

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Comments submitted by Japan

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)

Japan would like to provide the following comments on draft guidelines (Appendix I of CX/PR 24/55/6).

Regarding testing laboratories in the scope of the guideline, ISO/IEC 17025 accreditation is not necessarily required within the framework of Codex. The requirements of the competence of testing laboratories involved in the import and export control of food are shown in the Codex guideline (CXG 27-1997). For consistency in the requirements for the competence of testing laboratories among Codex texts, Japan proposes the amendments as follows:

1) PREFACE, Paragraph 5, third line

The document would provide guidance to ~~the accredited~~ laboratories to monitor the stability and purity of RMs for their possible use beyond their expiry dates as well as for continued use of stock solutions which retain stability and purity.

2) GENERAL CRITERIA, Paragraph 1

The analysis should be conducted in ~~an ISO/IEC 17025 accredited laboratories in compliance with the general criteria for testing laboratories laid down in ISO/IEC 17025,~~ with the scope relevant to the measurement concerned.

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

Japan supports the revocation of CXLs for fenthion, parathion-methyl, dinocap, amitraz and bitertanol, in view of lack of support by manufacturers.

On the other hand, while recognizing the high toxicity of methamidophos and the need to globally phase out its *use as pesticide*, revocation of its CXLs requires more careful deliberation, since its residue also arises from the use of acephate. The same would apply for the revocation of CXLs for any compound whose metabolite is contained in the residue definition of another compound or which itself is the metabolite of another compound.

On the basis of the following observations concerning the existing methamidophos CXLs, Japan proposes that revocation of methamidophos CXLs should be considered in conjunction with the periodic re-evaluation of acephate in the near future, in order to avoid inadvertent revocation of methamidophos CXLs required to support the authorized uses of acephate.

- According to the JMPR evaluations 2003, methamidophos CXLs for artichoke, globe, beans with pods (*Phaseolus* spp.) (immature pods and succulent seeds) and soya bean (dry), not only those for rice, husked and rice, hay and/or straw as indicated in para. 2.iv of CL 2024/46-PR, seem to have been established on residues arising from acephate uses.
- In the same JMPR meeting, in estimating the residue levels of methamidophos in animal commodities, animal dietary burdens were calculated by using the residues in apple, potato, cotton and sugar beet, the CXLs for which no longer exist or are proposed for revocation. Instead, animal dietary burdens should be re-calculated using the residues in soya bean (dry) and rice, hay and/or straw, the CXLs for which are likely to be retained.

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

Japan would like to commend the meticulous work of the chair and co-chairs to summarize various comments and proposals of members and observers into the discussion paper. Japan continues to support initiatives to improve the operational procedures of CCPR and JMPR for increased outputs.

In our view, the most promising and realistic approach is to arrange rules, procedures and/or tools to ensure that only complete and well-organized data set reach JMPR experts for review. We have learned from some JMPR experts that resources of the JMPR have often been “wasted” due to incomplete submissions from manufacturers.

Another approach would be to enhance the frequency or duration of JMPR meetings or the number of JMPR experts. However, considering the already high workload of existing JMPR experts and difficulties to recruit and train new experts, it is a less realistic approach at least in the short run.

Last but not least, scientific robustness and neutrality of JMPR evaluations should never be sacrificed for the sake of efficiency in standard setting process. Any measure to this effect would jeopardize the reputation of the Codex as the science-based international standard-setting body in the area of food safety recognized by WTO/SPS.