

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

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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 India

Agenda Item 5(a)

Section 2 of the 2024 JMPR Report

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

India thanks the JMPR experts for their efforts and is of the view that based on the dissenting opinions expressed by the residue experts in Annexure 10 of JMPR Report 2024, further consideration is required for a transparent and comprehensive risk assessment before the adoption of this methodology. More deliberations are required to understand the need of transition from IEDI approach to GECDE approach, transparency concerns, unrealistic overestimation of the long-term dietary risk, documentation on the model, data sources, underlying assumptions, model output, and the impact of this transition on the Codex MRLs. Further, all regions should be adequately represented while validating the methodology.

Rationale: The transition from the present risk assessment methodology to the new approach may have a substantial impact on the present Codex MRLs leading to food safety concerns and trade barriers.

Agenda Item 6.2

CX/PR 25/56/6

CXLs for milk and milk fat

India supports the recommendation of Codex Secretariat 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”

Rationale: This principle was already deliberated and agreed upon during the 40th Session of CCPR, where the Committee endorsed the practice of analysing whole milk and comparing results to the established CXLs for whole milk. Therefore, extending this note across relevant entries in the Codex database is consistent with previous CCPR decisions.

Agenda Item 6.3

CX/PR 25/56/7

MRLs for okra

India proposes to submit relevant GAP data to evaluate the extension of the CXLs for the pepper’s subgroup (VO 0051) to okra, martynia, and roselle for evaluation by JMPR. Studies on the comparative evaluation of persistence residues of trifloxystrobin on okra and chilli, following the same Good Agricultural Practice (GAP) across different locations have already been initiated in India and ongoing residue trials are expected to generate supporting data.

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)

India supports the Guidelines for monitoring the purity and stability of reference materials and related stock solutions of pesticides during prolonged storage for recommendation of adoption at Step 8.

Rationale: These guidelines will enable the pesticide residue laboratories to overcome the shortcomings associated with Reference Materials and will enhance the monitoring of pesticide residues.

Agenda Item 8.1**CX/PR 25/56/9****Management of unsupported compounds without public health concerns scheduled for periodic review**

1. India has no objection for the revocation of all CXLs for amitraz, bitertanol, fenthion, parathion-methyl and dinocap
Rationale: In India, amitraz is not registered for use while fenthion, parathion-methyl and dinocap are banned for manufacture, import and use.
2. India has no objection for revoking CXLs for methamidophos in cottonseed, fodder beet, potato, and sugar beet as these commodities do not have corresponding CXLs for acephate.
3. India supports the retaining of all methamidophos CXLs for which there is a corresponding acephate CXL until the JMPR conducts the periodic review of acephate.
4. India supports that for compliance with MRL, methamidophos should be included in the residue definition of acephate while conducting the periodic review of acephate/ before revocation of CXLs of methamidophos

Rationale: Methamidophos is not separately registered for use. It is part of residue definition of acephate, which is a registered pesticide in India. Residues of methamidophos are taken into consideration while fixation of MRLs of acephate.

Agenda Item 8.2**CX/PR 25/56/10****National registrations of pesticides**

India is of the view that the ongoing work related to national registration of pesticides should not be discontinued.

Rationale:

- a) NRD is an important global dataset of the status of the national registration of the pesticides across the different geographies. The results of the NRD database are important inputs for risk management decisions on pesticides to ensure smooth trade of food commodities globally.
- b) Training sessions may be conducted in virtual mode for all the Codex member countries to enable the filling of the NRD excel sheet. The Codex members across all the geographies may be trained to provide relevant information on NRD to avoid regional bias.

Agenda Item 9**CX/PR 25/56/11****Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR**

India has following comments on this agenda item:

- 1) India proposes to submit the monitoring data on the following pesticide-spice combination for inclusion in the priority list of pesticides for evaluation /re-evaluation by JMPR
 - i) Imidacloprid on cumin
 - ii) Trifloxystrobin on cumin

Imidacloprid and Trifloxystrobin have approved label claim on cumin in India.

- 2) India during CCPR54 in 2023 had proposed to include Azoxystrobin on Cumin in the priority list of pesticides for evaluation /re-evaluation by JMPR. The same was included for evaluation in 2024. However, the call for data has not yet been received. The same may again be considered in the upcoming JMPR evaluation. Azoxystrobin has approved label claim on cumin in India.
- 3) As per the priority list, Metalaxyl on Cardamom is listed for JMPR evaluation in 2026. In India, metalaxyl has approved label claim for use on black pepper which belongs to the same crop subgroup as cardamom (028B Spices, fruit or berry).
- 4) India on behalf of the original registrant, BASF supports the inclusion of new molecule, Fenmezoditiaz in the Priority List 2026-for new compound evaluations for JMPR evaluation and Codex MRL fixation. As original registrant of Fenmezoditiaz, BASF undertakes to provide all the required data as per JMPR requirements.

Agenda Item 10**CX/PR 25/56/12****Enhancement of the operational procedures of CCPR and JMPR**

India supports conducting extraordinary meetings of JMPR for new use evaluations (i.e., additional MRLs of existing compounds not scheduled for periodic reviews nor complete evaluation by JMPR) will help to reduce the backlog.

Rationale: Fixing of higher number of Codex MRLs for existing pesticides on additional crops will ensure food safety and smooth trade.