

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 5(a) and 6.1

PR56/CRD13 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 United States of America*

### Agenda Item 5(a)

### Section 2 of the 2024 JMPR Report

#### Report on items of general consideration arising from the 2024 JMPR meeting

#### 2.1 Developments in dietary exposure methodology for pesticide residues in foods

While the United States appreciates the efforts of JMPR to explore how to advance its dietary exposure assessment methods, the United States has concerns about further advancement of JMPR's recommendations to transition from the current International Estimated Daily Intake (IEDI) methodology to the proposed Global Estimate of Chronic Dietary Exposure (GECDE) methodology.

##### *Background*

At CCPR55, the committee raised concerns about JMPR's 2023 recommendations on the adoption of the GECDE methodology to assess dietary exposure to pesticides. These concerns recognized that the selection of a dietary method is a scientific judgement but called attention to the importance of establishing a transparent evaluation process that enables Codex stakeholders to provide feedback and address CCPR's risk management considerations.

The United States' previous concerns are included in the CCPR55 Report and summarized below:

*A Member supported the JMPR's general working principles to (i) base its risk assessments on realistic exposure scenarios that consider susceptible and high-risk groups, (ii) improve the characterization of chronic risk from less than lifetime exposure, and (iii) work to harmonize JECFA and JMPR assessment methodologies. Beyond these scientific considerations, it was also critical that changes to JMPR's methodology be done transparently so that CCPR and other stakeholders understand the robustness of the proposed approach and its impact on risk management. Given that JMPR intends to further investigate the degree of conservatism in the GECDE (mean and high) in comparison with the current international estimate of dietary intake (IEDI) methodology, the Delegation believed that JMPR should coordinate more closely with CCPR to determine if it is appropriate to transition from the use of the IEDI to the use of GECDE-mean. This should be done transparently and give CCPR and other stakeholders an opportunity to provide input.<sup>1</sup>*

Other delegations expressed similar concerns about JMPR's transparency and indicated that the GECDE methodology is "understood by only a limited number of experts." These delegations indicated that "CCPR, as the risk manager, needed time to evaluate the implementation of GECDE-mean and required the calculation spreadsheets to be able to assess and review the calculations critically."

Concerns were also raised that JMPR has not provided information on the impact of the change from the IEDI to GECDE-mean and not provided sufficient information on the degree of conservatism associated with both the IEDI and GECDE-mean methodology.<sup>2</sup>

In addition to the transparency concerns raised by CCPR55, JMPR's pesticide residue experts, who are primarily responsible for performing dietary exposure assessments, expressed a dissenting opinion about the recommendations provided in Section 2.1 of the JMPR 2024 Report. The dissenting opinion from JMPR's pesticide residue experts (found

<sup>1</sup> 55th Session of CCPR (2024), Paragraph 30, REP24/PR55.

<sup>2</sup> 55th Session of CCPR (2024), Paragraph 31, REP24/PR55.

in Appendix X of the JMPR 2024 Report) raises similar concerns as CCPR55 and calls attention to the following scientific issues with JMPR's recommendations:<sup>3</sup>

- *There was disagreement that the analysis presented in Section 2.1 in response to questions raised by CCPR and JMPR 2023 was sufficient to adopt the use of the GECDE-high model.*
- *The GECDE-high methodology results in long-term exposure estimates which are significantly higher than the current IEDI model, and may result in an unrealistic overestimation of the long-term dietary risk.*
- *More detailed information is needed to clearly describe the documentation on the model, data sources, underlying assumptions, model output, and how these were applied within the GECDE model.*

#### *Risk Analysis Principles*

The Codex Alimentarius promotes the adoption of science-based food standards globally, aiming to protect consumer health and ensure fair practices in food trade. This commitment is embodied in the Codex risk analysis principles, which guide CCPR's decision-making processes. These principles emphasize that risk analysis should be:<sup>4</sup>

- a. *applied consistently;*
- b. *open, transparent, and documented;*
- c. *conducted in accordance with both the Statements of principle concerning the role of science in the Codex decision-making process and the extent to which other factors are taken into account and the Statements of principle relating to the role of food safety risk assessment (see Appendix section A1.1); and*
- d. *evaluated and reviewed as appropriate in the light of newly generated scientific data.*

If JMPR wishes to use a new methodology, then both the Codex Committee on General Principles (CCGP) and the WHO Environmental Health Criteria (EHC) 240: Principles for Risk Assessment of Chemicals in Food, which is managed by the International Programme on Chemical Safety (IPCS), and would need to be notified and agree to the change in the risk assessment principles in the Codex *Procedural Manual (PM)*.

According to the 30<sup>th</sup> edition of the *PM*, Section 4.8 that applies to CCPR and JMPR has not been updated since 2015, therefore any new methodology that JMPR wishes to undertake will require necessary updates also to the *PM*.

#### *Conclusion*

The United States believes that JMPR has been unable to address previous CCPR concerns about the "uncertainty associated with the degree of conservatism and transparency of the GECDE methodology." The United States believes that it is inappropriate to adopt at CCPR56 the recommendations provided in *Section 2.1* of the JMPR 2024 Report because JMPR has been unable to address the transparency concerns raised by CCPR55 and has provided insufficient information on the dissenting opinion provided in Annex 10 of the JMPR 2024 Report.

