

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 6.1, 7, 8.1, 8.2, 9, 10

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

56th Session

Santiago, Chile

8-13 September 2025

*Comments submitted by United Arab Emirates*

### Agenda Item 6.1

CX/PR 25/56/5

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

United Arab Emirates would like to acknowledge evaluation done by the JMPR experts leading to the recommendations of MRLs for 37 Pesticides according to the data provided by Codex members and Sponsors. The comments are as below:

##### 1- Pesticides for which Codex could not recommend MRLs:

JMPR was not able to recommend MRLs for some of the scheduled pesticides for many reasons. Some of them are related to the insufficient toxicological data or non-concluding recommendations regarding the residue definition (Carfentrazone-Ethyl (338), Chlorpyrifos (17)). In this regard, UAE suggests that Codex enhances its current procedures for data evaluation before starting the MRL setting process. The side event scheduled during CCPR56 on the 'Best practices guidance for data submitters to JMPR' will be an interesting opportunity for members and observers to look at cases of poor dossiers that could be avoided in the future.

Other evaluations were not done due to lack of time which refers to the permanent issue of JMPR backlog and the importance of looking after feasible solutions to reduce the workload. This is the case for Acynonapyr (333), Fluazinam (306), Lambda-cyhalothrin (146), Permethrin (120). As a Codex deferring country, UAE would like to highlight the importance of MRLs setting by CCPR to help the enforcement of the national legislation related to MRLs.

##### 2- Pesticides for which JMPR recommends MRLs: The comments are included in the table below.

Codex Code	Compound	United Arab Emirates comments
246	Acetamiprid	No objection to MRLs set for soya beans
228	Acibenzolar-S-methyl	UAE supports the proposed MRLs for apple (0.02 mg/kg) and of Mango (0.1 mg/kg) based on new supervised trials. UAE welcomes the withdrawn of the MRLs set based on fat and welcomes the new MRLs based on meat as a consequence of the consideration on Codex commodity Classification.
229	Azoxystrobin	UAE supports the proposed MRLs for the commodities of plant origin (avocado (1,5 mg/ kg), melon (5 mg/ kg), watermelon (5 mg/ kg), and Pineapple (2 mg /kg). UAE supports the withdrawal of the commodities of animal origin based on the re -Estimated maximum and mean dietary burdens of livestock and animal commodities maximum residue levels.
173	Buprofezin	UAE supports the recommendations of setting and withdrawing MRLs for commodities of animal origin based on the data obtained from supervised trials.
015	Chloromequat	UAE supports the recommendations of setting and withdrawing MRLs for commodities of Animal origin based on the data obtained from supervised trials.
339	Cyclobutrifluram	UAE supports the recommendation of an MRL only for banana at the LOQ (0.01 mg/Kg) due to insufficient number of the supervised trials.
239	Cyproconazole	UAE supports the MRLs recommended for the new uses of Cyproconazole on dry beans and dry peas both at (0.02 mg/Kg) as well as the MRLs set for commodities of animal origin. Based on the consideration on Codex commodity Classification, UAE welcomes the withdrawn of the MRLs set based on fat an welcomes the new MRLs based on meat.
184	Etofenprox	UAE supports the MRLs setting for rice commodities by JMPR as new evaluation based on supervised trials.
340	Fenpropidin	UAE supports the new evaluation and MRLs setting for the new compound Fenpropidin in banana, barely, wheat and processed commodities of barely as well commodities of animal origin.
193	Fenpyroximate	UAE supports the periodic review of Fenpyroximate based on Supervised trials for several commodities of plant and animal origin. UAE supports withdrawal of the MRLs for Meat (from mammals other than marine mammals) considering the new Codex Classification for animal commodities as Fenpyroximate is a fat-soluble pesticide.

Codex Code	Compound	United Arab Emirates comments
202	Fipronil	UAE supports the proposed MRLs for the different commodities of Fipronil as per its periodic review. The large number of recommended MRLs will help countries deferring to codex to align their enforcement legislation accordingly.  UAE supports the recommendation of MRLs for rice based on new Supervised trials.
341	Florpyrauxifen-benzyl	UAE supports the new recommended MRLs for the different commodities especially for rice. Rice is considered as a staple food of UAE population and is totally imported. The recommendation of MRLs for rice will lead to better harmonization in compliance procedures.
242	Flubendiamide	UAE welcomes the MRLs set by JMPR for additional uses on rice and commodities of animal origin.
342	Fluoxapiprolin	UAE welcomes the MRLs set by JMPR for Fluoxapiprolin as a new compound based on provided supervised trials.
285	Flupyradifurone	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
041	Folpet	UAE supports the proposed MRLs for the different commodities of Fipronil as per its periodic review. The large number of recommended MRLs will help countries deferring to codex to align their enforcement legislation accordingly.
302	Fosetyl-Aluminium	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
176	Hexythiazox	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
102	Maleic Hydrazide	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
147	Methoprene	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
217	Novaluron	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
301	Phosphonic acid	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials as per Fosetyl-Aluminum
103	Phosmet	UAE welcomes the periodic review of Phosmet and the recommendation of MRLs for blueberries, cranberries and potato based on supervised trials.  UAE supports the withdrawal of MRLs for some commodities due to insufficient number of trials.

