

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3, 5(a), 6.1, 6.2, 6.3, 7, 8.1, 8.2, 9, 10, 11

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ORIGINAL LANGUAGE ONLY

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

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Comments submitted by Thailand

This document consolidates all Thailand's comments previously submitted through the OCS for CL 2025/35-PR, CL 2025/38-PR, CL 2025/39-PR and CL 2025/45-PR, and includes our additional comments to Agenda Item 3, 5 (a), 6.2, 6.3, 8.2, 9 and 11.

Agenda Item 3

CX/PR 25/56/2

Matters referred to CCPR by CAC and/or other subsidiary bodies

Thailand notes the matters for information arising from CAC, CCEXEC relevant to the work of CCPR, and other subsidiary bodies. We realize the importance of the Joint FAO/WHO Expert bodies to provide scientific advice to the committees not only for the issues of ethylene oxide (EtO) and 2-chloroethanol (2-CE) but also any substance registered and used in a country especially for establishing maximum residue limit (MRL) to protect consumer's health and facilitate fair trade.

For the point of the request of CCGP34 for consideration on the proposed amendments of the *Section 4.8 Risk Analysis Principles by the Codex Committee on Pesticide Residues*, we have specific comments as follows:

- In paragraph 168, Thailand has no objection to specifying the full terms of ADI and ARfD more clearly. However, we are of the view that in case of ADI, the full technical term should be "acceptable daily intake" rather than "admissible daily intake". We notice that the term of acceptable daily intake is used under the definition of MRL which appears in the Codex Procedural Manual. Therefore, Thailand proposes revising to "estimating an ~~admissible~~ acceptable daily intake (ADI) and an acute reference dose (ARfD)"
- In paragraph 169, we are of the opinion that the proposal to add text of "environmental studies as necessary or requested by risk managers," is substantive change that beyond the assignment of CAC to address inconsistencies and superseded content. In principle, any changes in this Section should be proposed by CCPR for revision. Moreover, it should consider the need of revision along with the actual information required by JMPR.
- In paragraph 218, we are of the opinion that adding the text of "f) Table 5-Unsupported compounds" constitutes a substantive change that beyond the assignment of CAC to address inconsistencies and superseded content. Moreover, we realize that CCPR was developed this document. Thus, it should be proposed as a new work for revision by CCPR. We understand that the CCPR has already adopted an information document for the management of unsupported compounds. Additionally, we think that the separate schedules and priority lists of unsupported compounds that provide what data is available and what data is missing will be useful for Members and industries/sponsors to prepare essential data for JMPR evaluation. Nevertheless, we notice the document emphasizes on the prioritization of different cases to define the scope of the problem and to ensure that collaboration can be carried out efficiently, whereas it does not refer to Table 5-Unsupported compounds.
- In paragraph 220, referring to the proposed change "In early September of each year, the EWG Chair will issue a ~~broadcast email~~ message to Members/Observers...", Thailand is of the view that the text "broadcast email" should be retained because the email system issued by the Chair of the EWG is currently in use for requesting nominations for new pesticides, new uses of pesticides reviewed by JMPR, other evaluations and periodic reviews.
- In paragraph 246, Thailand agrees to retain the text of "The JMPR report is not always available by February as proposed by Codex Secretariat. We believe that the JMPR usually publishes their report between December and January and recognizes it needs time to prepare and check their report. However, we encourage the JMPR to set appropriate time of annual meeting as well as extraordinary meeting if necessary. Moreover, we support FAO to

provide capacity building for Members and sponsors to achieve quality and complete data and information for JMPR evaluation.

Agenda Item 5(a)

Section 2 of the 2024 JMPR Report

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

According to the 2023 JMPR meeting, which agreed to transition from the IEDI to the GECDE method for dietary exposure assessment, Thailand is of the view that the GECDE method represents a new approach to dietary exposure assessment for pesticide residues in food. Additionally, the consumption data used in GECDE method are from approximately 40 countries that may not cover most countries that produce and consume a large amount of that commodities or products. Therefore, JMPR should conduct dietary exposure assessments in parallel using both the IEDI and GECDE approaches in the meantime. We also recommend that FAO/WHO facilitate capacity building for Member countries to ensure a proper understanding of the GECDE method, and that the development of national food consumption datasets for submission to CIFOcoss database should include contributions from several Member countries.

