

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 8.1

CX/PR 25/56/9-Add.1

September 2025

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Fifty-sixth Session

Santiago, Chile

8 - 13 September 2025

MANAGEMENT OF UNSUPPORTED COMPOUNDS WITHOUT PUBLIC HEALTH CONCERNS SCHEDULED FOR PERIODIC REVIEW

Comments in reply to CL 2025/39-PR

submitted by

Brazil, Canada, Chile, Egypt, European Union, Ghana, India, Indonesia, Iran (Islamic Republic of), Thailand, Uruguay

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/39-PR¹ issued in July 2025. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

ANNEX**GENERAL COMMENTS**

COMMENT	MEMBER/OBSERVER
<p>Brazil would like to thank the Chair, Chile, and the Co-Chairs - Australia, Ecuador, Kenya, and India - for their dedicated work in preparing document CX/PR 25/56/9 and for facilitating constructive discussions on this important matter.</p> <p>After reviewing the document and considering the issues discussed, Brazil expresses its agreement with the conclusions and recommendations set out in paragraph 26 of CX/PR 25/56/9.</p> <p>We remain committed to actively contributing to the work of the Codex Committee on Pesticide Residues (CCPR) and to supporting science-based decisions that promote fair trade and protect consumer health.</p>	Brazil
<p>La delegación de Chile agradece el trabajo realizado por el grupo de trabajo por medios electrónicos, y apoya recomendaciones presentadas en el párrafo 26 (i), (ii), (iii) y (iv) del documento del programa CX/PR 25/56/9, es decir:</p> <p>(i) Revocar todos los CXL de fentión (39), paration-metilo (59), dinocap (87), amitraz (122) y bitertanol (144). CXL de metamidofos (100)</p> <p>(ii) Revocar los CXL de metamidofos (100) en semillas de algodón, forraje seco de remolacha, patatas (papas) y azúcar, ya que estos productos no tienen CXL correspondientes de acefato (95).</p> <p>(iii) Retener todos los CXL de metamidofos para los cuales hay un CXL de acefato correspondiente, hasta que la JMPR realice la revisión periódica de acefato (95)</p> <p>(iv) Recomendar que la JMPR revise la definición de residuo de acefato (95) para incluir metamidofos (100), al realizar la revisión periódica de acefato</p>	Chile
<p>Egypt appreciates the work which done in the document & agrees with the following recommendations , noting that the pesticides proposed for discontinuation are already no longer in use in Egypt.</p>	Egypt
<p>The European Union (EU) would like to thank the Electronic Working Group (eWG) on management of unsupported compounds without public health concerns scheduled for periodic review by JMPR, chaired by Chile and co-chaired by Ecuador, Australia and Kenya for the preparation of the recommendations.</p> <p>The EU supports the recommendations proposed in the circular letter, which are consistent with the recommendations made at the previous meeting.</p>	European Union
<p>General Position</p> <p>Iran supports the principle of the management approach endorsed by CCPR, namely that where no data package is submitted after a request, Codex Maximum Residue Limits (CXLs) should be recommended for revocation. This ensures efficiency in the review process and maintains Codex's credibility.</p>	Iran (Islamic Republic of)

COMMENT	MEMBER/OBSERVER
<p>Trade Considerations</p> <p>Iran notes the analysis presented by Brazil indicating that revoking unsupported CXLs, particularly for methamidophos, is unlikely to cause major trade disruptions for acephate-treated crops. This reassures Members that Codex decisions are unlikely to negatively affect global trade in the short term.</p> <p>Concerns Raised without Supporting Data</p> <p>While some countries expressed concerns about the revocation of CXLs (e.g. amitraz, methamidophos), Iran notes that the required data on national registration, treated crop surface, and international trade were not provided, and therefore, under the agreed management approach, revocation is justified.</p> <p>Residue Definition Issues</p> <p>Iran highlights the importance of addressing residue definition linkages, as seen in the cases of dinocap/meptyldinocap and acephate/methamidophos. We strongly support the EWG's recommendation to align residue definitions appropriately to ensure regulatory consistency and avoid unintended gaps or overlaps in Codex standards.</p> <p>The Islamic Republic of Iran supports the revocation of unsupported compounds as recommended, endorses the proposed approach for methamidophos in relation to acephate, and emphasizes the need to ensure that residue definitions are updated to reflect scientific reality. These steps will strengthen the transparency, predictability, and credibility of Codex work on pesticide residue</p>	
<p>Uruguay agradece el trabajo realizado por Chile como presidente del Grupo Electrónico y copresidido por Australia, Ecuador y Kenia sobre Compuestos sin apoyo.</p> <p>Agradece la preparación del Documento CX/PR 25/56/9.</p> <p>Se considera que se ha dado cumplimiento a lo indicado en el Procedimiento de Gestión de Compuestos sin apoyo que no son motivo de preocupación para la salud pública programados para revisión periódica, contenido en el Apéndice I.</p> <p>Se adhiere a las conclusiones y recomendaciones indicadas en el documento:</p> <ul style="list-style-type: none"> (i) Revocar todos los CXL para fentión (39), paratión-metil (59), dinocap (87), amitraz (122) y bitertanol (144). (ii) Revocar los CXL para el metamidofos (100) en la semilla de algodón, la remolacha forrajera, la patata (papa) y el azúcar, ya que estos productos no tienen CXL correspondientes para el acefato (95). (iii) Mantener todos los CXL para el metamidofos que tengan un CXL correspondiente para el acefato hasta que la JMPR realice la revisión periódica del acefato (95). (iv) Recomendar que la JMPR revise la definición del residuo de acefato (95) para incluir el metamidofos (100) al realizar la revisión periódica del acefato. 	<p>Uruguay</p>