Codex Code	Compound	United Arab Emirates comments
142	Prochloraz	UAE supports the periodic review of Prochloraz based on Supervised trials for several commodities of plant and animal origin. UAE supports withdrawal of the MRLs for Meat (from mammals other than marine mammals) considering the new Codex classification for animal commodities as Prochloraz is a fat-soluble pesticide.
160	Propiconazole	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
309	Pydiflumentofen	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
203	Spinosad	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
189	Tebuconazole	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
196	Tebunenozone	UAE welcomes the MRLs setting by JMPR as new evaluation for rice and commodities of animal origin based on supervised trials and consideration of commodities classification.
324	Tetraniliprole	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials and the consequent re-calculation of dietary burdens.

**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)**

The United Arab Emirates (UAE) would like to thank the Electronic Working Group (EWG) on developing the Guidelines for monitoring the purity and stability of reference materials and related stock solutions of pesticides during prolonged storage.

**Please find below our general comments. The technical comments are included in CX/PR 25/56/8-Add.1.**

**1-General comments**

UAE believes that the proposed guidelines are well aligned with our objectives concerning the extension of the shelf-life of pesticide reference materials and help to provide a practical framework for analyzing the stability and purity of reference materials beyond their expiry dates. These guidelines offer practical solutions to address challenges such as limited shelf life and the high recurring cost of pesticide standards.

Laboratories in UAE already implement the described approaches as follows:

Following the Approach 1: Comparing the stability of old (expired) and new (unexpired) pesticide reference standards as described in the guidelines over the past several years as part of our internal quality procedures. Specifically, laboratories do compare the peak areas of expired and fresh neat reference materials to monitor the percentage deviation.

Adhering to the general procurement and usage criteria for pesticide reference materials as outlined in the “General Criteria” part of the guidelines.

Verifying the purity of reference materials when stored under the conditions specified by the material provider. According to the new guidelines, lowering the storage temperature may potentially extend the shelf-life. We recognize this as an area that warrants further investigation and will be evaluating its feasibility within our laboratory setup.

Including the Approach 3 for monitoring mixtures strengthens the comprehensiveness of the document and serves the needs of laboratories that utilize multi-component standard solutions.

**2- Technical Comments**

Please see CX/PR 25/56/8-Add.1.

**3- Conclusion**

UAE recommends the adoption of these guidelines at Step 8 during the upcoming session of the Codex Alimentarius Commission (CAC48), given their positive impact on improving monitoring efficiency and promoting sustainability in pesticide residue analysis programs.

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

As per the updates provided by the document CX/PR 25/56/9 and recalling its position in response to CL 2024-46-PR, United Arab Emirates would like to emphasize that the revocation of CXLs will have consequences to trade as many countries differ to Codex in applying their compliance procedures especially if the considered reasons of revocation do not deal only with health concern as per Bitertanol (144).

- The revocation of CXLs for Dinocap (87) will lead to the deletion of CXLs for Methyl-dinocap (244) as MRLs for Methyl-dinocap were set based on studies related to Dinocap.
- The same situation is visible for Methamidophos (100) which is a metabolite of Acephate (95), thus the revocation of CXLs for Methamidophos will generate issues for Acephate (95) since the estimation of exposure may be influenced if the calculation of intake doesn't consider the Methamidophos (100) as a metabolite of Acephate (95).
- Based on the updates given in the reference document CX/PR 25/56/9, under the management approach for internal use and according to the established Priority Lists, no support were received for fenthion (39), Parathionmethyl (59), dinocap (87), Methamidophos (100), amitraz (122), and bitertanol (144).

Those pesticides will be revoked by CCPR56.

- On National Level, Fenthion (39), Parathion-methyl (59), Amitraz (122), Dinocap (87) and Methamidophos (100) these pesticides are banned for use in United Arab Emirates and consequently no data could be provided to support their periodic evaluation.

Finally, United Arab Emirates renews its support to CCPR efforts in setting a work process for the management of unsupported compounds without public health concern scheduled for periodic review.

## Agenda Item 8.2

CX/PR 25/56/10

### National registrations of pesticides

The United Arab Emirates (UAE) would like to thank the Electronic Working Group (EWG) on for Management of Unsupported compounds without public health concerns for the preparation of CL 2025/40-PR and the Discussion Paper CX/PR 25/56/10.

UAE would like to comment on CL 2025/40-PR as follows:

#### (i) To suspend the NRD-related work until it becomes necessary to support specific requests for information on unsupported compounds with no public health concern,

While considering that the National Registration Database (NRD) is an efficient tool that helps CCPR to decide about the periodic review of the unsupported compounds, United Arab Emirates (UAE) suggests to currently suspend the NRD-related work until it becomes necessary to support specific requests for information on unsupported compounds with no public health concern. Some of the reasons are:

- a. The low response rate (only 11 of 27 EWG members) and regional imbalance, as noted in CX/PR 25/56/10, that compromises the NRD's representativeness and utility. It is to mention that UAE actively participated actively in the work on National Registration of Pesticides by responding to Circular letters: CL 2023/25-PR, CL 2023/86-PR and CL 2024/46-PR.
- b. UAE agrees that resources should be allocated more effectively, focusing on ad hoc reviews when there are specific requests related to unsupported compounds without public health concerns.
- c. This approach is consistent with a risk-based prioritization model and helps reduce regulatory burden on Codex Members.

