

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda item 8**

**CX/PR 24/55/7-Add.1**

**May 2024**

**ORIGINAL LANGUAGE ONLY**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON PESTICIDE RESIDUES**

**Fifty-fifth Session**

**Chengdu, Sichuan province, People's Republic of China**

**3-8 June 2024**

### **MANAGEMENT OF UNSUPPORTED COMPOUNDS WITHOUT PUBLIC HEALTH CONCERN SCHEDULED FOR PERIODIC REVIEW**

#### **Comments in reply to CL 2024/46-PR**

submitted by

Australia, Canada, Chile, Colombia, Egypt, European Union (EU),  
Malawi, Peru, Sierra Leone, United Arab Emirates (UAE), United Kingdom (UK) and  
United States of America (USA)

#### **Background**

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/46-PR<sup>1</sup> issued in April 2024. 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 appendix**

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

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<sup>1</sup> <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 AND SPECIFIC COMMENTS**

COMMENT	MEMBER/OBSERVER
<p><u>General comment</u></p> <p>Australia considers that all CXLs for unsupported compounds scheduled for periodic review should be revoked, unless, for some reason, revocation of the CXLs will adversely affect the CXLs of other associated compounds on the Codex list of pesticides. In line with this position, Australia has the following comments on the recommendations presented in CL 2024/46-PR.</p> <p><i>Recommendation (i): To revoke all CXLs for bitertanol, fenthion, and parathion methyl</i></p> <p>Australia supports this recommendation (To revoke all CXLs for bitertanol, fenthion, and parathion methyl)</p> <hr/> <p><i>Recommendation (ii): To revoke all CXLs for amitraz</i></p> <p>Amitraz: Australia supports this recommendation.</p> <hr/> <p><i>Recommendation (iii): To delete all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap, until the periodic review of meptyldinocap is carried out. Some inconsistencies in the CXLs database regarding dinocap in Fruiting vegetables, cucurbits (group) and cucumber should be addressed.</i></p> <p>Australia considers that the CCPR should revoke all CXLs for dinocap.</p> <p>The revocation of all CXLs for dinocap should not have any adverse effect on the CXLs for meptyldinocap noting that the residue definition for meptyldinocap is currently 'dinocap, sum of isomers'. Therefore, there is no need to preserve the unsupported CXLs for dinocap as suggested.</p> <p>Australia suggests that CCPR raise a General Concern for the JMPR to request that consideration be given to changing the residue definition for meptyldinocap from 'dinocap, sum of isomers' to 'meptyldinocap'. Australia understands that this change may be easily implemented because the JMPR in 2010 only recommended that the current residue definition be applied while CXLs for dinocap were maintained. The current meptyldinocap CXLs were based on the recommendations by the JMPR in 2010 and the meptyldinocap residue trials assessed in 2010 addressed the meptyldinocap isomer alone.</p> <p>The current inconsistencies in the CXLs for dinocap in fruiting vegetables, cucurbits (group) and cucumber, melons and squash will no longer exist if all dinocap CXLs are revoked.</p> <hr/> <p><i>Recommendation iv: To delete all CXLs for methamidophos with the exception of those in rice, hay and/or straw and rice, husked commodities, which CXLs were set because residues of methamidophos arises from acephate uses.</i></p> <p>Methamidophos: Australia does not support this recommendation as it is currently presented.</p> <p>All uses of acephate and exposure to residues in feed will potentially lead to residues of methamidophos. This applies to all commodities for which acephate CXLs are established, not just rice, hay and/or straw and rice, husked. Since the current residue definition for acephate does not include methamidophos, in the absence of CXLs for methamidophos, residues of methamidophos detected in these commodities could present trade problems. Therefore, it is necessary to maintain all methamidophos CXLs for which there is a corresponding acephate CXL until the JMPR re-evaluates acephate, at which stage it would appear logical to change the residue definition for acephate to include methamidophos.</p> <p>The CXLs for methamidophos in cotton seed, fodder beet, potato and sugar beet may be revoked because there are no corresponding CXLs for acephate in these commodities.</p> <p>Australia notes that the CXLs currently listed for acephate in cabbages, head and tomato are incorrect. The 37CCPR (2005) revoked these two CXLs.</p>	<p><b>Australia</b></p>

