DRAFT

U.S. POSITIONS

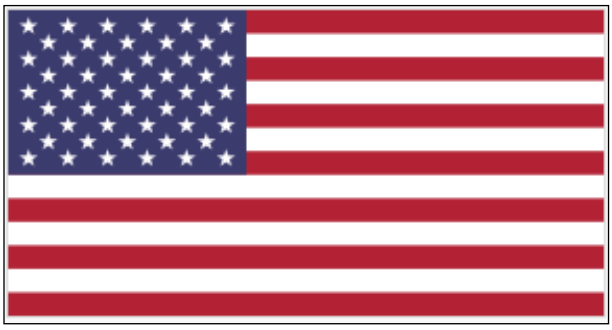
FOR THE

56TH SESSION OF THE

CODEX COMMITTEE ON PESTICIDE RESIDUES

September 8 to 13, 2025

SANTIAGO, CHILE



Draft Positions

Date prepared August 13, 2025

These positions may be revised or updated prior to the Committee session.

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Agenda Item 1: Adoption of the agenda

Documents:

CX/PR 25/56/1

Background:

The 56th Session of the Codex Committee on Pesticide Residues (CCPR56) will consider the adoption of the agenda.

U.S. Position:

The United States supports the adoption of the agenda as currently written.

Agenda Item 2: Appointment of rapporteurs

Documents:

CX/PR 25/56/1

Background:

The CCPR will appoint rapporteur(s) that are responsible for drafting the CCPR56 report.

U.S. Position:

The United States supports this action and intends to volunteer a member of the U.S. Delegation to act as a rapporteur for the session.

Agenda Item 3: Matters referred to CCPR by CAC and/or other subsidiary bodies

Documents:

CX/PR 25/56/2

Background:

The document provides summary information from the Codex Alimentarius Commission (CAC) and other Codex committees and groups that are relevant to CCPR.

MATTERS ARISING FROM THE 47TH SESSION OF THE CAC (CAC47, NOVEMBER 2024) AND 86TH AND 87TH SESSION OF THE EXECUTIVE COMMITTEE (CCEXEC86, JULY 2024 AND CCEXEC87, NOVEMBER 2024)

CAC47 addressed several specific matters pertaining to the adoption of pesticide standards and issues related to the work of CCPR and provision of scientific advice from JMPR:

- CAC47 adopted:
    - Maximum Residue Limits (MRLs) for different combinations of pesticide/commodity(ies) at Step 5/8.
    - Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage at Step 5.
    - Additional consequential amendments to the Codex MRLs for the peppers group/subgroup to provide MRLs for okra, martynia, and roselle.
    - Consequential amendment to include a new commodity and associated commodity code in Class D— Processed Foods of Plant Origin of the *Classification of Food and Feed* (CXA 4-1989).
- CCEXEC and CAC47 also discussed the FAO and WHO disagreement on its dietary exposure assessment methodology and raised concerns about the late publication of the 2024 JMPR Report and postponement of CCPR56 from May 2025 to September 2025. These issues will be discussed in more detail as part of CCPR56 Agenda Item 5(a).

CCEXEC and CAC47 also discussed several **general matters** that impact CCPR and other Codex committees:

- **Model for Future Codex Work**: CCEXEC86 emphasized the importance of retaining the Model for future Codex work as a reference document. Updates will be prepared by the Codex Secretariat to help identify issues that require further consideration by CCEXEC, CAC, or the Codex Committee on General Principles (CCGP).
- **Guidelines for New Work Proposals**: CCEXEC87 supported the development of guidelines to assist members in creating new work proposals. These guidelines should encourage the development of group commodity standards and facilitate the expansion of existing standards by incorporating similar products.
- **Codex EWGs Handbook**: CCEXEC73 recommended that the Codex Secretariat develop a comprehensive handbook on electronic working groups (EWGs). This handbook has been

published and is available at: https://openknowledge.fao.org/items/aee7614e-d630-4665-a98c-74adcc4d3040.

