

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda items 5(a), 6.3, 9

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

Fifty-sixth Session

Santiago, Chile

8-13 September 2025

*Comments of Global Pulse Confederation*

#### Agenda Item 5(a)

#### Section 2 of the 2024 JMPR Report

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

The Global Pulse Confederation, working collaboratively with the Minor Use Foundation, appreciates the JMPR for their thoughtful consideration and further advice of the extrapolation proposals from Tomato and Pepper to subgroup Eggplants presented to CCPR55. We are very pleased to highlight JMPR's support for the establishment of Codex MRLs through extrapolation on page 31 of the 2024 report, which stated "*the meeting agreed that it provided an efficient approach to evaluate potential extrapolations from existing CXLs to additional commodities. The meeting encourages continued exploration of similar opportunities...*"

The MUF will take into consideration when preparing such proposals the advice of JMPR as contained in JMPR2024 report. The MUF lodged six of those compounds as scheduled for review by JMPR2025.

We would like to contextualize the importance of Codex MRLs for minor crops that are essential for global nutrition and food security, and face disproportionate challenges in international trade due to lack of standards and misaligned/disharmonized standards. The World Health Organization estimates that a lack of adequate consumption of fruits and vegetables were directly attributable to over 3.9 million deaths in 2017. Unfortunately, these commodities often do not have adequate access to modern crop protection technologies which can substantially reduce production levels of these important crops due to pest and disease pressures, or lead to off-label uses which may not be recommended or appropriate. As a result, the Global Pulse Confederation, through the Minor Use Foundation, would like to highlight the urgency and importance to food security and global nutrition of setting MRLs. We consider utilization of the Codex Principles and Guidance on the Selection of Representative Commodities for the extrapolation of MRLs is an efficient in enhancing Codex MRLs in minor crops.

We also note that JMPR stated, "*even if such submissions provide an efficiency gain, their evaluation requires the time of JMPR experts (approximately one evaluation of additional MRLs) that would otherwise be allocated to other JMPR work.*" Acknowledging resource and competing demands at this time our approach is to only focus on compounds scheduled for other purposes. We would however welcome discussion and suggestions at the CCPR56 meeting to explore ways to make submissions for MRLs by extrapolation for the benefit of minor uses without burdening current resource limitations.

#### Agenda Item 6.3

CX/PR 25/56/7

##### MRLs for okra

The Global Pulse Confederation, in collaboration with the Minor Use Foundation, thanks the CCPR Secretariat for CX/PR 25/56/7 pursuant to Agenda Item 6.3 on "MRLs for okra." We would like to provide the following comments:

We would like to recall the update that was provided to CCPR55 on the topic of data generation for okra. The MUF outlined that three compounds had been identified and work was in planning stages seeking feedback on study design. Prior to CCPR55 the MUF updated and sought comment from CCPR and JMPR as included in the latter attached in Appendix I.

Since that time, the Minor Use Foundation has partnered with Ghana, Senegal, Kenya, and Honduras and commenced field trials. We would like to provide the following updates on the status of field trials for one compound:

- Ghana: field trial completed, samples awaiting analysis in lab
- Honduras: field trial underway
- Kenya: to be commenced
- Senegal: field trial completed, samples awaiting analysis in lab

We anticipate these studies being completed in 2026. Submission to JMPR following their advice, requires a registered product label and inclusion on the priority schedule for review. We anticipate product registration following data generation may take between 12-24 months and thereafter would seek inclusion on the priority schedule.

We would like to note that funding for these studies has been a challenge. While we had initially received some interest in supporting data generation from some companies and a member country, funding priorities for those organizations have changed and this has delayed progress and reduced capacity at this time to a single compound.

