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops and processed commodities to Step 5/8.	**Canada**
On behalf of the data sponsor: For VO 0448 Tomato, dried fruit: From page 511 of the JMPR report: We would like to point out that we noticed that a differing value is listed in the JMPR Report in table 5.19.12 on page 302 (0.6 mg/kg instead of 0.32 mg/kg). We propose to replace the value given in this table (0.32 mg/kg) with 0.6 mg/kg.	**CropLife International**
On behalf of the data sponsor: For VO 0448 Tomato: From Page 511 of the JMPR report: We would like to point out that we noticed that a differing value is listed in the JMPR Report in table 5.19.12 on page 302 (0.1 mg/kg instead of 0.07 mg/kg). We propose to replace the value given in this table (0.07 mg/kg) with 0.1 mg/kg.	
FLUPYRADIFURONE (285)	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for olives and rapeseed to Step 5/8.	**Canada**
FOLPET (041)**	
Australia supports advancement of the MRL to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
Folpet: Uruguay requests that the MRLs for apple, cucumber, grape, melon, onion, potato, strawberry, and tomato not be revoked. We further request that Folpet be considered within the Electronic Working Group on Unsupported Compounds.	**Uruguay**

COMMENT	MEMBER/OBSERVER
FOSETYL ALUMINIUM (302)	
Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for the listed crops and processed commodities to Step 5/8.	**Canada**
Thailand strongly supports the adoption of the recommended MRLs of fosetyl aluminum in rice (GC 0649) at 40 mg/kg and polished rice (CM 1205) at 40 mg/kg, as the results of the dietary assessment for both chronic and acute indicate safety.	**Thailand**
HEXYTHIAZOX (176)	
Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for caneberries and dried hops to Step 5/8.	**Canada**
LAMBDA-CYHALOTHRIN (146)	
Not considered at 2024 JMPR meeting.	**Australia**
Canada acknowledges that only the toxicology of lambda-cyhalothrin was assessed at the 2024 JMPR.	**Canada**
MALEIC HYDRAZIDE (102)	
Insufficient toxicologic data were provided to establish ADI and ARfD.	**Australia**
Canada acknowledges that all established MRLs are to be withdrawn based on insufficient toxicology data to establish HBGVs and residue definitions for risk assessment.	**Canada**
Maleic Hydrazide: Uruguay requests that the MRLs for onion and potato not be revoked. Maleic Hydrazide is already included in the JMPR calendar for 2026 (CL 2025/44-PR, Appendix A, Table 2A: Priority List of Periodic Reviews – 2026).	**Uruguay**
METHOPRENE (147)	
Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRL for tree nuts to Step 5/8.	**Canada**

COMMENT	MEMBER/OBSERVER
NOVALURON (217)	
The MRL for poultry muscle should be removed (covered by Group of avian muscle. The MRL for MM0095 should be Group of Muscle (from mammals other than marine mammals). Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for almond hulls and rice (grain, polished) to Step 5/8.	**Canada**
Novaluron- Arroz: Es importante tener en cuenta que los resultados de la evaluación se presentan como porcentaje de la IDA y ARfD de cada compuesto. Así, los valores resaltados en la tabla superan los valores de las dosis de referencia, lo cual indica que los LMR nuevos no brindan seguridad para la población colombiana por ingesta del compuesto asociado al alimento correspondiente.	**Colombia**
Thailand strongly supports the adoption of the recommended MRLs of novaluron in rice (GC 0649) at 5 mg/kg and polished rice (CM 1205) at 0.15 mg/kg, as the results of the dietary assessment indicate safety.	**Thailand**
PERMETHRIN (120)**	
Not considered at 2024 JMPR meeting.	**Australia**
Canada acknowledges that JMPR was unable to establish HBGVs based on insufficient toxicology data.	**Canada**
On behalf of the data sponsor: As agreed during CCPR55, the data sponsor has submitted additional data in accordance with guidance received from the WHO secretary to support the continued evaluation of permethrin (120) during the 2025 JMPR.	**CropLife International**
PHOSPHONIC ACID (301)	
Australia supports advancement of the MRLs to Step 5/8.	**Australia**
See Canada's comments for fosetyl aluminium.	**Canada**