Agenda Item 6.1

CX/PR 25/56/5

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

Firstly, Thailand appreciates JMPR for hard working. In principle, Thailand does not object the proposed MRLs for pesticides in food and feed in this agenda item with the exception of some following pesticides that have a serious public health concern based on the result of JMPR's evaluation. In addition, we strongly support the advancement of recommended MRLs for fosetyl aluminum and novaluron in rice and polished rice as proposed by JMPR due to its safety. The specific comments on certain pesticides in food and feed are as the follows:

Fipronil: 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.

Fenpyroximate: 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).

Fosetyl aluminum: Thailand strongly supports the adoption of the recommended MRLs of fosetyl aluminum in rice (GC0649) at 40 mg/kg and polished rice (CM1205) at 40 mg/kg, as the results of the dietary assessment for both chronic and acute indicate safety.

Novaluron: Thailand strongly supports the adoption of the recommended MRLs of novaluron in rice (GC0649) at 5 mg/kg and polished rice (CM1205) at 0.15 mg/kg, as the results of the dietary assessment indicate safety.

Phosmet: Thailand objects to the adoption of the recommended MRL of phosmet in blueberries (FB0020) 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.

Pydiflumetofen: Thailand objects to the adoption of the recommended MRL for lettuce, leaf (VL0483) 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).

Agenda Item 6.2

CX/PR 25/56/6

CXLs for milk and milk fat

Thailand agrees with the recommendations presented by the Codex Secretariat as follows:

1. To insert a note “for monitoring and regulatory purposes, whole milk is to be analysed, and the result compared to the MRL for whole milk” to the CXLs for milk in the Codex database in all cases where CXLs are established for fat-soluble pesticides in both milk and milk fat; and
2. To insert a note alongside the MRL for whole milk in all cases where MRLs were established for both milk fat and whole milk for fat-soluble pesticides.

Agenda Item 6.3

CX/PR 25/56/7

MRLs for okra

In principle, Thailand supports the extrapolation of Codex MRLs from Subgroup 012B Fruiting vegetables, other than cucurbits – peppers and pepper-like commodities – to okra, martynia, and roselle as these commodities are still in the subgroup. We also realize that although these commodities are minor crops they are still traded internationally and consumed in large numbers in some regions. Therefore, it is important and necessary to have MRLs as reference for production and trade that will ensure safety for consumers and be fair to both producers and traders. In addition, we encourage members and sponsors to cooperate in submitting relevant data to JMPR for evaluation especially where the extrapolation is considered inappropriate based on obtained reliable scientific information. Thus, we support the Committee and JMPR continue its efforts to find a solution in this issue.

With this regard, we would like CCPR to retain all Codex MRLs and make a plan to consider the pesticides with existing Codex MRLs for okra, martynia, and roselle on a case-by-case basis based on the periodic review schedule of each pesticide. This will help Members and sponsors to plan and prepare scientific support data. In cases where supporting data are not available, the MRLs for okra, martynia, and roselle should be then revoked from the subgroup of pepper.

Agenda Item 7

CX/PR 25/56/8

Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage (at Step 7)

General comment

First of all, Thailand appreciates the Chair of Electronic Working group, India and the Co-Chair, Canada, Islamic of Republic of Iran and Singapore for preparing the useful draft guidelines.

Thailand noted that superscripts used throughout this guideline are unclear as some superscripts refer to reference documents specified in Appendix II of CX/PR 25/56/8 which are just information, while the others are footnotes of which explanation are identified in the below paper.

Specific comments to Appendix I of CX/PR 25/56/8

- **Para 17:** Thailand would like to propose the correction of the reference document “ISO Guide⁴” to “ISO Standard⁴”.
- **Para 27:** We noted that appropriate concentration specified for detector do not cover the range of 0.5 mgL⁻¹ to 1 mgL⁻¹ and of 5 mgL⁻¹ to 10 mg/L. To improve practical clarity, we recommend setting clear criteria for these ranges.
- **Para 40:** Thailand is of the view that the calculation formula should be divided by the "mean peak area ratio of RM before expiry and IS" rather than that of RM after expiry. we noticed that all of other equations compare the deviation to the value from the RM before expiry or the new RM.

Specific comments to key discussion point

Regarding the proposal to add the storage temperature condition of RM that could be extend its shelf-life in the draft document, we are of the view that any provided information shall be based on scientific evidence and ensure that it is applicable to all RMs. Furthermore, we suggest it be clearly specified that storing RM at a temperature lower than that recommended by the RMP is a condition for unopened RMs only.

