

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 5(a)

PR56/CRD30

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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 Japan

Agenda Item 5(a)

Section 2 of the 2024 JMPR Report

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

Japan's Comments to Section 2.1 Regarding "GECDE Methodology" in the 2024 JMPR Report (Agenda Item 5(a))

Japan appreciates the dedicated work of the JMPR. Regarding the methodology of GECDE, presented in Section 2.1 of the general considerations in the 2024 JMPR report, we would like to express our opinion as follows.

1. The basis of our opinion (Background)

We have noted that Annex 10 of the report includes a dissenting opinion by the pesticide residue experts, members of the FAO Panel, concerning Section 2.1 of the report.

The dissenting opinion explicitly states the following key concerns:

- The justification for the adoption of use of the GECDE-high model is insufficient;
- The GECDE-high model results in an unrealistic overestimation of the long-term dietary risk;
- Further sharing of detailed information on the GECDE model is required.

2. Our primary opinion (Request for clarification to Codex Secretariat)

(1) How should we address the description included in Section 2.1 ?

Given that the dissenting opinion may significantly affect the discussion at the 56th Session of CCPR, Japan would like to request clarification from the Codex Secretariat as to whether the recommendations in Section 2.1 of the 2024 JMPR report are considered formally adopted recommendations of the JMPR.

(2) What are the prerequisites for the CCPR 56 discussion?

When the content of Section 2.1 should be treated as formal JMPR recommendations and be subject to CCPR discussion, Japan would like to express the following concerns and views.

3. Japan's Comments

(1) Regarding JMPR's response to CCPR 55's request

At the 55th CCPR Session, several delegations noted that the GECDE model is understood by only a limited number of experts. To ensure the model's appropriateness for risk management purposes, it was emphasized that the methodology must be transparently described and that the supporting tool -such as a spreadsheet necessary for replicating the calculations should be made available (REP24/PR55, Para.31). However, the 2024 JMPR report does not provide sufficient detail of the methodology of the GECDE model. The report merely states that spreadsheet development requires significant time and effort.

Therefore, Japan requests that JMPR provide a thorough response to CCPR 55's request once again.

(2) Detailed impact analysis of the transition to GECDE from IEDI

As raised by some Members during the previous session, the justification for replacing IEDI with GECDE is not adequately explained. Moreover, the impact assessment of this transition was examined using only three pesticides as

examples, which is extremely limited in scope. Similar to the previous discussion on the changes in the IESTI methodology, a comprehensive impact assessment of all existing CXLs should be conducted.

(3) The most important aspect for the transition from risk management viewpoints.

Notably, the 49th CCPR Session concluded that changes to the IESTI methodology could result in the revocation of several existing CXLs (CX/PR 49/17/12). If the adoption of GECDE model also indicates potential revocation of CXLs, this could seriously affect international trade.

4. Japan's Position

The 2024 JMPR report recommends replacing IEDI with GECDE and discontinuing of use of IEDI. However, without a comprehensive impact assessment on existing CXLs, it is impossible to make management decisions, i.e., retention or exclusion of IEDI. Existing CXLs were established based on IEDI, and there have been no reports of adverse health effect associated with these levels to date to our knowledge. Thus, we believe that the IEDI-based assessment achieved a sufficient and suitable level of consumer health protection.

Japan acknowledges that using individual dietary consumption data can provide more realistic exposure estimates compared to cluster diets. Therefore, Japan is open to a stepwise transition to the GECDE-mean model, provided that:

- detailed documentation of the methodology is disclosed, and
- tools such as spreadsheets are made available to allow validation of the exposure model and risk management evaluation by each member.