#### (ii) Request views from Codex members on any other suggestions regarding management of the NRD in the future.

United Arab Emirates suggests that Codex coordinates workshops to provide more insight on the requirements of the NRD for members which will have positive impact on the quality of data provided by member countries.

1. Input from Regional CODEX Committees: Encourage establishment of regional NRD coordination through the Codex Regional Committees to aggregate data before submission to the EWG.
2. Creation of Simplified Submission Interface: Consider transitioning from Excel-based templates to web-based forms or portals with dynamic support, which could improve user experience and data quality.
3. Capacity Building: Provide technical training and multilingual guidance for Codex contact points to encourage broader participation, especially in underrepresented regions.
4. Ad Hoc Activation of the NRD: Support the concept of activating NRD data collection only in response to specific Codex needs, such as evaluations of unsupported compounds with no public health concerns. This targeted, demand-driven approach would help avoid unnecessary data requests and reduce member fatigue.

## Agenda Item 9

CX/PR 25/56/11

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

The United Arab Emirates (UAE) would like to thank the Electronic Working Group (EWG) on Priorities chaired by Australia for the preparation of CL 2025/44-PR and the appendix A, as well as the work done to incorporate the requests and updates from members and sponsors. UAE would like to comment on CL 2025/ 44-PR as follows:

#### A. Schedules and Priority Lists for 2025:

Paragraph 3. UAE notes that schedules and Priority Lists for 2025 are closed and provided for reference only.

## B. Work Process

As member of the EWG, UAE acknowledges the work being undertaken by the chair of the EWG, noting that the platform allows a smooth follow up of the updates on the Priority Lists especially the submission of proof of registration by sponsors.

## C. Finalizing the proposed schedules for 2026

UAE noted that the number of new compounds for 2026 is lower than that of 2025 2:6, which offers the opportunity for evaluations of more new uses and other evaluations depending on data submission.

UAE welcomes the evaluation of Fenmezoditiaz on rice which will support the national work on risk assessment for this compound. For pesticides with only one-use request, UAE encourages sponsors to submit more than one use to maximize the number of uses within one petition.

For the periodic Review of 2026, UAE supports the deletion of pesticides for which the data package is not available.

## D. Priority Lists 2027 and Beyond

### Table 1

Noting that there were no nominations for new compounds until currently, the UAE wishes that sponsors could submit requests for MRLs setting to support members that are deferring to codex in their national enforcement regulation.

### Table 2A

UAE highlights the importance of the work being undertook on National Registration Database (NRD). Setting MRLs for some of the pesticides included in Table 2A based on the results of NRD is very crucial for importing and exporting countries since those pesticides are of a widely used and considered as effective means of pest control.

### Table 2B

UAE noted that the number of pesticides candidates to periodic review (meeting 15-year rule) is quite extensive. UAE acknowledges the work being conducted on the National Registration Database and hopes that this initiative will encourage sponsors and member countries to provide advice on supporting data packages and/or indication of support that would allow a triage and prioritization of the listed.

Many of the compounds in Table 2B are subject to detection in exported consignments (Methoxyfenozide, Pyraclostrobin, Trifloxystrobin....), recommending MRLs for those pesticides will help the authorities to apply to the best the compliance regulations.

## G. Public Health Concerns

UAE is in favour of deleting compounds from the CCPR pesticides list that are no longer supported by a sponsor and for which a public health concern has been identified. The withdrawal of the corresponding CXLs will reduce the number of substances for which a periodic review is needed. There are no compounds in the CCPR Pesticide List, or in Tables 2A and 2B, for which UAE would like to lodge a public health concern.

## Agenda Item 10

CX/PR 25/56/12

### Enhancement of the operational procedures of CCPR and JMPR

United Arab Emirates recognizes the efforts done by the Enhancement -EWG and the summarized updates it provided within the reference document CX/PR 25/56/12.

United Arab Emirates agrees with the short-term proposals as per appendices 1 and 2 of the cited document.

1- Convene an extraordinary meeting of JMPR to reduce the backlog of new use evaluations: UAE agrees with this option providing that the financial needs will be identified at the earliest possible. It is very important to allocate a specific task to that meeting as per focusing on the evaluations of new compounds to reduce the backlog of the new requested evaluations.

2- Complete a targeted project that improves JMPR's evaluation process: UAE highly supports the introduction of artificial intelligence within the work of JMPR/CCPR mainly in data selection and evaluation in the context of a comprehensive project dealing with the basis of electronic data submission and data quality standards.

### Other Suggested Solutions

UAE suggests that CCPR develops a shared secure data repository similar to OECD or IUCLID or EFSA Open FoodTox where sponsors upload dossiers in standardized electronic formats accessible to JMPR experts.