

# 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

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## 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 Philippines*

#### Agenda Item 6

CX/PR 24/55/5 – CL 2024/44-PR

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

##### POSITION

The Philippines acknowledges its agreement to the proposed Maximum Residue Limits (MRLs) in plant and animal commodities aligned with Step 3 of the Codex Procedure, as presented during the 2023 Joint Meeting on Pesticide Residues (JMPR). Furthermore, the Philippines supports other pertinent recommendations delineated in Annex of CL 2024/44-PR, which hold relevance to the endeavors of the upcoming Codex Committee on Pesticide Residues (CCPR55) meeting.

The Philippines expresses appreciation for the diligent work of the Joint Meeting on Pesticide Residues (JMPR). The insights provided by the FAO Panel of Experts regarding pesticide residue and analytical aspects will be valuable for establishing reference data on their metabolism, environmental fate, usage, as well as for estimating Maximum Residue Levels (MRLs) based on Good Agricultural Practices (GAP). Additionally, the Philippines supports the recommendations made by the WHO Core Assessment Group regarding the evaluation of toxicological data to determine acceptable daily intakes (ADIs) and acute reference doses (ARfDs) of pesticides.

##### REASON

Although most of the 35 pesticide compounds reviewed are registered in the Philippines, we currently lack local scientific data necessary to support their risk assessment such as toxicological studies. Consequently, though adherence to Codex standards is voluntary in nature, the Philippines is inclined to adopt the set Codex MRLs to harmonize with the international food safety standards and meet the requirements of the WTO-SPS and TBT agreements. However, it is important to note that the Philippine government is taking proactive measures to establish laboratories capable of generating pesticide residue data and associated technical documentation to support stakeholders. Moreover, we are keenly open to collaborating with other organizations and agencies to produce valuable outputs that will contribute to the activities of the Codex Committee on Pesticide Residues (CCPR).

#### 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)

##### POSITION

The Philippines expresses its support in advancing the guidelines to the next step of the Codex Procedure. These guidelines provide two analytical approaches including the acceptability criteria that can be considered by pesticide residue laboratories in monitoring and verifying the stability and purity of the reference materials during prolonged storage periods. This will enable the laboratories to use the reference materials beyond their expiry date stated in the product information sheet/CoA, subject to compliance with the prescribed storage conditions and other specified protocols outlined within the guidelines.

## REASON

This document will serve as guidance to assist the accredited laboratories on how to properly monitor the stability and purity of the reference materials and their stock solutions. One of the salient points within these guidelines is the inclusion of criteria outlining the acceptability of reference materials such as storage conditions and quantitative measurements, thereby providing a structured approach for laboratories to assess the suitability of these materials for continued use. General detectors for the analysis through liquid and gas chromatography were also identified in the guidelines providing more options for monitoring the integrity of the reference materials.

In light of these considerations, the Philippines firmly believes that the adoption and implementation of these guidelines will significantly enhance the capabilities and efficiency of pesticide residue laboratories, ultimately contributing to the advancement of food safety standards globally.

**Agenda Item 8****CX/PR 24/55/7 – CL 2024/46-PR****Management of unsupported compounds without public health concern scheduled for periodic review**

## POSITION

The Philippines supports the recommendations of the JMPR regarding the management of unsupported compounds without public health concerns, which are scheduled for periodic review. Specifically, the Philippines concurs with the decision to revoke all Codex Maximum Residue Limits (CXLs) for bitertanol, fenthion, and parathion methyl, as well as for amitraz, a dual-use compound. Regarding dinocap, the Philippines also endorses the deletion of CXLs, except for commodities with CXLs for meptyldinocap, pending the completion of its periodic review. Lastly, Philippines agrees to eliminate CXLs for methamidophos, except for rice, hay, straw rice, and husked commodities, for which the presence of methamidophos can be traced back to the use of acephate.

## REASON

The JMPR Electronic Working Group (EWG) was informed of the veterinary use of amitraz for controlling external parasites in domestic animals, as well as its application as a miticide for varroa control in beehives. In the Philippines, amitraz holds registration solely as a veterinary drug with the Food and Drug Administration. Given that the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF) has not established Maximum Residue Limits (MRLs) for amitraz, it is prudent for us to support the revocation of its CXLs. Bitertanol is registered in the Philippines for use in banana and asparagus crops, while fenthion is registered for application in rice, mango, tobacco, banana, sweet potato, and white potato cultivation. The Fertilizer and Pesticide Authority will notify the registrants about the latest developments concerning these unsupported compounds. Dinocap, methamidophos, and parathion methyl do not hold any registrations in the country.

**Agenda Item 9****CX/PR 24/55/8 – CL 2024/47-PR****National registrations of pesticides**

## POSITION

The Philippines concurs with the recommendations on Agenda Item 9 regarding the advancement of work on the database for national pesticide registrations, aimed at facilitating periodic reviews of compounds by the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) and subsequent deliberations by the Codex Committee on Pesticide Residues (CCPR).

## REASON

The Philippines understands the importance of providing information on national registrations of pesticide as one of relevant data in determining which pesticide compounds will be scheduled and prioritized for the JMPR review. The Philippines will make an effort to submit pesticide registration data for this year's exercise. There are no further suggestions that we want to include in the proposed approach for the development of the database.