Agenda Item 8.1

CX/PR 25/56/9

Management of unsupported compounds without public health concerns scheduled for periodic review

In principle, Thailand realizes the importance on the establishment of MRL for all pesticides registered in a country, especially for import and export products to avoid problematic trade due to lack of MRLs. Therefore, Thailand support the retention of the Codex MRLs for fenthion, parathion-methyl, bitertanol, and dinocap unless there is no safety concern, while existing a national registration.

For Thailand, we have a concern about the proposal on revocation of Codex MRLs for amitraz because this substance is registered and used in our country. With this, we believe that many countries still also have it registered for use. Moreover, it does not pose any health concerns for consumers. However, we understand that the CCPR55 agreed the revocation unless scientific data could not be supported by Members and sponsors to JMPR for proposing to consider

in CCPR56. We therefore would like to propose reservation on the revocation as the above-mentioned rationales and request noting our reservation in the report.

In addition, as these substances (fenthion, parathionmethyl, bitertanal, dinocap and amitraz) do not pose adverse health effects, Thailand is of the view that the name of these substances should still be retained in the Codex pesticide database if a decision is made to revoke their Codex MRLs. This is to be understandable that the revocation is not the result of safety concern and it is still opened for setting a new MRL once availability of scientific data.

Agenda Item 8.2

CX/PR 25/56/10

National registrations of pesticides

Thailand would like to appreciate the electronic working group chaired by Chile and co-chaired by Australia, India and Kenya, and Germany, an assistant for hard working in the development of national registration database (NRD).

In principle, Thailand believe that this work 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. However, calling data from EWG might get less information and not inclusiveness since it depended on the number of participants and the level of participation. Thus, if the Committee decides to suspend the NRD-related work until it becomes necessary to specific requests for information on unsupported compounds with no public health concern, Thailand can accept with the decision. However, we also would like to recommend when it is returned to be used, more link to work on unsupported compound without public health concern should be provided. Also, more interest should be encouraged in Members to participate in providing information, especially when requested. Furthermore, since this work relates to gather the information of registration of pesticides, the process of call for data should not limit only members of EWG.

Agenda Item 9

CX/PR 25/56/11

Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR

Thailand would like to thank Australia for chairing the electronic working group and coordinating with Thailand very well in particular the confirmation of the JMPR evaluation on Azoxystrobin in Chinese broccoli and chili in 2025.

For the 2026 proposed schedule-new use and other evaluation, Thailand would like to confirm the submission of residue trial data of Chlorantraniliprole in Thai eggplant for 5 trials and in Durian for 6 trials for evaluation by JMPR in 2026.

Agenda Item 10

CX/PR 25/56/12

Enhancement of the operational procedures of CCPR and JMPR

Thailand thanks the EWG for its dedicated work and valuable contributions. Thailand agrees with the proposed short-term approach, noting that convening a special JMPR meeting would help reduce the backlog of new compound evaluations. It is therefore essential to consider appropriate ways of allocating the necessary resources to facilitate the organization of such meetings, including the recruitment of permanent JMPR staff, as proposed by CropLife International.

In addition, Thailand foresees the advantages of the proposal to recruit permanent JMPR staff to draft preliminary reports for use by JMPR experts, while emphasizing the importance of securing sufficient budgetary support and carefully considering the qualifications and expertise of the staff to be hired.

Moreover, Thailand supports the proposal to develop a guideline for data submission to JMPR, with the aim of addressing issues related to poor-quality documentation. We noted that it should be clearly determined whether such guidelines would cover the submission of Supervised Residue Trials (SRT) data or toxicology data. Moreover, since FAO has already established guidelines for the submission of SRT data for JMPR evaluations, any new guidelines intended for SRT data should be detailed, consistent with, and non-duplicative of FAO's existing guidelines.

Agenda Item 11

CX/PR 25/56/13

Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF Working Group on Compounds for Dual Use – Status of work

Thailand supports the ongoing efforts of the Joint CCPR/CCRVDF EWG under the current Terms of Reference (ToRs). Additionally, based on the challenges found, we agree with the proposed recommendation to convene a virtual Joint Working Group and virtual Joint Session of CCPR and CCRVDF. Moreover, to facilitate discussion with clear data and information and to achieve the effective outcomes and we would like to propose the participation of a representative from both JMPR and JECFA in the virtual meetings.