

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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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 Thailand

Agenda Item 6

CX/PR 24/55/5 – CL 2024/44-PR

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

In principle, Thailand does not object the proposed Maximum Residue Limits (MRLs) for pesticides in food and feed in this agenda item, particularly in case the results of evaluation express that it is safe for consumers.

However, we express concern regarding the removal of Codex Maximum Limits (CXLs) for Carbendazim. We acknowledge that this substance is currently registered for use in many countries, including Thailand. Our observation is that the withdrawal of the existing Acceptable Daily Intake (ADI) and Acute Reference Dose (ARfD) values by the WHO Core Assessment Group is primarily due to insufficient toxicological information for re-evaluation, rather than public health concerns. This situation poses challenges in trade due to the absence of MRLs.

To address these trade-related issues, we therefore propose retaining all CXLs for Carbendazim under the 4-year rule. Additionally, we strongly urge relevant companies to provide the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) with the necessary scientific data for thorough evaluation.

Notes for consideration for CCPR55: For consideration under Agenda Item 6

4. MRLs for okra, martynia and roselle

Thailand agrees with applying the wording "MRL provisionally applies to okra, martynia, and roselle" to CXLs for the group of Fruiting Vegetables, other than Cucurbits (VO 0050) and subgroup of Peppers (VO 0051) for clarification and consistency with the decision taken at CCPR54 (2023). This implementation aligns with the objective of facilitating fair trade practices, which is a key goal of the Codex.

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)

- **APPENDIX I**

Replacing all the documents "information sheet" to "reference material document"

- **GENERAL CRITERIA**

- In Para 2: replace "ISO/IEC 17034" to "ISO 17034"
- In Para 3: change "metrological" to "metrological traceability"
- The paragraph numbering should continue from above.

- **CRITERIA FOR STORAGE CONDITIONS FOR PESTICIDE REFERENCE MATERIALS AND THEIR STOCK SOLUTIONS**

In the footnote 4, Para 7 replace “SANTE/11312/2021, Implemented by 01/01/ 2022, European Commission Directorate General for Health and Food Safety.” to “SANTE/11312/2021 V2, Implemented by 01/01/2024, European Commission Directorate General for Health and Food Safety.”

- **ANALYTICAL PROTOCOL FOR MONITORING THE STABILITY AND PURITY OF PESTICIDE REFERENCE MATERIALS AND INDIVIDUAL STOCK SOLUTIONS**

Both para 9 and 10 should specify how often the RM/CRM need to be monitored.

- **Approach 1: Comparing the stability of old and freshly acquired pesticide reference standards; applicable to neat standards of reference materials and related stock solutions**

- Since this approach is based on the comparison between newly acquired RM and expired RM, it is easier to explain by using the newly acquired RM as a calibrator and the expired RM as an unknown sample. By using one-point calibration, the concentration of the unknown sample can be calculated.
- Add additional sentence “The use of appropriate statistical method should be applied for prediction of shelf-life to the RM/CRM.”
- Para 13: since the instrumental drift might occur during the injection, internal standard is therefore necessary.
- Add additional sentence “Monitoring stability of the RM over time, a plot of the measured purity/concentration from each time point should be applied, the trend of any instability, therefore, can be predictable. This control chart is necessary since it can prevent the use of an expired RM/CRM.”

- **Approach 2: Verification of purity of neat standards of pesticide reference materials during prolonged storage (not suitable for verification of stock solutions)**

- This approach is based on comparing the RM purity (chromatograms, conditions) mentioned in the RM documents provided by the supplier. However, in some cases that the producer does not provide the chromatographic assay, laboratory should start collecting the chromatographic assay prior to expire.
- Add additional sentence “Alternatively, assessment the purity of the neat standards can be performed by other approaches (mass balance, Nuclear Magnetic Resonance (NMR))”

- **Page 6 for ANNEX Definitions**

“**Product information sheet or Certificate of Analysis (COA)**” should be changed to “**Reference material document**” since the product information sheet is used for an RM other than a CRM [ISO Guide 31] while Certificate of Analysis (COA) or RM certificate is specifically used for a CRM. Reference material document (RM document) is defined as “document containing all the information that is essential for using any RM” which is more generic and covers both CRM and non-CRM.

Agenda Item 8

CX/PR 24/55/7 – CL 2024/46-PR

Management of unsupported compounds without public health concern scheduled for periodic review**Bitertanol, Fenthion, and Parathion-methyl.**

Thailand has not objection on the revocation of Codex Maximum Limits (CXLs) for bitertanol, fenthion, and parathion-methyl.

