

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda Items 3, 5(a)

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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 Brazil*

### Agenda Item 3

CX/PR 25/56/2

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

1. Brazil wishes to provide comments on APPENDIX I of document CX/PR 25/56/2, specifically under the section **Proposed change** - The FAO Panel of Experts on Pesticide Residues in Food and the Environment considers data on registered use patterns, fate of residues, animal and plant metabolism, analytical methodology, environmental studies as necessary or requested by risk managers, and residue data derived from supervised residue trials in order to propose residue definitions and maximum residues levels for the pesticide in food and feed. **Rationale** - JMPR often looks to environmental data, e.g. in case of rotational crop studies to make use of Dt50 values.
2. **Brazil suggests the following alternative wording** - The FAO Panel of Experts on Pesticide Residues in Food and the Environment considers data on registered use patterns, fate of residues, animal and plant metabolism, analytical methodology and residue data derived from supervised residue trials in order to propose residue definitions and maximum residues levels for the pesticide in food and feed. **Environmental information, when requested, must be specifically related to rotational crop studies and soil degradation data (e.g. DT<sub>50</sub> values), may also be considered when directly relevant to understanding residue behavior in crops and only to the extent necessary to support the dietary risk assessment.**

#### Justification

This wording maintains the original mandate of the JMPR focused on dietary risk assessment, while recognizing that certain environmental information can be relevant in interpreting residue data — for example, in cases of rotational crops. The limitation “only to the extent necessary to support the dietary risk assessment” ensures that environmental considerations remain strictly supportive, avoiding the introduction of broader environmental risk criteria that could delay or complicate the establishment of Codex MRLs, thereby preserving both consumer protection and the facilitation of international trade.

The core mandate of JMPR in the context of Codex MRL establishment is to assess dietary risk and recommend MRLs based on residue levels in food and feed, using sound scientific evidence from supervised residue trials and related studies. While environmental data may provide useful context — for example, in rotational crop studies to clarify possible residue carry-over — their consideration should be limited to cases where such data are directly relevant to interpreting residue behavior in crops consumed by humans or animals.

This limitation avoids expanding the JMPR scope into broader environmental risk assessment, which could introduce non-dietary criteria into MRL recommendations, potentially delaying decisions or leading to unnecessarily restrictive MRLs. By clearly defining when and how environmental data may be used, the process remains focused on dietary safety, facilitates international harmonization, and supports science-based trade without compromising consumer protection.

**Agenda Item 5(a)****Section 2 of the 2024 JMPR Report****Report on items of general consideration arising from the 2024 JMPR meeting**

1. Brazil acknowledges the important work carried out by JMPR in advancing methodologies for dietary exposure assessment. We recognize the merit of developing new approaches, such as the Global Estimate of Chronic Dietary Exposure (GECDE), and appreciate the efforts of FAO, WHO, and the experts involved in this process. Brazil further acknowledges the relevance of appropriately considering high consumers in exposure assessments, as this contributes to strengthening consumer health protection.
2. At the same time, Brazil would like to respectfully note certain concerns regarding the current stage of development and application of the GECDE methodology, particularly the GECDE-high approach. While Brazil supports continuous scientific progress, we consider that additional reflection and dialogue are warranted before this methodology is broadly applied for regulatory purposes. Additionally, there remain important elements of uncertainty that, in our view, call for further technical clarification prior to wider implementation.
3. In particular:
  - The GECDE-high model appears to produce considerably higher long-term exposure estimates compared to the established IEDI methodology. In some cases, this may lead to an estimation of chronic dietary risk that could be overly conservative; particularly when the food is not widely consumed by the population or when only limited consumption data are available.
  - While the protection of high consumers is an important objective, there is a risk that excessively conservative outcomes could result in Maximum Residue Limits (MRLs) that are unnecessarily restrictive and may not accurately reflect realistic dietary exposure.
  - Such conservative estimates, if not carefully balanced, could also create unintended challenges for international trade, potentially affecting exporting countries without necessarily enhancing consumer protection.
  - Greater transparency is required regarding the underlying documentation of the model, including data sources, assumptions, and outputs, so that Member countries can fully evaluate the robustness and policy implications of this approach.
4. Brazil also supports that the transition to the GECDE methodology, if endorsed, should ideally follow a gradual and stepwise process. This would enable Member countries to adapt to the changes in an orderly manner, minimize potential trade disruptions, and allow for further technical refinements if required.
5. For these reasons, Brazil recommends that JMPR and CCPR proceed with caution in the adoption of the GECDE methodology, particularly the GECDE-high approach. We encourage continued technical work and inclusive consultations with Member countries to address the concerns raised. It is essential that any new methodology applied for MRL setting both safeguards consumers—including those with higher intakes—and ensures that outcomes remain science-based, proportionate, and consistent with Codex's dual mandate of protecting consumer health and facilitating fair practices in food trade.