

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 6, 7, 8, 9, 10, 11, 12

CRD11

June 2024

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

55th Session

Chengdu, Sichuan province, People's Republic of China

3-8 June 2024

Comments submitted by United Arab Emirates

Agenda Item 6

CX/PR 24/55/5 – CL 2024/44-PR

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

CL 2024/PR/44: Request for comments at Step 3 on the recommendations of the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) (2023):

United Arab Emirates provides comments on the recommendations for step 3 on the pesticides cited in the circular letter.

Codex Code	Compound	United Arab Emirates comments
331	1,4- Dimethylnaphtalene	UAE welcomes the MRLs setting for 1,4- Dimethylnaphtalene which contributes to harmonized international compliance procedures.
246	Acetamiprid	No objection to MRLs set for soya beans
221	Boscalid	No objection to MRLs set for pomegranate
72	Carbendazim	UAE supports the withdrawal of current MRLs due insufficient toxicological information
96	Carbofuran	UAE supports the withdrawal of current MRLs as it is not possible for JMPR to estimate STMR and/or HR or trials not matching the cGAP.
145	Carbosulfan	UAE supports the proposed MRLs for eggplants (0.36 mg/kg) and of mango (0.1 mg/kg) based on provided supervised trials. The recommendations of withdrawal of current MRLs for the other commodities due to insufficient number of trials is also supported.
238	Clothianidin	UAE welcomes the MRLs setting for Clothianidin for many group commodities based on supervised trials as this contributes to harmonized international compliance procedures. UAE supports the withdrawal of MRLs for celery, Fruiting vegetables other than cucurbits and pecan upon availability of the results of new supervised trials.
263	Cyantraniliprole	UAE welcomes the MRLs setting for Cyantraniliprole for many group commodities of plant and animal origin based on supervised trials as this contributes to harmonized international compliance procedures. UAE supports the withdrawal of MRLs for dry beans (VD 0071), dry soya beans (VD 4521) that were replaced by MRLs extended respectively to the subgroup of dry beans (VD 2065) and subgroup of dry peas (VD 2066) upon combination of data for mutual support.

273	Cyflumetofen	UAE welcomes the MRLs set by JMPR for additional new uses
135	Deltamethrin	UAE welcomes the MRLs set by JMPR for additional new uses as per Papaya. Papaya is widely exported by UAE, setting MRL will lead to harmonized international compliance
224	Difenoconazole	UAE welcomes the MRLs set by JMPR for additional uses.
130	Diflubenzuron	UAE welcomes the MRLs set by JMPR for additional new uses as per green and black tea fermented and infusions. Black and green tea are widely exported commodities by UAE, setting MRL will lead to better harmonization in compliance procedures.
255	Dinotefuran	No comments
247	Emmamectin	No comments
332	Florylpicoxamid	UAE welcomes the MRLs setting by JMPR as new evaluation.
333	Fluazinam	UAE emphasizes the commitment of CCPR to the science-based evidence and supports its decision to not set MRLs for Fluazinam due to issues regarding the metabolites, impurities disabling the residue definition of fluazinam for plant dietary risk assessment.
243	Fluopyram	Some inaccuracies were spotted concerning the STMR for eggs and poultry milk. While JMPRR (2017) reported values of 1,4 and 0,95 respectively, the 2023 JMPR report mentioned 1.5 and 0.97 respectively.
267	Imazapyr	Regarding the MRLs for rice commodities are accepted by UAE according to the risk assessment conducted recently by national authorities.
111	Iprodione	UAE acknowledges the work of JMPR in setting MRLs for Iprodione. MRLs for rice are also accepted by UAE based on the dietary risk assessment conducted recently by national authorities.
334	Isocycloseram	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
330	Isoflucypram	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
335	Isotianil	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
336	Mepiquat-chloride	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
291	Oxathiapiprolin	UAE welcomes the MRLs setting by JMPR as new evaluation based on supervised trials.
120	Permethrin	UAE emphasizes the commitment of CCPR to the science based evidence and supports the decision to not set MRLs for permethrin due to late submission of relevant key data.
62	Piperonyl-butoxide	UAE proposes the withdrawal of MRLs for: stone fruits, blackberry, strawberry, cabbage, leafy vegetables, coffee, herbs, spices (seeds), and processed commodities since no recommendations were proposed by JMPR in its 2023 Evaluation.
142	Prochlaz	No comments

160	Propiconazole	UAE would like to raise a reservation on MRL set for polished rice as the proposed MRL (10ppm) may have a potential health concern to UAE population according to the risk assessment based on national data.
63	Pyrethrins	No comments
324	Tetraniliprole	No comments
245	Thiamethoxam	No comments
77	Thiophanate-methyl	UAE welcomes the withdrawal of MRLs for all commodities and especially rice commodities due to the absence of GAP information. UAE is willing to comment on the MRLs that will proposed later according to the results of its risk assessment.
337	Tricyclazole	No reservation on the MRL set for rice according to UAE risk assessment
118	Zeta-cypermethrin	Ncomments

Agenda Item 7**CX/PR 24/55/6 – CL 2024/45-PR****Guidelines for monitoring the purity and stability of reference materials and related stock solutions of pesticides during prolonged storage (at Step 4)****CL 2024/PR/45: Request for comments at Step 3 on the Guidelines for monitoring the purity and stability of reference materials and related stock solutions of pesticides during prolonged storage**

United Arab Emirates acknowledges the work done by the EWG on the monitoring the purity and the stability of CRM since 2019. United Arab Emirates already implements the different requirements cited in the draft standard since it follows the international texts especially Document N° SANTE/11312/2021. Moreover, Unites Arab Emirates would like to recommend to also apply the current standard for the RM of the food contaminants as it helps laboratories to still using the RM for other purposes such as data monitoring of import/export.

