

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 Items 6.1 and 6.2

PR56/CRD10 Rev.1

September 2025

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

56th Session

Santiago, Chile

8-13 September 2025

Comments submitted by Iran (Islamic Republic of)

Agenda Item 6.1

CX/PR 25/56/5

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

Update on MRL Assignment for Clothianidin and Request for Reservation for Thiamethoxam in Pistachios (TN 0675)

1. Background

1.1. The 55th Session of the Codex Committee on Pesticide Residues (CCPR55) assigned the Islamic Republic of Iran the task of establishing a Maximum Residue Limit (MRL) for clothianidin in pistachios (TN 0675).

1.2. Since the conclusion of CCPR55, the Iranian Pesticide Regulatory Authority has implemented a significant regulatory change: clothianidin has been removed from its list of approved pesticides for use on pistachios.

1.3. While clothianidin is no longer permitted for use, its parent compound, thiamethoxam, remains an approved and widely used pesticide for pest control on pistachios in Iran. It is important to note that clothianidin is a major metabolite of thiamethoxam.

2. Rationale for the Request

2.1. The recent change in our national pesticide policy means that the original MRL assignment for clothianidin no longer aligns with our current Good Agricultural Practices (GAP). Therefore, the focus of our work should shift to thiamethoxam, as clothianidin residues are derived from its application.

2.2. To establish an MRL for thiamethoxam (which would encompass the combined residues of thiamethoxam and its metabolite, clothianidin), new supervised residue trial data reflecting current Iranian GAP are required.

2.3. The Iranian delegation is actively generating this comprehensive data. We intend to submit it for evaluation by the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) upon completion of the trials and compilation of the data.

3. Proposed Action

3.1. The Delegation of Iran respectfully requests that the Committee take note of this update regarding our national pesticide policy.

3.2. We further request the Committee to reserve the MRL for thiamethoxam (TN 0675) in pistachios. This reservation would provide Iran with the necessary time to complete the required residue trials and submit the comprehensive data to JMPR for a thorough scientific evaluation.

3.3. This proposed reservation will ensure that the future Codex MRL for this commodity is based on accurate and current scientific data, precisely reflecting the actual pesticide residues found in pistachios produced under Iranian GAP, thereby supporting the safe international trade of the commodity.

Agenda Item 6.2

CX/PR 25/56/6

CXLs for milk and milk fat

With reference to the circulated document CX/PR 25/56/6 (July 2025), we respectfully submit the following comments for consideration by CCPR:

As a general recommendation, CCPR should confirm the decisions of CCPR40 and CCPR55, while requesting the Codex Secretariat to provide:

- A clear scientific definition of “fat-soluble” pesticides;
- Standardised laboratory guidance on residue analysis in whole milk versus milk fat; and
- Improved transparency in database notes to ensure user-friendly application by national authorities.

Iran’s detailed recommendations are as follows:

1. Paras. 5–7: The proposed note applies only to fat-soluble pesticides with CXLs for both milk and milk fat. However, the criteria for “fat-soluble” classification are not clearly explained in this document. A transparent definition (e.g., based on log P values or JMPR categorisation) should be included.
2. Para. 6: There is a data gap. While Triflumezopyrim and Fluzaindolizine are noted as “not fat-soluble,” further justification (analytical or toxicological) should be provided to avoid ambiguity.
3. MRL interpretation: Since MRLs for milk and milk fat can differ, additional guidance is needed on how enforcement authorities should interpret exceedances (e.g., whether results in separated milk fat fractions are valid for regulatory action).
4. Para. 9: The rationale that solvent extraction may cause apparent residue overestimation in fat fractions is valid. However, guidance should be added on how laboratories should adapt their standard operating procedures to avoid misinterpretation.

We appreciate CCPR’s consideration of these comments.