CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 6.1 ,6.2, 6.3, 7, 8.1, 8.2, 9, 10, 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON PESTICIDE RESIDUES

56th Session

Santiago, Chile
8-13 September 2025

Comments submitted by the International Union of Food Science and Technology (IUFoST)

The objective of this Conference Room Document (CRD)[1] is to provide comments on behalf of the International Union of Food Science and Technology (IUFoST), an observer organization of the Codex Alimentarius Commission, on agenda items tabled at the 56th Session of the Codex Committee on Pesticides Residues (CCPR56).

The International Union of Food Science and Technology (IUFoST) represents the largest gathering of food science and technology scientists from around the world, consisting of over 300,000 scientists from more than 100 countries.

Agenda Item 6.1 **CX/PR 25/56/5**

IUFoST commends JMPR for its scientific evaluations and supports the advancement of MRLs to adoption at Step 8, provided that the assessments are complete and transparent.

IUFoST encourages Codex to continue prioritizing commodities of high trade relevance (e.g., rice, citrus, and vegetables) and to ensure consistency in animal burden calculations for fat-soluble pesticides.

IUFoST also emphasizes the importance of ensuring consistency in animal burden calculations, particularly for fat-soluble pesticides, following the updated classification of animal-origin commodities. Alignment with CCRVDF definitions, such as those for “muscle” and “edible offal,” will be essential for clarity use of laboratory results and subsequent actions such as enforcement.

Agenda Item 6.2 **CX/PR 25/56/6**

IUFoST appreciates the efforts of the Codex Secretariat in compiling and reviewing compounds with Codex Maximum Residue Limits (CXLs) established for both milk and milk fat.

This initiative addresses a long-standing implementation gap dating back to CCPR40 (2008), which agreed that for fat-soluble pesticides with MRLs in both matrices, whole milk should be analysed and results assessed based on the MRL for whole milk.

IUFoST supports the Secretariat’s proposal to insert the footnote clarifying that, for fat-soluble pesticides with CXLs in both milk and milk fat, whole milk should be analysed and results should be assessed based upon the MRL for whole milk. This measure enhances regulatory clarity, reduces monitoring inconsistencies, and facilitates trade.

Agenda Item 6.3 **CX/PR 25/56/7**

[1] This CRD was prepared by the Group of Experts of the Global Food Regulatory Science Society (GFoRSS), the Disciplinary Group of the International Union of Food Science and Technology (IUFoST).

IUFoST acknowledges JMPR's scientific position that okra cannot be extrapolated from pepper data and requires its own representative field trials.

IUFoST supports maintaining the temporary inclusion of okra under pepper CXLs to safeguard trade, while urging Members and Observers to generate and submit residue data to JMPR.

IUFoST further suggests that issuing a Circular Letter could help accelerate commitments and provide clear timelines for data generation

Agenda Item 7 **CX/PR 25/56/8**

IUFoST appreciates the efforts of the EWG chaired by India and co-chaired by Canada, Iran, and Singapore in developing the Guidelines for Monitoring the Stability and Purity of Reference Materials and Related Stock Solutions of Pesticides during Prolonged Storage.

These guidelines, to be discussed at step 7, address a critical gap by enabling laboratories to extend the use of costly reference materials (RMs) beyond the stated expiry date when scientifically justified.

IUFoST welcomes the inclusion of Approach 3 to cover mixtures of pesticide reference materials, reflecting actual laboratory practice and strengthening the applicability of the guidelines

IUFoST also recognizes the importance of provisions on the use of internal standards, the reliance on Certificates of Analysis for purity verification, and the updates to ISO references that ensure international traceability and harmonization.

Particularly valuable are the shelf-life extension provisions proposed by the EU, allowing automatic extensions when RMs are stored under more protective conditions (e.g., refrigerated or frozen). This approach is especially beneficial for laboratories in developing countries, where the cost and availability of RMs pose major challenges

IUFoST supports advancing these guidelines to Step 8 and recommends that adoption be accompanied by targeted training and capacity-building initiatives to ensure consistent implementation. Such efforts will ensure consistent application of the protocols across laboratories globally and will maximize the benefits of reduced costs, improved sustainability, and enhanced reliability in pesticide residue monitoring.