- **Codex Strategic Plan 2026-2031**: CAC47 adopted the Codex Strategic Plan for 2026-2031, with a monitoring framework presented by the Codex Secretariat at CCEXEC88 (July 2025) for review. The framework, once agreed upon by CCEXEC89 (November 2025)with revisions, will be reviewed biennially, with feedback sought from members and observers to refine it further before submission for approval by CAC48 in 2025.
- **Monitoring Codex Texts**: CAC47 continued its work on developing a mechanism to monitor the use and impact of Codex texts, involving annual surveys, case studies, and collaboration with the World Trade Organization (WTO). Reports of a similar 2023 survey on the use and implementation of Codex and other standards is available at: https://openknowledge.fao.org/items/e57dc773-117b-4a37-aa70-2cdb8b3339c2.

MATTERS ARISING FROM OTHER SUBSIDIARY BODIES

Matters for Information

The document summarizes information on other Codex committees that relates to the work of CCPR:

Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF)	***Environmental inhibitors:*** • CCRVDF27 (2024) agreed to include bromoform, an environmental inhibitor compound, for ruminant tissues and milk in the priority list for evaluation by the Joint FAO/WHO Expert Committee on Food Additives (JECFA). CAC47 members also provided general support of FAO's work on environmental inhibitors.
Codex Committee on Methods of Analysis and Sampling (CCMAS)	***Information document for the Guidelines on sampling (CXG 50-2004)*** • CCMAS39 (2018) agreed to revise the *Guidelines on sampling* (CXG 50-2004) as the Guidelines were difficult to understand, thus a revision was necessary to simplify and make it more readable and understandable. The revised Guidelines aim to assist those responsible for selecting statistical sampling plans that are suitable for inspections under specifications established by Codex standards. • CCMAS44 (2025) agreed to inform all Codex committees that the "Information document for the Guidelines on sampling (CXG 50-2004)" will be published on the Codex website.
Codex Committee on Contaminants in Food (CCCF)	***Evaluation of ethylene oxide (EtO) and 2-chloroethanol (2-CE)*** • CCCF18 agreed to retain these compounds in its priority list for evaluation by JECFA.

Matters for Action

Codex Committee on General Principles (CCGP)	***Codex Procedural Manual: Review of inconsistencies in language and superseded content*** • The Codex Secretariat informed CCGP32 (2021) about developing a digital, user-friendly Procedural Manual (PM) to ensure up-to-date content and easy search. • At CCGP34 (2025) members emphasized the need for Section 4.8 (Risk Analysis Principles by CCPR) to be clear and consistent with Section 2 (Elaboration of Codex

	standards and related texts) and agreed that CCPR should review (See Part 1 of Appendix I of CX/PR 25/56/2) • The Codex Secretariat assessed the comments and suggested follow-up actions (See Part 2; specific comments to this assessment are reproduced in Part 3). • CCPR56 will consider comments on revisions to Section 4.8, including the Secretariat's evaluations. The amendments aim to enhance language consistency and remove/update outdated content without altering the Risk Analysis Principles applied by CCPR. • CCPR56 should focus on ensuring consistency in the wording of the Risk Analysis Principles, rather than undertaking a substantive revision or comprehensive overhaul of the principles themselves.

U.S. Position:

The United States will make interventions if warranted on the Matters for Information outlined above. With regard to the Matter***s*** for Action related to CCGP and Section 4.8, the United States provided edits to CCGP34 (2025) as found in Appendix 1 of the document, notably regarding the specified dates in the PM related to the priority list and the JMPR Report availability. The Codex Secretariat's proposal at CCGP34, although not formally discussed in plenary, was to retain the PM text ***since*** in their view, the dates were indicative and maintained flexibility. The United States would prefer to update the text to reflect current practices but would also be fine with retaining the existing text ***if CCPR56 prefers that.***

Agenda Item 4(a): Matters arising from FAO and WHO

Documents:

CX/PR 25/56/3

Background:

The document provides updates on the joint FAO/WHO meetings on pesticide management and specifications:

The FAO/WHO Joint Meeting on Pesticide Management (JMPM), held in October 2024 in Rome, recommended expediting the development of guidance on risk communication and revising existing guidelines, such as those for empty pesticide containers and pesticide resistance monitoring. The meeting also proposed developing guidance for minor pesticide use and online pesticide sales and endorsed guidance on pesticide phase-out options, illegal trade, and data requirements for pesticide registration.