COMMENT	MEMBER/OBSERVER
<p>Canada offers the following comments to each of the recommendations:</p> <p><i>Recommendation (i): To revoke all CXLs for bitertanol, fenthion, and parathion methyl</i></p> <p>Bitertanol, fenthion, and parathion methyl: Canada supports the revocation of all CXLs for these three compounds, neither of which is registered for use in Canada.</p> <hr/> <p><i>Recommendation (ii): To revoke all CXLs for amitraz</i></p> <p>Amitraz: Canada has no objection to the revocation of all CXLs, as the predominant use in Canada is for varroa mite control on bees.</p> <hr/> <p><i>Recommendation (iii): To delete all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap, until the periodic review of meptyldinocap is carried out. Some inconsistencies in the CXLs database regarding dinocap in Fruiting vegetables, cucurbits (group) and cucumber should be addressed.</i></p> <p>Canada supports the revocation of all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap, until the periodic review of meptyldinocap is carried out, which has yet to be scheduled. Meptyldinocap was first reviewed by JMPR in 2010 and thus has not yet reached the 15-year rule. Neither dinocap or meptyldinocap is registered for use in Canada.</p> <hr/> <p><i>Recommendation iv: To delete all CXLs for methamidophos with the exception of those in rice, hay and/or straw and rice, husked commodities, which CXLs were set because residues of methamidophos arises from acephate uses.</i></p> <p>Canada supports the recommendation to delete all CXLs for methamidophos with the exception of those arising from the use of acephate, such as rice, hay and/or straw and rice, husked. While methamidophos is registered for use on several commodities in Canada, none of them have corresponding CXLs.</p>	<p><b>Canada</b></p>
<p>Chile agradece la oportunidad de participar en los comentarios para este documento: Por el momento no se dará respuesta a la CL 2024/46, ya que aún está en proceso la definición de la posición país en el Subcomité Nacional.</p>	<p><b>Chile</b></p>
<p>Amitraz:  Banano LMR actual: 0.5  Naranja LMR actual:--  Papaya LMR actual:--</p>	<p><b>Colombia</b></p>
<p>i. Egypt appreciates the work which done in the document and agrees on the management of unsupported compounds without public health concern recommendations as follows :</p> <p>To revoke all CXLs for bitertanol, fenthion, and parathion methyl</p> <p>ii. For amitraz, to revoke all its CXLs</p> <p>iii. To delete allCXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap</p> <p>iv. To delete all CXLs for methamidophos with the exception of those in rice, hay and/or straw and rice, husked commodities</p>	<p><b>Egypt</b></p>
<p>The EU supports the recommendations proposed in the circular letter.</p> <p>In addition, at the 54th CCPR Meeting, it was agreed to publish the options for data support as an information document on the Codex webpage, however this document cannot be found on the Codex website, therefore the EU would like to know when the publication of the document is scheduled.</p>	<p><b>European Union</b></p>

COMMENT	MEMBER/OBSERVER
i. Bitertanol, fenthion, and parathion methyl: Malawi agrees with this decision ii. Amitraz: Malawi agrees with this decision iii. Dinocap: No objection from Malawi iv. Methamidophos: No objection from Malawi	<b>Malawi</b>
<p>La Comisión Técnica Nacional de Residuos de Plaguicidas agradece al Comité del Codex sobre Residuos de plaguicidas por él envió de la carta circular CL 2024/46-PR Solicitud de observaciones sobre las recomendaciones para la gestión de compuestos sin apoyo y que no son motivo de preocupación en materia de salud pública programados para la revisión periódica.</p> <p>La Comisión NO tiene observaciones o comentarios sobre las recomendaciones para la gestión de compuestos sin apoyo y que no son motivo de preocupación en materia de salud pública programados para la revisión periódica.</p>	<b>Peru</b>
Sierra Leone supports the recommendations.	<b>Sierra Leone</b>
<p><u>General comments</u></p> <p>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.</p> <p>For 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.</p> <hr/> <p><i>Recommendation (i): To revoke all CXLs for bitertanol, fenthion, and parathion methyl</i></p> <p><i>Recommendation (ii): To revoke all CXLs for amitraz</i></p> <p>Amitraz: 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).</p> <hr/> <p><i>Recommendation (iii): To delete all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap, until the periodic review of meptyldinocap is carried out. Some inconsistencies in the CXLs database regarding dinocap in Fruiting vegetables, cucurbits (group) and cucumber should be addressed.</i></p> <p>Dinocap: 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 of Dinocap.</p> <hr/> <p><i>Recommendation iv: To delete all CXLs for methamidophos with the exception of those in rice, hay and/or straw and rice, husked commodities, which CXLs were set because residues of methamidophos arises from acephate uses.</i></p> <p>Methamidophos 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).</p> <p>United Arab Emirates suggests revoking MRLs for Methamidophos (100) and Acephate (95).</p>	<b>United Arab Emirates</b>
The UK supports revocation of the CXLs for bitertanol, fenthion, and parathion methyl and amitraz, and the proposed approaches for the CXLs for amitraz, dinocap and methamidophos.	<b>United Kingdom</b>

COMMENT	MEMBER/OBSERVER
<p>The United States would like to highlight the internal working procedures of the EWG summarized in the Report of the 54th Session of CCPR (REP23/PR54-Appendix XII). The EWG's work on the unsupported compounds, as summarized in CX/PR 24/55/7, helps pilot these internal working procedures and is intended to ensure that there is a clear process for determining their support.</p> <p>In reviewing the EWG recommendations to revoke CXLs, the United States would like to call attention to paragraphs 10-12 of the internal working procedures (REP23/PR54-Appendix XII, Para 10-12).</p> <p>10. For those compounds for which support is obtained, the member (s) should inform both the Chair of the EWG on Priorities and the Chair of the EWG on Unsupported Compounds whether all or some of the CXLs will be supported and should specify each supported and unsupported CXL and the timeframe for provision of relevant data to JMPR. The timeframe proposed for generating and providing data, should not exceed four-years (four-year rule as specified in the Codex Procedures Manual).</p> <p>11. For substances where support for one or more CXL for an unsupported substance is announced and support can be realized as described before, the remaining unsupported CXL will be revoked after renewal of the compound.</p> <p>12. For compounds and their CXLs for which there is no support obtained according to points 5–10, CCPR should once again ask for support. If no support is given, the withdrawal of CXLs should be endorsed in the following CCPR meeting.</p> <p>According to paragraph 12, the United States believes that the appropriate procedure is for CCPR to again request whether there is support at CCPR55 for the compounds bitertanol, fenthion, parathion methyl, amitraz, dinocap, and methamidophos. If there is no support at CCPR55, then the internal working procedures indicate that CCPR should then endorse the withdrawal of CXLs at the following 56th session of CCPR in 2025.</p>	<p><b>United States of America</b></p>