

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 6, 8, 9, 10, 11, 12, 13

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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 Indonesia

Indonesia would like to express its appreciation to the Codex Committee on Pesticide Residues for their efforts in organizing the 55th Session. In addition, Indonesia would like to submit the following comments.

Agenda Item 6

CX/PR 24/55/5 – CL 2024/44-PR

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

1. Inclusion of additional commodities in Class A and Class C

Indonesia agrees with the amendment to the Classification of Food and Feed (Class A and Class C) regarding the new code for tomato ketchup, changing it from CP 0448 to DM 3527

2. Fluazinam (306) ~~(332)~~

Indonesia agrees with the assignment of new ID number 306 to fluazinam

3. Consideration of Guideline Levels (GLs)

Indonesia agrees to convert "GLs" into "MRLs retained at Step 4" for compounds listed in Part III of CX/PR 24/55/5

Agenda Item 8

CX/PR 24/55/7 – CL 2024/46-PR

Management of unsupported compounds without public health concern scheduled for periodic review

(i) Bitertanol, fenthion, and parathion methyl

Indonesia supports this recommendation to revoke all CXLs for bitertanol, fenthion, and parathion methyl

(iii) Dinocap

Indonesia supports the revocation of all CXLs for dinocap with the exceptions of those commodities for which CXLs exist for meptyldinocap

Agenda Item 9

CX/PR 24/55/8 – CL 2024/47-PR

National registrations of pesticides

Indonesia agrees that the results of NRD 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.

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

Indonesia recalls its comment in CL 2024/43-PR and we would like to propose some priority lists of pesticides for evaluation or re-evaluation by the Joint FAO/WHO Expert Meetings on Pesticide Residues (JMPR) as follows:

Indonesia would like to thank the electronic Working Group (eWG) on Priorities chaired by Australia for preparing of CL 2024/43-PR. Indonesia would like to submit the following comments:

B. FINALIZING THE 2025 PROPOSED SCHEDULE**Paragraphs 5 and 6 of CL 2024/43-PR**

Indonesia supports the 2025 proposed schedule 2025-new uses and other evaluations for Fluopyram, Mefentrifluconazole, Trifloxystrobin, Isocyloseram, Cypridinil, Oxathiapiprolin, Fludioxonil, Flupyradifurone, Fosetyl-Al, Isotianil, and Tebuconazole,

Agenda Item 11

CX/PR 24/55/10 – CL 2024/48-PR

Enhancement of the operational procedures of CCPR and JMPR

Indonesia agrees with 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.

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

Indonesia supports three approaches as a mechanism to generate more robust and inclusive recommendations prior to presenting the recommendations to either committee. These approaches include:

- (1) Expressing support for the Joint CCRVDF-CCPR EWG;
- (2) Endorsing the scheduling of a virtual Joint Physical Working Group; and
- (3) Encouraging CCPR delegations to take part in the virtual Joint Physical Working Group. These approaches will facilitate discussions in plenary and lead to a more efficient advancement of the joint EWG work.

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

Indonesia agrees with the proposed approach for conducting extrapolations of tomato and/or pepper data to eggplant.

Due to the exorbitant cost of establishing MRLs, Indonesia has agreed to five residue extrapolation principles based on the following: 1) formulation types are considered comparable in many situations; 2) climate conditions that are deemed to have a minimal impact; 3) a tolerance of 25% Good Agricultural Practices (GAP) is granted; 4) applicable in a proportional manner ranging from 0.3x to 4x the GAP rate; and 5) grouping of crops according to the Codex Classification of Foods and Feeds.