The FAO/WHO Joint Meeting on Pesticide Specifications (JMPS), held in June 2024 in the Netherlands, evaluated 12 FAO specifications, 20 WHO specifications and six FAO/WHO specifications. The meeting also advanced work on guidance documents, including revisions to operational manuals for chemical pesticide specifications and the development of a manual for microbial pesticide specifications.

The document also provided information on recent FAO and WHO reports and workshops:
FAO released a report entitled, "Food safety implications from the use of environmental inhibitors in agrifood systems." The report explores food safety implications of environmental inhibitors, which are substances used to enhance crop and livestock production efficiency while reducing environmental impacts.

FAO co-sponsored an international workshop on feed risk assessment, focusing on chemical safety, in March 2025 in the Netherlands. Participants discussed developments in feed risk assessment since the previous workshop in 2013, such as improved transfer models and harmonized feeding regimes. FAO plans to launch a manual on feed risk assessment later in 2025 to help harmonize methodologies globally.

WHO held a workshop entitled, "New Approach Methodologies (NAMs) in Future Food Safety Risk Assessment" in Singapore in June 2025. The workshop aimed to foster global collaboration to the adoption and implementation of NAMs. As a follow-up, WHO's International Programme for Chemical Safety will update its manual to include guidance on NAMs.

U.S. Position:

The document provides general information on FAO and WHO activities that are broadly related to CCPR's evaluation of pesticides. It is not anticipated that the discussion of these activities will require specific direction from CCPR, but the United States will if warranted.

Agenda Item 4(b): Matters arising from other international organizations

Documents:

CX/PR 25/56/4

Background:

The document provides updates from FAO and the International Atomic Energy Agency (IAEA) on activities relevant to CCPR that include technical projects, capacity building, and data generation.

- In 2024, the Joint FAO/IAEA Centre of Nuclear Techniques in Food and Agriculture provided **technical support and capacity building** to more than 80 technical cooperation projects and trained over 500 food safety scientists. Its work strengthens laboratory capacities through support to regional networks that include the Latin American and Caribbean Analytical Network (RALACA), the African Food Safety Network (AFoSaN), and an Asian food safety network. The Joint FAO/IAEA Centre also called attention to an AFoSaN workshop held in Morocco in October 2024, attended by 150 participants from 32 African countries, USDA and FDA, international organizations and industry representatives. The next event is planned for Côte d'Ivoire in mid-2026.
- In **analytical laboratory support**, the Joint FAO/IAEA Centre continues to support member country requests related to analytical methods, standard operating procedures and technical guidance. Food Safety and Control Laboratory (FSCL) in Austria developed and validated a multiresidue analytical method to detect a wide range of pesticides and mycotoxins in maize and cassava. Joint FAO/IAEA Centre reports that the method showed improved recoveries, excellent reproducibility, and reduced matrix effects, making it a robust tool for routine monitoring in complex food matrices.
- The Joint FAO/IAEA Centre also supported **data generation** for establishing MRLs in Africa for minor uses. Supervised field trials targeting pesticides in okra and chilli pepper are ongoing in Ghana, Kenya, and Senegal, with a regional training course held in Ghana in May 2025 to build technical capacity in conducting Good Laboratory Practice-compliant field trials. Additional training events included an Asia-Pacific meeting in China in August 2024 on proficiency testing and multiclass food hazard surveillance, and an advanced regional course in Qatar in October 2024 on isotopic confirmatory techniques for pesticide residues.

U.S. Position:

The document provides general information on activities of the Joint FAO/IAEA Centre that are broadly related to CCPR's evaluation of pesticides. It is not anticipated that the discussion of these activities will require specific direction from CCPR, but the United States will make interventions if warranted.

Agenda Item 5(a): Report on items of general consideration arising from the 2024 JMPR meeting

Documents:

Section 2 of the 2024 JMPR Report

Background:

Section 2 of the 2024 JMPR Report provides a summary of JMPR deliberations on general scientific and operational topics that may impact JMPR's evaluation procedures and review schedule. These are generally informational, but the United States has developed a more detailed position on developments in JMPR's dietary exposure methodology (*Item 2.1*) and will make interventions on this and other topics if warranted.