**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**

## POSITION

The Philippines supports the proposed 2025 schedule and priority list for JMPR evaluation of the following compounds/pesticides to generate new food standards and related texts:

1. proquinazid
2. dimpropyridaz
3. acequinocyl
4. ipflufenquin
5. spidoxamat
6. tiafenacil
7. 1-octanol
8. metarylpicoxamid (XDE-747)
9. fluopyram
10. mefentrifluconazole
11. kresoxim-methyl
12. dinotefuran
13. trifloxystrobin
14. pyriproxyfen
15. etoxazole
16. indoxacarb
17. thiamethoxam
18. boscalid
19. isocycloseram
20. cyprodinil
21. oxathiapiprolin
22. fludioxonil
23. cyantraniliprole
24. flubendiamide
25. metaflumizone
26. metconazole
27. difenoconazole
28. pyraclostrobin
29. bifenthrin
30. pyriofenone
31. beta-cyfluthrin
32. broflanilide
33. mepiquat chloride
34. flupyradifurone
35. glyphosate
36. tetraniliprole
37. fluazaindolizine
38. spinetoram
39. sulfoxaflor
40. fluindapyr
41. fosetyl-Al
42. isotianil
43. tebuconazole
44. bixafen
45. phosphoric acid
46. 2-phenylphenol
47. fenbutatin oxide
48. malathion
49. pirimicarb
50. hydrogen phosphide
51. clethodim
52. guazatine
53. captan
54. dimethoate

## REASON

The Philippines agrees to the proposed evaluation of the priority list of pesticide compounds. The evaluation to be conducted by the JMPR offers a pivotal opportunity for the Philippines to establish food safety standards within its agricultural sector. The outcomes of the JMPR assessment will serve as a valuable reference for the Philippines for adoption to its national standards and pesticide regulations. Tables 1 and 2 present an overview of the status of registrations in the Philippines of the prioritized list of pesticide compounds for evaluation by JMPR in 2025, as documented by the Fertilizer and Pesticide Authority. The pesticide industry representatives in the Philippines also confirmed the schedule of review of their products, actively represented by their respective parent companies.

**Table 1.** Pesticides in the Priority List with Registered Use in the Philippines (30 out of 54)

Pesticide	Status of Registration in the Philippines (Yes/No)
2-phenylphenol	Yes
Beta-cyfluthrin	Yes
Bifenthrin	Yes
Boscalid	Yes
Broflanilide	Yes
Captan	Yes
Clethodim	Yes
Cyantraniliprole	Yes
Difenoconazole	Yes
Dimethoate	Yes
Dinotefuran	Yes
Flubendiamide	Yes
Fludioxonil	Yes
Fluopyram	Yes
Fosetyl-aluminum	Yes
Glyphosate	Yes
Indoxacarb	Yes
Isocycloseram	Yes
Isotianil	Yes
kresoxim-methyl	Yes
Malathion	Yes
Metaflumizone	Yes
Pyraclostrobin	Yes
Pyriproxyfen	Yes
Spinetoram	Yes
Sulfoxaflor	Yes
Tebuconazole	Yes
Tetraniliprole	Yes
Thiamethoxam	Yes
Trifloxystrobin	Yes

**Table 2.** Pesticides in the Priority List without Registration in the Philippines (24 out of 54)

<b>Pesticide</b>	<b>Status of Registration in the Philippines (Yes/No)</b>
1-octanol	No
Acequinocyl	No
Bixafen	No
Cyprodinil	No
Dimpropridaz	No
Etoxazole	No
Fenbutatin oxide	No
Fluazaindolizine	No
Fluindapyr	No
Flupyradifurone	No
Guazatine	No
Hydrogen phosphide	No
Ipflufenquin	No
Mefentrifluconazole	No
Mepiquat chloride	No
Metarylpicoxamid (XDE-747)	No
Metconazole	No
Oxathiapiprolin	No
Phosphoric acid	No
Pirimicarb	No
Proquinazid	No
Pyriofenone	No
Spidoxamat	No
Tiafenacil	No

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

The Philippines concurs with the short and long-term approach recommended by the Electronic Working Group (EWG) to enhance CCPR and JMPR's operational procedures as well as any possibilities and challenges that may come about because of these changes. There are no further suggestions that we want to include in the proposed strategy.

**REASON**

JMPR has expressed concerns that the routine meetings are excessively lengthy as it is and adding more to the timetable will not guarantee an increase in efficiency in its scientific evaluation. Additionally, it's crucial to highlight that the members of JMPR serve as volunteer peer reviewers rather than working on a full-time basis. Therefore, the Philippines agree that it might be more beneficial to arrange a special meeting dedicated solely to evaluating new uses of compounds. This emphasis on new uses aligns with the findings of the 2019 extraordinary meeting, which determined that complex assessments, such as new evaluations or periodic reviews, are not feasible during additional meetings due to the scarcity of available experts.

The Philippines also supports the long-term approach to address strategic concerns related to CCPR/JMPR policy and procedures. Leaning on a third-party assessor provides a different vantage point and may offer substantial inputs and help identify key priorities and craft a strategic plan with a timeline to resolve persistent issues concerning JMPR's review capacity, staffing, resource allocation, and operational framework.