Agenda Item 8**CX/PR 24/55/7 – CL 2024/46-PR****Management of unsupported compounds without public health concern scheduled for periodic review****CL 2024/PR/46: Request for comments on the recommendations for the management of unsupported compounds without public health concern scheduled for periodic review**

2i and 2ii: 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).

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.

2-iii- 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.

2-iv- 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).

United Arab Emirates suggests revoking MRLs for Methamidophos (100) and Acephate (95).

Finally, 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.

Agenda Item 9**CX/PR 24/55/8 – CL 2024/47-PR****National registrations of pesticides****CL 2024/PR/47: Request for comments on the recommendations for national registrations of pesticides for the purpose of periodic review**

i: Whether the general approach to the development of the database for the national registration of pesticides is appropriate – please indicate any further improvements that can be incorporated to facilitate data collection and analysis.

United Arab Emirates considers that the National Registration of pesticides (NRP) is an efficient tool that help CCPR to decide about the periodic review of the unsupported compounds. However, the data provided by members should be updated and evaluated by CCPR before being used.

ii: Whether sufficient responses are available to support the periodic review of unsupported compounds with no public health concern which are no longer be supported by the manufacturer (see also Agenda Items 8 and 10).

This question could only be addressed by Codex Secretariat where all responses are compiled.

iii. Whether a smaller number of substances can be foreseen for the next years exercise on the database for the national registration of pesticides.

Concerning Group 3 for which toxicological evaluation is available before 2000, United Arab Emirates suggests the evaluation of Profenofos which frequently appears in: gourd, okra, strawberry, alfalfa, celery, guava and lemon.

iv. Whether the results of this exercise should be submitted to the EWG on unsupported compounds without public health concerns to decide on whether it would be useful (a) to consider an active substance from Group 1 or 2 for their future work and (b) to start discussions on those substances from Group 3 where no support is given so far.

To achieve a better consensus, United Arab Emirates suggests that the results of this exercise should be submitted to the EWG on unsupported compounds without public health concerns to decide accordingly.

v. Provide any further suggestion not covered under the above points.

United Arab Emirates suggests that Codex coordinates workshops to provide more insight on the requirements of the NRP for members which will have positive impact on the quality of data provided by member countries.

Agenda Item 10**CX/PR 24/55/9 – CL 2024/43-PR****Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR****CL 2024/PR/43: Request for comments on the establishment of schedules and priority lists of pesticides for evaluation / re-evaluation by the Joint FAO/WHO Expert Meetings on Pesticide Residues (JMPR)**

United Arab Emirates as a member of the EWG on CCPR Priorities and Lists for evaluation by JMPR, acknowledges the work achieved by the EWG and there is no further comments on 2024 Priority Lists that are currently closed. Concerning 2025 Schedules, United Arab Emirates has no nominations, but field trials are planned to be conducted soon for some pesticides that have no current CLXs. Upon the validation of the results, the data will be communicated to 2026 Priority List EWG.

Agenda Item 11**CX/PR 24/55/10 – CL 2024/48-PR****Enhancement of the operational procedures of CCPR and JMPR**

Regarding the proposed short-term and long-term approaches presented in Appendix I of the discussion paper prepared by the EWG on the enhancement of the operational procedures of CCPR and JMPR, United Arab Emirates recognizes the efforts done by CCPR/JMPR to close the increased work required for pesticide evaluation.

United Arab Emirates agrees with the short-term approach and would like to add some suggestions for the long-term approach. CCPR should identify and implement a process for training experts to join JMPR which will help to avoid the long procedure of JMPR expert election. Also, the long-term approach should include the development of software tools to data submission which will facilitate the evaluation of data that will be used for MRL setting. In this context, member countries could transfer their knowledge in developing such a software.

Agenda Item 12**CX/PR 24/55/11 – CL 2024/49-PR****Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF Working Group on Compounds for Dual Use – Status of Work****CL 2024/PR/49: Request for comments on the recommendations for MRLs for eggplant (VO 2046)**

Regarding the recommendations for the establishment of maximum residue limits (MRLs) for eggplant as presented in Appendix I of CX/PR 24/55/12, United Arab Emirates has checked and agrees with the approach performed for the purpose to establish MRLs for the groups of eggplant (VO 2046) and advises that the MRLs and the assessment of the data presented in the document CX/PR 24/55/12, should be referred to JMPR for review by CCPR in 2025 which will allow member countries to further discuss the recommended MRLs.