COMMENT	MEMBER/OBSERVER
PHOSMET (103)**	
The STMR for phthalamic acid as folpet should be: 8.0 mg/kg for blueberries 1.8 mg/kg for cranberries 0.78 mg/kg for potato The STMR for phthalic acid in potato should be 0.23 mg/kg. Australia supports advancement of the MRLs to Step 5/8, except for blueberries where the estimated acute exposure exceeded 100% of the ARfD.	**Australia**
Canada supports the advancement of the MRLs for cranberries, blueberries and potatoes to Step 5/8. Canada acknowledges the withdrawal of several MRLs based on the lack of sufficient supervised field trials matching the cGAP.	**Canada**
Thailand objects to the adoption of the recommended MRLof phosmet in blueberries (FB 0020) at 20 mg/kg, as the results of the acute dietary exposure risk assessment exceeded the safety threshold (650% of the ARfD for the Canadian children and 520% of the ARfD for general population). Moreover, due to very high exposure, it is therefore considered the necessary to revoke the existing Codex MRL at 10 mg/kg in particular that its dietary risk assessment indicates that the intake is unsafe.	**Thailand**
Phosmet: Uruguay requests that the MRLs for citrus fruits, pome fruits, tree nuts, and peach not be revoked. We further request that Phosmet be considered within the Electronic Working Group on Unsupported Compounds.	**Uruguay**
PROCHLORAZ (142)**	
The MRL for AS 3569 Rye, hay and/or straw should be removed. Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada acknowledges that only the residues of prochloraz were assessed at the 2024 JMPR. Canada supports the advancement of the MRLs for the listed crops to Step 5/8. Canada acknowledges the withdrawal of several MRLs based on the lack of supervised field trials involving the analysis of the new residue definition for risk assessment and the lack of sufficient trials approximating the cGAP.	**Canada**
Procloraz – Aguacate: Es importante tener en cuenta que los resultados de la evaluación se presentan como porcentaje de la IDA y ARfD de cada compuesto. Así, los valores resaltados en la tabla superan los valores de las dosis de referencia, lo cual indica que los LMR nuevos no brindan seguridad para la población colombiana por ingesta del compuesto asociado al alimento correspondiente.	**Colombia**

COMMENT	MEMBER/OBSERVER
Prochloraz: Uruguay requests that the MRLs for citrus fruits and cereal grains not be revoked. While MRLs are recommended for certain individual cereals, no recommendation is made for rice cultivation. We therefore request that Prochloraz be considered within the Electronic Working Group on Unsupported Compounds.	**Uruguay**
On behalf of the data sponsor: For AS 3560 Rye, hay and/or straw: Suggesting deleted this row as the JMPR report does not propose this separate MRL. Rye is included in the following "AS 0081 Straw and hay of cereal grains except pseudocereals".	**CropLife International**
On behalf of the data sponsor: For GC 0653 Triticale: The STMR of 0.012mg/kg as per the JMPR report page 445 is missing. Suggesting to add to this table.	
On behalf of the data sponsor: For MO 0105 Edible offal, mammalian: JMPR report page 453 mentions an MRL of 0.04 mg/kg for the group of edible offal (mammalian). The value of 0.04 mg/kg seems to be a typo in the report and the proposed MRL of 0.4 mg/kg in this table and in table 5.31.13 in the JMPR report is correct, given that STMRs and HRs are up to 0.27 mg/kg. No change needed in the tables.	
PROPICONAZOLE (160)	
The HR and STMR values should be included. Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRL for polished rice to Step 5/8.	**Canada**
Egypt recommends postponing the adoption of the proposed Maximum Residue Limit (MRL) for propiconazole (160) in rice, taking into account the exceptionally high national consumption of rice. It is estimated that the average Egyptian consumes approximately 45–50 kg of rice per year per capita, with rice being a staple food, particularly in rural areas. This level of consumption places Egypt among the highest per-capita consumers of rice globally. The basis for this recommendation is as follows: 1. Health Considerations: Alternative fungicides could be considered that are less harmful, not classified as carcinogenic, and with shorter degradation times, in line with registered pesticides in each country. Scientific evidence suggests that long-term exposure to propiconazole may pose health risks when consumed in large quantities. 2. Food Safety: Egypt enforces legislation aimed at protecting the population from harmful residues and prioritizes consumer health. 3. Environmental Impact: Propiconazole may negatively affect soil and water quality, raising broader ecological concerns. 4. EPA Findings: The 2022 EPA report classified propiconazole as a Group C possible human carcinogen. 5. Risk Assessment: A preliminary rapid assessment indicates that the expected short-term exposure to propiconazole may exceed the toxicological reference value. Accordingly, Egypt recommends postponing the adoption of this MRL until further risk assessments are conducted and safer alternatives can be considered.	**Egypt**

