

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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

56th Session

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Comments submitted by Australia

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

At CCPR55 in 2024, Australia made an intervention expressing that thoughts of adopting the methodology are premature and requested that the JMPR provide more information about the traceability and transparency of the GECDE-mean and GECDE-high methodology. Information about the degree of conservatism associated with both the IEDI and GECDE-mean methodology was also requested to allow for an informed consideration of the level of protection associated with each methodology and the need to change methodologies to ensure consumer safety. Other interventions captured at paragraphs 30-35 of REP24/PR55 also requested more information about the GECDE methodology and the potential transition process and timeline.

Australia appreciates the additional information on the GECDE methodology that has been provided in Section 2.1 with the SAS code also provided at Annex 6 of the 2024 JMPR report but considers that all the requests for additional information have not yet been addressed, particularly with regards to the GECDE-high model and the potential transition process and timeline.

The 2024 JMPR report presented an analysis of the degree of conservatism in the GECDE, the influence of the number of survey days and a further consideration of the IEDI. The report concluded that the evaluation has shown good concordance between the GECDE and estimates of dietary exposure derived using food consumption data for individuals, for both the GECDE-mean and GECDE-high and that the degree of overestimation in estimates of dietary exposure based on two days of food consumption data was relatively modest, compared to estimates based on longer survey durations. While Australia considers that this analysis is a good start, it was restricted to three compounds and three national diets. Further validation in a wider range of compounds with CXLs with a wider range of foods (including less frequently consumed foods) would be beneficial. While the report considered that the degree of overestimation is modest, any over estimation could impact on if a CXL should be established and therefore further work is considered necessary to minimise unnecessary overestimation.

At CCPR55 in 2024, the JMPR secretariate '*noted that the choice of the methodology was a scientific decision that lay with JMPR, while the choice on the level of protection was a management decision that lay with CCPR. Hence, the Committee could set an acceptable level of protection and make a risk management decision based on the agreed protection goal* (paragraph 40, REP24/PR55)'. Dietary exposure estimates form an important part of the process for setting CXLs and are used as decision making tools so should reflect the acceptable level of protection (ALOP) determined by CCPR. Based on the available information about the GECDE-high methodology, it appears to represent a significant change in ALOP and the decision to implement this new methodology into the risk management decision making process at CCPR should be thoroughly considered by CCPR and be supported by evidence that a change to this methodology is necessary to achieve the ALOP agreed by CCPR.

The Risk Analysis Principles (Paragraphs 200 – 207), the 'Manual on the Submission and Evaluation of Pesticide Residue Data' (2016) and the 'Training Manual on Evaluation of Pesticides Data for the Estimation of MRLs in Food and Feed' (2012) manual all currently reference the IEDI methodology as the method for assessing chronic risk of pesticides. Should CCPR and JMPR support the transition, these documents should be updated prior to the transition so that the JMPR risk assessment process is consistent with the codex procedural manual and published guidance documentation.

It is noted national risk assessment processes are often based on codex processes which can be beneficial from a harmonisation perspective and that the GECDE-high model is not currently used by any major pesticide regulator.

Paragraph 172 of the Risk Analysis Principles in the Codex Procedural Manual states the “CCPR and JMPR should ensure that their respective contributions to the risk analysis process result in outputs that are scientifically based, fully transparent, thoroughly documented and available in a timely manner to Members.” At this time, Australia does not consider that there is sufficient transparency and documentation for the GECDE-mean and GECDE-high methodologies to be relied upon as part of the CXL setting process for pesticide residues.

Due to the need for transparency, Australia considers that the JMPR should not transition to the GECDE model until CCPR has had sufficient information and time to fully understand the GECDE-mean and GECDE-high methodologies and their implementation timelines. It is also considered important to understand the level of protection and conservatism associated with the current IEDI methodology and the GECDE-mean and GECDE-high methodologies when used for dietary exposure assessments of pesticides. Supervised Trial Median Residue (STMR) values are used in chronic dietary exposure assessments of pesticides but may be conservative when compared to real-life exposures, particularly for less frequently produced foods, processed foods or foods that are bulked and blended. Benchmarking of exposure model predictions (IEDI, GECDE-mean and GECDE-high) with post-registration monitoring data could help clarify the level of protection and conservatism associated with each methodology.

Agenda Item 6.1

CX/PR 25/56/5

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

General Matters relating to the Codex CXL database

Australia notes and appreciates that since CCPR55 in 2024, the following documents have been updated to reflect changes to the commodity classifications and representative crops which had been agreed by the committee:

- 1) CXA 4-1989 ‘Codex Classification of Foods and Feeds’
- 2) CXG 84-2012 ‘Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Groups’

Australia however requests an update on the important work to identify and make changes to the CXL database to reflect the changes that have been made to the ‘Codex Classification of Foods and Feeds’.

Australia notes that there are inconsistencies with the commodity list in the Codex CXL database, for example sweet corn (corn on the cob) and corn kernels are listed as both fruiting vegetables and cereal grains and Broccoli, Chinese remains listed as a Brassica vegetable instead of its revised classification as a leafy vegetable. Australia is concerned that such inconsistencies are emerging because the tasks required to fully implement the revised Codex Classification have not yet been implemented.

Australia also notes that at CCPR52 in 2021, agenda item 7.6 (7.f) presented the Impact of the revised types in Class A on CXLs in the database for CXLs for pesticides in food and feed. CX/PR 21/52/11 presented an analysis prepared by a consultant that was divided into two parts. Part I presented information on consequential amendments to Class A commodities for endorsement as the amendments were straight forward. Part II presented information that required further discussion for Type 2 Vegetables and Type 4 Nuts, seeds and saps. REP21/PR noted that a brief presentation was provided to CCPR52 but that a ‘Circular Letter (CL) would be distributed requesting comments on the issues raised in the document, in particular Part II which may require advice from CCPR before implementation’. A circular letter was never distributed after CCPR52 in 2021 and Australia considers that it is important that this work is progressed.