We would like to acknowledge IAEA, who has committed to supporting the lab analysis in Ghana and Senegal and to supporting the trial work in Kenya as well, and the United States who has been supporting our trial in Honduras. We would like to acknowledge the governments of Ghana, Senegal, Kenya, and Honduras as well who have made substantial in-kind commitments of time, energy, and expertise to generate this data in support of okra growers in their respective countries. We also appreciate members of CropLife International for engaging in discussions with us BASF who has collaborated with us in the execution of this study, investing in-kind resources as well that have been invaluable to the data generation. Finally, we would like to request that any members or organizations present here who have resources available to support the completion of these studies please contact the Minor Use Foundation as we are still needing more resources to complete this study.

#### Agenda Item 9

CX/PR 25/56/11

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

The Global Pulse Confederation, in collaboration with the Minor Use Foundation, would like to note that we plan to submit the following proposals for extrapolation in 2026, in alignment with the 2026 JMPR schedule:

Current CXLs				Possible extrapolation - proposed change			
Compound	Commodity	Codex Code	MRL	Commodity group	Commodity group name	Codex Code	MRL
Trifloxystrobin	Bean (dry)	VD 0071	0.01	Subgroup 15A	Subgroup of Dry beans (excluding Soya bean, dry)	VD 2065	0.01
	Peas (dry)	VD 0072	0.01	Subgroup 15B	Subgroup of Dry peas	VD 2066	0.01
	Lentil (dry)	VD 0533	0.01				
Flupyradifurone	Bean (dry)	VD 0071	0.4	Subgroup 15A	Subgroup of Dry beans (excluding Soya bean, dry)	VD 2065	0.4
	Peas (dry)	VD 0072	3	Subgroup 15B	Subgroup of Dry peas	VD 2066	3
Sulfoxaflor	Bean (dry)	VD 0071	0.3	Subgroup 15A	Subgroup of Dry beans (excluding Soya bean, dry)	VD 2065	0.3
Acetochlor	Broad bean (dry)	VD 0523	0.15	Subgroup 15A	Subgroup of Dry beans	VD 2065	0.15

	Lupin (dry)	VD 0545	0.15		(excluding Soya bean, dry)		
	Chickpea (dry)	VD 0524	0.15	Subgroup 15B	Subgroup of Dry peas	VD 2066	0.15
	Lentil (dry)	VD 0533	0.15				
	Pigeon pea (dry)	VD 0537	0.15				
	Peas (dry)	VD 0072	0.02				

Appendix I**CCPR Update dated April 1, 2024**

**SUBJECT:** Establishment of MRLs for pesticides for okra, classification, and data generation

Dear CCPR Secretariat,

On behalf of the Minor Use Foundation Inc. (MUF) I would like to provide an update and seek your advice regarding several of our activities related to CCPR.

Hopefully you have already received our application seeking observer status at CCPR through the U.S. Codex Office.

The MUF would like to provide an update on two activities that we agreed to pursue coming out of CCPR54 as follows:

1. The generation of data on okra to facilitate further consideration by JMPR and CCPR on its appropriate placement in the crop group *Fruiting vegetables (excluding cucurbits)*. Paras 49-53 of CCPR54.

Following CCPR54 the MUF approached registrants that had compounds with commodity uses in the crop group *Fruiting vegetables (excluding cucurbits)* scheduled for future review by JMPR. While discussions with registrants are ongoing we are pleased to advise that the identification of suitable candidates is receiving promising support. As we continue these discussions we are also starting planning of the scope and commencement of these trials, hopefully in 2024-2025. We would be pleased to provide an update at CCPR55 as to our progress with these efforts, and seek the Secretariat's advice if this should be via a CRD and/or verbal update.

At this time however, we would appreciate the assistance and guidance of CCPR to ensure that the conduct of any trials will meet with the requirements of JMPR and CCPR. In this regard we would like to share some of our thoughts and in doing so seek input from CCPR. We have included in Attachment 1 a list of topics/questions and our current thoughts and would welcome the assistance of CCPR in clarifying these.

2. The development of a *Discussion paper on an analysis of previous decisions by CCPR to establish MRLs for tomato and pepper and to present a proposal to CCPR55 to establish corresponding MRLs in eggplant (discussion paper)*. Paras 207-208.