COMMENT	MEMBER/OBSERVER
PYDIFLUMETOFEN (309)	
Australia supports advancement of the MRLs to Step 5/8, except for leaf lettuce where the estimated acute exposure exceeded 100% of the ARfD.	**Australia**
Canada supports the advancement of the MRLs for the listed crops to Step 5/8.	**Canada**
Thailand objects to the adoption of the recommended MRL for lettuce, leaf (VL 0483) at 30 mg/kg, as the results of the acute dietary exposure risk assessment exceeded the safety threshold (120% of the ARfD for general population, 370 % of the ARfD for children ages 1 to 6 years in China and 120 % of the ARfD for children ages 2 to 6 years in the Kingdom of the Netherlands.	**Thailand**
SPINOSAD (203)	
The cattle milk MRLs and STMR should be included. Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for mango and tea to Step 5/8.	**Canada**
TEBUCONAZOLE (189)	
Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRL for cumin seed to Step 5/8.	**Canada**
TEBUFENOZIDE (196)	
Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRLs for rice (grain, husked and polished) to Step 5/8.	**Canada**
Tebufenozida- Arroz: Es importante tener en cuenta que los resultados de la evaluación se presentan como porcentaje de la IDA y ARfD de cada compuesto. Así, los valores resaltados en la tabla superan los valores de las dosis de referencia, lo cual indica que los LMR nuevos no brindan seguridad para la población colombiana por ingesta del compuesto asociado al alimento correspondiente.	**Colombia**

COMMENT	MEMBER/OBSERVER
TETRANILIPROLE (324)	
The MRL for Barley, hay and/or straw should be 0.06 mg/kg (dw). The MRL for rice husked should be 0.02 mg/kg. The MRL for rice polished should be 0.02 mg/kg (previous MRL *0.01 mg/kg, STMPR 0.01 mg/kg). The MRL for Wheat, hay and/or straw should be 0.06 mg/kg (dw). Australia supports advancement of the MRLs to Step 5/8.	**Australia**
Canada supports the advancement of the MRL for the listed crops to Step 5/8.	**Canada**

ANNEX II

Public health concern submitted in reply to CL 2024/89-PR

(For information)

FORM FOR EXPRESSING CONCERNS WITH PUBLIC HEALTH ON A PESTICIDE FOR PRIORITISATION OF PERIODIC REVIEW

Submitted by: *The European Union*		
Date: *April 2025*		
Pesticide/Pesticide Code Number	***Food/Food Code Number***	***CXL (mg/kg)***
246 Acetamiprid	**All commodities with CXLs**	**All CXLs**
Is this a concern? *Yes*		

The concern relates to which prioritisation criterion/criteria (Specific statement of concern)

*Acetamiprid was evaluated by the JMPR in 2011, w*here an ADI of 0–0.07 mg/kg bw and an ARfD of 0.1 mg/kg bw were established and maximum residue levels were recommended for a range of commodities.

Due to the availability of new scientific information, the European Food Safety Authority (EFSA) published in January 2022 and in May 2024 statements on the toxicological properties and maximum residue levels of acetamiprid and its metabolites.

The following concerns were identified in the 2024 EFSA statement:

- *Toxicological reference values were substantially lowered. The newly proposed ADI, ARfD and (A)AOEL are set at 0.005 mg/kg bw per day.* The previous ADI, the ARfD, the AOEL and the AAOEL of acetamiprid were set in 2016 at 0.025 mg/kg bw (per day) on the basis of a rat DNT study (uncertainty factor (UF) 100). In the peer review meeting conducted in the framework of the renewal process, the experts agreed that there was a treatment related reduction of auditory startle responses in offspring from 10 mg/kg bw per day onward, resulting in a NOAEL of 2.5 mg/kg bw per day for this endpoint. Experts noted that the data do not allow for any firm conclusion, since important endpoints such as motor activity, learning and memory evaluation could not be properly assessed.