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
To revoke all CXLs for fenthion (39), parathion-methyl (59), dinocap (87), amitraz (122), and bitertanol (144)	
<p>Canada supports the revocation of all CXLs for fenthion (39), parathion-methyl (59), dinocap (87) and bitertanol (144), neither of which is registered for use in Canada.</p> <p>For amitraz, Canada has no objection to the revocation of all CXLs, as the predominant use in Canada is for varroa mite control on bees, for which MRLs have been established for honey and honeycombs.</p>	Canada
<p>For Fenthion (39), Parathion-methyl (59), Amitraz (122), and Bitertanol (144), Iran concurs with the recommendation of the EWG to revoke all existing CXLs, as no country or organization has committed to providing the necessary data for JMPR evaluation. These compounds have not been reviewed for over 25 years, and retaining unsupported CXLs risks undermining Codex standards.</p>	Iran (Islamic Republic of)
<p>India has no objection for the revocation of all CXLs for amitraz, bitertanol, fenthion, parathion-methyl, dinocap and bitertanol.</p> <p>Rationale: In India, amitraz is not registered for use while fenthion, parathion-methyl and dinocap are banned for manufacture, import and use.</p>	India
<p>Fenthion (39), Parathion-methyl (59), Bitertanol (144)</p> <p>Indonesia supports this recommendation to revoke all CXLs for bitertanol, fenthion and Parathion-methyl</p> <p>Dinocap (87)</p> <p>Indonesia supports the revocation of all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for methyldinocap.</p>	Indonesia
<p>In principle, Thailand realizes the importance on the establishment of MRL for all pesticides registered in a country, especially for import and export products to avoid problematic trade due to lack of MRLs. Therefore, Thailand support the retention of the Codex MRLs for fenthion, parathion-methyl, bitertanol, and dinocap unless there is no safety concern, while existing a national registration.</p> <p>For Thailand, we have a concern about the proposal on revocation of Codex MRLs for amitraz because this substance is registered and used in our country. With this, we believe that many countries still also have it registered for use. Moreover, it does not pose any health concerns for consumers. However, we understand that the CCPR55 agreed the revocation unless scientific data could not be supported by Members and sponsors to JMPR for proposing to consider in CCPR56. We therefore would like to propose reservation on the revocation as the above-mentioned rationales.</p> <p>In addition, as these substances (fenthion, parathionmethyl, bitertanal, dinocap and amitraz) do not pose adverse health effects, Thailand is of the view that the name of these substances should still be retained in the Codex pesticide database if a decision is made to revoke their Codex MRLs. This is to be understandable that the revocation is not the result of safety concern and it is still opened for setting a new MRL once availability of scientific data.</p>	Thailand

COMMENT	MEMBER / OBSERVER
To revoke CXLs for methamidophos (100) in cottonseed, fodder beet, potato, and sugar as these commodities do not have corresponding CXLs for acephate (95)	
<p>Canada supports the following recommendation as noted in the circular letter, as they reflect similar decisions made at the time of Canada's re-evaluations of methamidophos/acephate:</p> <p>i. revoke the CXLs for methamidophos (100) in cottonseed, fodder beet, potato, and sugar as these commodities do not have corresponding CXLs for acephate (95).</p>	Canada
<p>Ghana supports the recommendation by the EWG to revoke the CXLs of selected molecules as listed in i) to iii).</p> <p>Rationale: Periodic evaluation of pesticides requires data submission for use by JMPR to conduct scientific evaluations of pesticide residues in food. JMPR then provides advice on the acceptable levels of pesticide residues in food moving in international trade.</p>	Ghana
<p>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.</p>	India
<p>Iran notes the complexity regarding methamidophos, given its role as a metabolite of acephate:</p> <p>Iran agrees to revoke the CXLs for methamidophos in commodities where there are no corresponding acephate CXLs (cottonseed, fodder beet, potato, sugar).</p>	Iran (Islamic Republic of)
To retain all methamidophos CXLs for which there is a corresponding acephate CXL until the JMPR conducts the periodic review of acephate (95)	
<p>Canada supports the following recommendation as noted in the circular letter, as they reflect similar decisions made at the time of Canada's re-evaluations of methamidophos/acephate:</p> <p>ii. retain all methamidophos CXLs for which there is a corresponding acephate CXL until the JMPR conducts the periodic review of acephate</p>	Canada
<p>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</p>	India
<p>Iran supports the retention of methamidophos CXLs in commodities where acephate CXLs exist, pending JMPR's periodic review of acephate.</p>	Iran (Islamic Republic of)
To recommend that JMPR revise the residue definition of acephate (95) to include methamidophos (100) when conducting the periodic review of acephate.	
<p>Canada supports the following recommendation as noted in the circular letter, as they reflect similar decisions made at the time of Canada's re-evaluations of methamidophos/acephate:</p> <p>iii. recommend that JMPR revise the residue definition of acephate to include methamidophos when conducting the periodic review of acephate.</p>	Canada

COMMENT	MEMBER / OBSERVER
<p>Nevertheless, concerning the fourth recommendation made to JMPR to revise the residue definition of acephate to include methamidophos when conducting the periodic review of acephate, the EU notes that, in the priority list, acephate is still in table 2B of compounds listed under the 15 years rule but not yet scheduled, whereas its last toxicological evaluation dates back to 2005. Advice on supporting data packages and/or an indication of manufacturer/member country support is needed.</p>	European Union
<p>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.</p> <p>Rationale: Methamidophos is not separately registered for use in India. 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.</p>	India
<p>Iran supports the EWG recommendation to request JMPR to revise the residue definition of acephate to explicitly include methamidophos at the next periodic review.</p>	Iran (Islamic Republic of)