2.1 Developments in dietary exposure methodology for pesticide residues in foods

JMPR has been exploring whether it is appropriate to change its dietary exposure assessment method and transition from its current International Estimated Daily Intake (IEDI) methodology to an alternative approach called the Global Estimate of Chronic Dietary Exposure (GECDE). GECDE was developed by a FAO/WHO expert working group and intended to support chronic exposure assessments based on the FAO/WHO Chronic Individual Food Consumption (CIFoCo) database. This consumption database contains food consumption information that allows for consideration of population subgroups and exposure distributions.

In 2023, JMPR agreed to transition to the use of the GECDE-mean approach that relies on mean consumption estimates and explore the use of the GECDE-high approach that uses high-end consumption estimates in the assessment of chronic and less-than-lifetime dietary exposure. Given the importance of these changes, CCPR55 (2024) requested that the 2024 JMPR provide more information "about the uncertainty associated with the degree of conservatism and transparency of the GECDE methodology by comparison to the IEDI."

The 2024 JMPR Report provides a comparison of IEDI and GECDE-mean and -high approaches. Limited information is provided to fully evaluate the comparison methodology, but JMPR concluded that GECDE dietary exposure estimates "closely aligned with those based on dietary survey data for individuals." Additionally, JMPR reported on the sufficiency of two days of consumption data and whether the IEDI approach is able to account for regional diets that can be used to characterize dietary patterns within individual countries.

JMPR 2024 concluded by making the following recommendations:

- The GECDE methodology has been sufficiently well validated to establish its fitness for purpose for use by the JMPR in estimating chronic and less-than-lifetime dietary exposure to residues of pesticides."
- A supporting analytical tool and documentation is needed to enable organizations outside of JMPR to use the GECDE methodology.
- JMPR proposed a timeline that included requesting input from CCPR56 and including the GECDE mean and high estimates in the 2025 JMPR Meeting.

While the 2024 JMPR Report made these conclusions, JMPR also indicated that the pesticide residue experts present at the meeting expressed their dissent against Section 2.1 because of the following concerns:

- JMPR's analysis of the GECDE-high model was insufficient to justify adoption.
- The GECDE-high methodology overestimates long-term exposure relative to JMPR's current method and may result in an unrealistic overestimation of risk.
- More detailed information documentation is needed on the model, data sources, underlying assumptions, and model output.

The United States anticipates that CCPR will have substantive discussion on JMPR's recommendations on "*Developments in dietary exposure methodology for pesticide residues in foods."* The full U.S. Position is found further below.

2.2 Consideration on recommendation of group maximum residue limits for pulses

The 2023 JMPR received data for the use of acetamiprid on various pulses. When reviewing the data, significant differences in residue levels following good agricultural practice (GAP) treatment were identified between the genera of Phaseolus or Vigna and soya beans, and the meeting decided not to combine the data across these crops. The 2024 JMPR re-evaluated this data and incorporated their analysis in their evaluation of acetamiprid.

2.3 Extrapolation of recommendations for tomato and pepper to eggplants (subgroup)

The 2018 JMPR determined that it is appropriate to extrapolate residue estimates from peppers to eggplant, provided similar critical GAPs existed for both groups of commodities. Based on this determination, an observer group conducted an analysis of existing Codex MRLs (CXLs) for both tomato and pepper for establishing corresponding eggplant CXLs.

JMPR 2024 reviewed this observer analysis and provided technical comments on whether the proposed analysis and MRL recommendations can be adopted by JMPR.

2.4 Transition from commodity of meat to commodity of muscle and fat

JMPR agreed to update its commodity definitions to reflect CCPR's revision of the Classification of Food and Feed (CXA 4-1989), which includes the revised Class B on primary food commodities of animal origin. The revised Class B incorporates new definitions for the terms "meat", "muscle", "fat" and "edible offal" to facilitate harmonization of MRLs between CCPR and the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF).

2.5 Interpretation of use patterns for targeted applications

The meeting addressed making residue recommendations based on trials that align with critical Good Agricultural Practice (GAP). Issues arise when products are applied directly to specific crop areas, affecting residue distribution and sample collection. Precision agriculture also presents similar challenges. Sampling should account for maximum residue levels and the blending of harvested crops, which varies by type, such as ground-collected almonds versus handpicked peaches. JMPR advises regulatory authorities and others (e.g. OECD) to consider these factors when updating field trial guidelines.