Following CCPR we have conducted an analysis of existing Codex MRLs for both the Tomato (subgroup) 12A and Pepper (subgroup) 12B, that do not have a corresponding MRL in the Eggplant (subgroup 12C). We are pleased to advise that we believe there are several candidate compounds that we will be seeking consideration of at CCPR55. We have been in correspondence recently with the CCPR Secretariat and are seeking to submit the discussion paper in early April. We will continue to liaise with the CCPR Secretariat regarding this item on the agenda for CCPR55. At the suggestion of the secretariat we are also available should it be considered beneficial to conduct a pre-virtual meeting in the weeks prior to CCPR55 to allow interested members and observers of CCPR to pre-digest the paper and facilitate discussion and decision-making in plenary.

Thank you for your kind consideration.

Best Regards,



Anna Gore

Executive Director

Minor Use Foundation

**Attachment 1**

The table below summarises the residue trials to be carried out. For each chemical five trials with the same GAP in both okra and chili peppers will be conducted considering harvest on day zero immediately post application, with at least one trial being a decline trial. We would expect the completion of said data in a period of 3 years.

Project	Crop	Region	Type of production	Number of trials
Chemical 1	Okra (VO 0442)	Africa	Outdoor	4 (Ghana, Kenya and Senegal)
		Latin America	Outdoor	1 (Honduras)
	Peppers chili (VO 0444)	Africa	Outdoor	4 (Ghana, Kenya and Senegal)
		Latin America	Outdoor	1 (Honduras)
Chemical 2	Okra (VO 0442)	Africa	Outdoor	4 (Ghana, Kenya and Senegal)
		Latin America	Outdoor	1 (Honduras)
	Peppers chili (VO 0444)	Africa	Outdoor	4 (Ghana, Kenya and Senegal)
		Latin America	Outdoor	1 (Honduras)
Chemical 3	Okra (VO 0442)	North America	Greenhouse	5 (USA)
	Peppers chili (VO 0444)	North America Latin America	Greenhouse	5 (USA)

Due to the extensive collaborative effort involved in conducting these studies for participating CCPR members and observers, we would like to receive feedback on the proposed plan, in particular:

- 1. Number of trials per crop.** The MUF has proposed 5 trials in each in accordance with guidance of the Codex Procedural Manual for Category 3 minor crops. Are there any situations where fewer trials may be sufficient?
- 2. Analysis of residues at day zero.** The MUF has proposed to conduct analysis for residues at day zero (apart from a single decline trial for each chemical mentioned below). Is this adequate?
- 3. Number of required decline trials.** The MUF is proposing to conduct one decline trial for each chemical. Is this sufficient and what sampling intervals would be appropriate (0, 1, 3, 7 and 14 days post application?)
- 4. Regions / Locations.** For those trials to be conducted in Africa (above) one of those countries will perform two trials. Are there any issues that the MUF might need to take into consideration with respect to these proposed locations?
- 5. Data submission & registered label requirement.**

5.1 The MUF would like to propose that as the data is being generated to inform further scientific consideration for members of the Pepper (subgroup) that the data when available may be submitted with or without a corresponding label. Is this acceptable?

5.2 Is there a preference for either single or joint submissions of the data for these three chemicals? For example some options could involve making submissions: • where practical alongside other submissions already on the JMPR scheduled for the chemical (by others such as the registrant) ,

- as a single package for each chemical when the data and final reports are available for each, or
- as a consolidated package involving each of the three chemicals at the completion of all studies and final report preparation.

The MUF would welcome advice and guidance on the preferred submission including those listed above or other suggestions. The MUF could also continue to keep CCPR advised of progress and subject to further discussions determine this aspect in due course and as studies are scheduled and completed as circumstances at the time may change.

5.3 To whom does the MUF submit the data (CCPR or JMPR) and what prior notification is required. The MUF would be grateful for your advice and guidance in this area.

6. **Other feedback.** The MUF would appreciate any other feedback or advice that the MUF should take into consideration when performing these studies.