  Based on the currently available relevant and reliable evidence on acetamiprid it was concluded that acetamiprid causes nAChR activation and rapid desensitisation of the receptors in vitro. This is considered a molecular and cellular effect that could lead to an adverse outcome at organism level and represents a DNT concern. Overall, the uncertainties in the available DNT data set warranted the application of an additional UF of 5 to the HBGVs of acetamiprid.

- Additionally, the toxicological reference values for acetamiprid metabolite IM-2-1 were also lowered from 0.025 mg/kg bw per day to 0.005 mg/kg bw per day. The available evidence on IM-2-1 (major rat metabolite; large structural similarities with the parent, available 28-day rat study) does not allow to conclude on a different qualitative or quantitative toxicological profile for the metabolite. Therefore, it was agreed that the toxicological profile of IM-2-1 is considered as covered by that of acetamiprid and the same HBGVs proposed for the parent should apply to the metabolite.
- The residue definitions for risk assessment and enforcement for plant products were re-evaluated, taking into account the available metabolism data and recent monitoring data.
- The available studies investigating the metabolism of acetamiprid in plants gave an indication that the metabolite IM-2-1 is formed at relatively low levels in edible parts of fruit crops and leafy crops (between 2-8 % of the TRR; up to 0.3 mg/kg in fruits; up to 1.25 mg/kg in leafy). However, it was noted that at longer pre-harvest intervals, this metabolite occurs at higher proportions related to the parent compound, IM-2-1 representing up to 32% of the parent compound (16% of the TRR) in apple leaf. The monitoring data on the metabolite IM-2-1 confirmed its occurrence in several commodities belonging to the groups of leafy and fruit commodities. In these crop groups, the median proportion of metabolite IM-2-1 compared to the parent compound was found to be significant in fruit and leafy crops (median ratio IM-2-1/acetamiprid accounting for 21 to 44%, respectively).

A revised residue definition for risk assessment was therefore proposed for leafy and fruit crops as sum of acetamiprid and N-desmethyl-acetamiprid (IM-2-1), expressed as acetamiprid. Regarding the residue definition for enforcement, the available data did not indicate a need to modify the existing definition because acetamiprid is still a sufficient marker of the residues in all crop groups.

- Considering the new health-based guidance values and the newly derived residue definition for risk assessment, an acute risk for consumer has been identified for 38 MRLs currently in place in the EU Regulation. For certain plant commodities and animal commodities the EU MRL has been set on the basis of the Codex MRLs and therefore the JMPR evaluations were also considered. In particular, the following exceedances of the ARfD for children were identified for Codex MRLs previously implemented in the EU legislation:
    - Asparagus: 166%
    - Blackberries, raspberries, currants, gooseberries, blueberries, cranberries: 259%, 224%, 191%, 142%, 221%, 109%
    - Cherries: 260%
    - Melons, watermelons: 404%, 325%
    - Grapes: 441%
    - Broccoli, cauliflower: 300%, 367%
    - Bovine liver, bovine edible offals: 144%, 130%

  Additional commodities with CXLs not implemented in the EU legislation might be affected.
- *In view of the identified acute risks for the consumer, it is considered that a re-evaluation for toxicology and residues of acetamiprid and all its CXLs is highly necessary, and this task should be prioritized by the JMPR.*

Is supporting data being provided? *Yes*

Data/Information:

EFSA EFSA (European Food Safety Authority), 2024. Statement on the toxicological properties and maximum residue levels of acetamiprid and its metabolites. EFSA Journal 2024;22 e8759, https://doi.org/10.2903/j.efsa.2024.8759

EFSA PPR Panel (EFSA Panel on Plant Protection Products and their Residues), 2022. Statement on the active substance acetamiprid. EFSA Journal 2022;20(1):7031 71 pp.https://doi.org/10.2903/j.efsa.2022.7031

EFSA EFSA (European Food Safety Authority), 2016. Conclusion on the peer review of the pesticide risk assessment of the active substance acetamiprid. EFSA Journal 2016; 14(11):4610, 26 pp. https://doi.org/10.2903/j.efsa.2016.4610

Is this a continuing concern? *No*

Outline ongoing concern and provide supporting data