In order to make recommendations on whether it is appropriate to transition from the IEDI to the GECDE methodology, JMPR must first establish a stepwise, transparent, and deliberative process in consultation with CCPR to confirm that there is consensus that the change is needed, the methodology is scientifically robust, and the risk management issues are fully considered.

The United States is proposing a potential timeline below of activities to strengthen CCPR and JMPR collaboration and ensure that any changes to JMPR's dietary exposure assessment methodology fully align with the Codex risk analysis principles.

---

<sup>3</sup> JMPR 2024 Report, "Annex 10. Dissenting opinion to Section 2.1."

<sup>4</sup> Codex Alimentarius Commission (2025). Codex Alimentarius Commission Procedural Manual, Section 4 Risk Analysis, Paragraph 4.

**Proposed Timeline for CCPR and JMPR Collaborative Effort on Dietary Exposure Assessment Methods (2026-2029)**

<b>2026</b>	<b>CCPR57</b>	<ul style="list-style-type: none"> <li>• <b>Scoping:</b> JMPR Secretariats outline general approach, form a transparent working group comprising WHO and FAO experts, and assess the need for additional expertise.</li> <li>• <b>Initial Discussions:</b> CCPR and JMPR Secretariats engage in preliminary discussions on the path forward.</li> </ul>
	<b>JMPR 2026</b>	<ul style="list-style-type: none"> <li>• <b>JMPR Concept Paper:</b> Develop a paper detailing the IEDI and GECDE methodologies and rationale for potential revisions.</li> <li>• <b>Draft Benchmarking Protocol:</b> Create a protocol to compare both methodologies, including a probabilistic dietary exposure assessment using the best available data on pesticide residues and food consumption.</li> </ul>
<b>2027</b>	<b>CCPR58</b>	<ul style="list-style-type: none"> <li>• <b>Deliberation on Concept Paper and Draft Protocol:</b> Provide feedback on the draft discussion paper and proposed protocol.</li> </ul>
	<b>JMPR 2027</b>	<ul style="list-style-type: none"> <li>• <b>Refine Protocol and Perform Benchmarking:</b> Address CCPR feedback, refine the comparison protocol, and conduct a preliminary benchmarking assessment.</li> </ul>
<b>2028</b>	<b>CCPR59</b>	<ul style="list-style-type: none"> <li>• <b>Feedback on Assessment:</b> Offer feedback on the preliminary benchmarking assessment conducted by JMPR.</li> </ul>
	<b>JMPR 2028</b>	<ul style="list-style-type: none"> <li>• <b>Finalize Benchmarking and Recommendations:</b> Incorporate CCPR feedback and prepare the final discussion paper, including the complete benchmarking assessment, conclusions on the IEDI and GECDE approaches, and recommendations for changes.</li> </ul>
<b>2029</b>	<b>CCPR60</b>	<ul style="list-style-type: none"> <li>• <b>Final Deliberation:</b> Review JMPR's conclusions and recommendations, and if necessary, draft changes to Codex risk analysis principles to update JMPR's methodology.</li> </ul>
	<b>CAC52</b>	<ul style="list-style-type: none"> <li>• <b>CAC Endorsement and Implementation:</b> Approve changes to risk analysis principles and Environmental Health Criterion 240, facilitating updates to JMPR's methodology.</li> </ul>

**Agenda Item 6.1****CX/PR 25/56/5****MRLs for pesticides in food and feed (at Steps 7 and 4)**

The United States is concerned that immediate withdrawal of the Codex maximum residue limits (CXL) will disrupt trade with countries that adopt Codex standards.

In the United States, superficial (storage) scald is the most economically serious postharvest disorder of apples and pears, causing fruit to become unmarketable. Ethoxyquin is an important and effective synthetic antioxidant and is currently the only postharvest treatment available to United States pear growers to prevent scald (browning) during storage.

While the JMPR 2024 Report concluded that the submitted dossier was insufficient, no public health concerns have been identified and JMPR's analysis of 12 post-harvest spray trials of pears was consistent with the current CXL of 3 mg/kg for post-harvest application of ethoxyquin. Ethoxyquin was re-evaluated in the United States in 2019. This re-evaluation proposed no changes to the residue definition for enforcement and concluded that the existing MRL of 3 mg/kg required no revision and is harmonized with Codex and other national authorities.

Given that a public health concern has not been identified and more contemporary national human- health risk assessment information is available, the United States recommends maintaining the current CXL of 3 mg/kg and utilizing the Electronic Working Group (EWG) on Unsupported Compounds to facilitate further discussion with interested stakeholders on maintaining the current CXL and keeping ethoxyquin in the Codex system. Ethoxyquin has also been

discussed by the Codex Committee on Residues of Veterinary Drugs in Food (CCRVDF), so it may be beneficial to coordinate with CCRVDF to understand its application in the global food supply chain beyond its use to prevent scald in pears.

In conclusion, the United States recognizes the issues raised by JMPR but recommends that the current ethoxyquin CXL of 3 mg/kg be maintained to permit further discussion and deliberation through the EWG on Unsupported Compounds.