Agenda Item 8.1 **CX/PR 25/56/9**

IUFoST appreciates the efforts of the EWG chaired by Chile and co-chaired by Australia, Ecuador, Kenya, and India in preparing recommendations for CCPR56. These discussions concern compounds that have not been reviewed for more than 25 years and are no longer supported by manufacturers, namely fenthion, parathion-methyl, dinocap, methamidophos, amitraz, and bitertanol.

Based on the EWG recommendations, IUFoST supports the following actions:

- Fenthion (39), Parathion-methyl (59), Dinocap (87), Amitraz (122), and Bitertanol (144): Revoke all CXLs, as no Member country or organization has committed to submitting a data package to support a JMPR periodic review.
- Methamidophos (100):
    - Revoke CXLs in commodities such as cottonseed, fodder beet, potato, and sugar, which do not have corresponding acephate CXLs.
    - Retain methamidophos CXLs only for commodities where a corresponding acephate CXL exists, until JMPR can conduct a periodic review of acephate.
    - Request JMPR to revise the residue definition of acephate to include methamidophos during its periodic review.

IUFoST underlines that Codex should remain firm in revoking unsupported CXLs, while adopting risk management provisions for metabolite-linked compounds to avoid unintended regulatory gaps. This balanced approach will provide the necessary regulatory clarity while ensuring Codex standards remain science-based, credible, and trade-facilitating.

Agenda Item 8.2 **CX/PR 25/56/10**

IUFoST recognizes the importance of developing a global database of national registrations to distinguish between supported, discontinued, and orphan pesticides.

IUFoST encourages Codex to strengthen Member participation and consider alternative, streamlined mechanisms for maintaining the database, ensuring resources are focused on compounds of highest global relevance.

Agenda Item 9 **CX/PR 25/56/11**

IUFoST appreciates the efforts of the EWG on Priorities for preparing the updated schedules and priority lists and supports a balanced approach between new compound evaluations and timely periodic reviews.

IUFoST encourages Members to provide national registrations, GAPs, and data support to strengthen nominations, with particular focus on commodities of high trade relevance for developing regions. Linking priority lists with the emerging National Registration Database will further improve transparency and efficiency.

Agenda Item 10 **CX/PR 25/56/12**

IUFoST thanks the Enhancement EWG for its valuable proposals

IUFoST supports short-term measures to reduce the backlog of evaluations, including convening targeted JMPR sessions, improving dossier submission practices, and implementing electronic data submission systems.

IUFoST particularly welcomes the recommendation to develop best-practice guidance for submitters, which will improve dossier quality and reduce inefficiencies.

Agenda Item 11 **CX/PR 25/56/13**

IUFoST thanks the United States as Chair, and Brazil and New Zealand as Co-Chairs, for their leadership of the Joint CCPR/CCRVDF EWG on Dual Use Compounds

IUFoST welcomes the progress in identifying standards and commodities requiring harmonization and acknowledges the challenges of limited participation and separate committee discussions.

IUFoST strongly supports the work of the Joint EWG on dual use compounds and encourages continued collaboration between CCPR and CCRVDF.

IUFoST recommend expanding the use of virtual joint sessions to build consensus earlier, harmonize food descriptors, and align MRLs for dual-use compounds, thereby minimizing duplication and inconsistencies.

Overall Support to the International Scientific Assessment Approach Under JMPR:

IUFoST would like to emphasize that a robust and transparent scientific assessment is the cornerstone of confidence in the safety of pesticide residues in food. The Joint FAO/WHO Meeting on Pesticide Residues (JMPR) provides this essential function through internationally recognized, rigorous evaluations of toxicological data and dietary exposure. While scientific debate is both necessary and constructive, it is critical that the scientific opinions issued by JMPR be acknowledged as the authoritative source of advice underpinning the establishment of Codex Maximum Residue Limits (MRLs) for pesticides. Such recognition ensures consistency, credibility, and trust in the global food safety system, while safeguarding consumer health and facilitating fair practices in food trade.