Dinocap

Thailand does not oppose the removal of all Codex Maximum Limits (CXLs) for dinocap, for those associated with commodities that already have established CXLs for metyldinocap, until the periodic review of metyldinocap is conducted. Additionally, Thailand agrees that CCPR address inconsistencies in CXLs for dinocap within the fruiting vegetable group, particularly for cucurbits and cucumbers, as recorded in the database.

Amitraz

In principle, the guideline on the management of unsupported compounds without public health concern, scheduled for periodic review, should aim to comprehensively cover the combination of registered or authorized pesticides and commodities. Despite lacking public health concerns, these compounds, have been used and registered in several agricultural producing countries. The absence of Maximum Residue Limits (MRLs) for these compounds can lead to significant trade challenges, even though these challenges do not directly relate to public health concern. This situation does not align with the objective of facilitating fair trade practices, which is a key goal of the Codex.

Therefore, Thailand strongly advocates for retaining Codex Maximum Limits (CXLs) for amitraz. Referring to CX/PR 24/55/8, Appendix I, the summary of results from all three databases indicates that amitraz has been registered in 10 countries, with applications spanning 1-19 groups/subgroups. Notably, amitraz remains registered in Thailand.

Methamidophos

Thailand does not oppose the removal of all CXLs for methamidophos, except for those associated with rice hay and straw, as well as husked rice resulting from the use of acephate. It is important to note that Thailand classifies methamidophos as a Hazardous Substance Category 4 (banned substance) under our regulations, signifying its potential hazards to both human health and the environment.

Agenda Item 9

CX/PR 24/55/8 – CL 2024/47-PR

National registrations of pesticides

In general, Thailand supports the use of a national registration database (NRD). We find the NRD table format to be user-friendly. The database also serves as a valuable tool for prioritizing substances for evaluation. However, it lacks real-time updates on the registration status of pesticides, which results to the restriction on the effectiveness of the use.

So, we would like to propose that databases specify the registration period for permitted substances or establish a regular time frame for updating the database. This approach would ensure that the information remains current. An updated NRD would provide timely data for other relevant Expert Working Groups (EWGs) and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR), simplifying the periodic review process.

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

Thailand concurs with Codex schedules and priority list of pesticides for evaluation/re-evaluation by JMPR.

However, we have specific comments regarding the inclusion of certain substances in the lists as follows:

B. Finalising the 2025 proposed schedule

We would like to propose adding **Spinetoram in broccoli**, **Chinese** and **Indoxacarb in Thai eggplant** for evaluation by JMPR in '2025 new use – other' worksheet.

C. Priority lists 2026 and beyond – table 1

We would like to propose including **Chlorantraniliprole in Thai eggplant** for JMPR evaluation in '2026 & beyond-new use-other' worksheet.

Agenda Item 11

CX/PR 24/55/10 – CL 2024/48-PR

Enhancement of the operational procedures of CCPR and JMPR

In principle, Thailand supports the imperative to enhance the operational procedures of CCPR and JMPR to meet the anticipated demand for evaluations. Thus, we agree with the short-term and long-term approaches, recognizing their potential to facilitate the timely accomplishment of scheduled evaluations for priority pesticide lists by the JMPR. Furthermore, we realize the benefits of conducting an organizational assessment. Such an evaluation would yield valuable recommendations to enhance working procedures and mechanisms.

In addition, we support continuously training and creating new JMPR evaluators. Also, inviting these newly trained evaluators in actively participating in the evaluation of less complex new uses would contribute to the effectiveness of the process.

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

Thailand supports the ongoing efforts of the Joint CCPR/CCRVDF EWG under the current Terms of Reference (ToRs). Additionally, based on the challenges found, we agree with the proposed recommendation to convene a virtual Joint Physical Working Group.

Agenda Item 13

CX/PR 24/55/12 – CL 2024/50-PR

Analysis of previous decisions by CCPR to establish MRLs for tomato and pepper to establish corresponding MRLs in eggplant

Thailand supports the establishment of Maximum Residue Limits (MRLs) for subgroup eggplant (VO 2046) listed in the table presented in Appendix I of CX/PR 55/24/12.

Rationale: The methodology of identification and analysis of compounds that was used aligns with the principles of extrapolation, and using pepper and/or tomato as representatives for setting those MRLs ensures a robust approach.