2.6 Update of the pesticide residues in food: guidance document for WHO JMPR monographers and reviewers

JMPR draft updates to the guidance document for WHO monographers and reviewers on procedures, scientific and style guidance were prepared, presented and discussed at the meeting. A revised draft of the document will be circulated for comments among members of the WHO Core Assessment Group after the JMPR 2024 Meeting.

2.7 Strategy and timing for JMPR re-evaluation of dithiocarbamates

JMPR will re-evaluate five dithiocarbamates, including their metabolites, and has outlined a phased approach due to the expected volume of data and similarities between compounds. Each phase must be completed before starting the next.

- **Phase 1** will cover mancozeb, metiram, and their common metabolite ethylenethiourea (ETU), with a workload equivalent to four to five standard evaluations.
- **Phase 2** will focus on propineb and its metabolite propylenethiourea (PTU), requiring the workload of two standard evaluations.
- **Phase 3** will address ziram and thiram, also equivalent to two standard evaluations.

JMPR's full periodic review resource allocation may be needed for Phase 1, while Phases 2 and 3 together will require a similar level of resources. Depending on other priorities, a phase may not be completed in a single JMPR session, and subsequent phases might not be addressed in the next meeting. JMPR also indicates that FAO residue evaluation for all compounds should be during Phase 3 so that residue issues are considered for all compounds together.

2.8 Linear and non-linear toxicokinetics guide progress update

A first draft of the JMPR guidance for the interpretation and use of toxicokinetic data to support the determination of health-based guidance values has been completed. Further refinement of the guidance is required before presenting it for discussion at the 2025 JMPR.

2.9 Data on pesticide metabolites that are also commodity chemicals

JMPR assesses the dietary risk of pesticide residues, including metabolites and degradation products, using a systematic approach. This process requires sponsors to submit all available toxicology data. While compliance is generally good for pesticide-specific metabolites, it is often lacking for low molecular weight products, which are commonly traded as commodities or are common breakdown products. These products, such as trifluoroacetic acid and phthalic acid, often have data generated independently of the pesticide sponsors. Despite this, such information is crucial for JMPR's assessments. Sponsors should seek out and submit relevant data for dietary risk assessments, even if they are not the data owners, to ensure a comprehensive review by JMPR.

2.10 Efficiency of JMPR resources

JMPR has consistently urged sponsors to submit chemical dossiers that meet the quality and scope outlined in the CCPR Risk Analysis Principles. However, the current meeting received several dossiers for both new and periodic review compounds that lacked essential residue and toxicology data necessary for establishing health-based guidance values and conducting dietary risk assessments. Often, additional uses for the same compound are submitted later, requiring a reevaluation of residue definitions and

straining JMPR's capacity. To address these issues, JMPR will prioritize reviewing dossiers that cover multiple registered uses with expected measurable residues and are complete with all required data as specified in their call for submissions.

U.S. Position:

The United States anticipates that CCPR will have substantive discussion on JMPR's recommendations on 2.1 "*Developments in dietary exposure methodology for pesticide residues in foods."*

For the remaining General Considerations, it is not anticipated that the activities will require specific direction from CCPR. The United States will make interventions if warranted.

2.1 Developments in dietary exposure methodology for pesticide residues in foods

At CCPR55 (2024), the committee raised concerns about JMPR's 2023 recommendations on the adoption of the GECDE methodology to assess dietary exposure to pesticides. These concerns recognized that the selection of a dietary method is a scientific judgement but called attention to the importance of establishing a transparent evaluation process that enables Codex stakeholders to provide feedback and address CCPR's risk management considerations. The United States' previous concerns are included in the CCPR55 Report (Paragraph 30, REP24/PR55) and summarized below:

> *A Member supported the JMPR's general working principles to (i) base its risk assessments on realistic exposure scenarios that consider susceptible and high-risk groups, (ii) improve the characterization of chronic risk from less than lifetime exposure, and (iii) work to harmonize JECFA and JMPR assessment methodologies. Beyond these scientific considerations, it was also critical that changes to JMPR's methodology be done transparently so that CCPR and other stakeholders understand the robustness of the proposed approach and its impact on risk management. Given that JMPR intends to further investigate the degree of conservatism in the GECDE (mean and high) in comparison with the current international estimate of dietary intake (IEDI) methodology, the Delegation believed that JMPR should coordinate more closely with CCPR to determine if it is appropriate to transition from the use of the IEDI to the use of GECDE-mean. This should be done transparently and give CCPR and other stakeholders an opportunity to provide input.*

Other CCPR55 delegations expressed similar concerns about JMPR's transparency and indicated that the GECDE methodology is *"understood by only a limited number of experts."* These delegations indicated that "*CCPR, as the risk manager, needed time to evaluate the implementation of GECDE-mean and required the calculation spreadsheets to be able to assess and review the calculations critically."* Concerns were also raised that JMPR has not provided information on the impact of the change from the IEDI to GECDE-mean and not provided sufficient information on the degree of conservatism associated with both the IEDI and GECDE-mean methodology.

In addition to the transparency concerns raised by CCPR, JMPR's pesticide residue experts are primarily responsible for performing dietary exposure assessments and expressed a dissenting opinion about the recommendations provided in Section 2.1 of the JMPR 2024 Report. The JMPR 2024 Report provides insufficient information on this dissenting opinion. This raises further questions about the transparency of JMPR's evaluation process and whether it is appropriate to implement

The United States believes that it is inappropriate to adopt the recommendations provided in *Section 2.1* of the JMPR 2024 Report because JMPR has been unable to address the transparency concerns raised by CCPR and has provided insufficient information on the dissenting opinion provided in Annex 10 of the JMPR 2024 Report. In order to make recommendations on whether it is appropriate to transition from the IEDI to the GECDE methodology, JMPR must first establish a stepwise, transparent, and deliberative process in consultation with CCPR to confirm that there is consensus that the change is needed, the methodology is scientifically robust, and risk management issues on apparently considered. CCPR should request that JMPR outline a clear path forward to advance the issue and propose the following next steps:

Proposed Timeline for CCPR and JMPR Collaborative Effort on Dietary Exposure Assessment Methods (2026-2029)

2026	**CCPR57**	• **Scoping:** JMPR Secretariats outline general approach, form a transparent working group comprising WHO and FAO experts, and assess the need for additional expertise. • **Initial Discussions:** CCPR and JMPR Secretariats engage in preliminary discussions on the path forward.
	JMPR 2026	• **JMPR Concept Paper:** Develop a paper detailing the IEDI and GECDE methodologies and rationale for potential revisions. • **Draft Benchmarking Protocol:** Create a protocol to compare both methodologies, including a probabilistic dietary exposure assessment using the best available data on pesticide residues and food consumption.
	CCPR58	• **Deliberation on Concept Paper and Draft Protocol:** Provide feedback on the draft discussion paper and proposed protocol.
	JMPR 2027	• **Refine Protocol and Perform Benchmarking:** Address CCPR feedback, refine the comparison protocol, and conduct a preliminary benchmarking assessment.
	CCPR59	• **Feedback on Assessment:** Offer feedback on the preliminary benchmarking assessment conducted by JMPR.
	JMPR 2028	• **Finalize Benchmarking and Recommendations:** Incorporate CCPR feedback and prepare the final discussion paper, including the complete benchmarking assessment, conclusions on the IEDI and GECEDE approaches, and recommendations for changes.
	CCPR60	• **Final Deliberation:** Review JMPR's conclusions and recommendations, and if necessary, draft changes to Codex risk analysis principles to update JMPR's methodology.
	CAC	• **CAC Endorsement and Implementation:** Approve changes to risk analysis principles, facilitating updates to JMPR's methodology.

Agenda Item 5(b): Report on responses to specific concerns raised by CCPR arising from the 2024 JMPR meeting

Documents:

Section 3 of the 2024 JMPR Report

Background:

No specific concerns were raised by the 55th session of the CCPR.

U.S. Position:

A U.S. position is not warranted because there were no specific concerns that required a response from JMPR. However, if additional issues are raised the United States will intervene where appropriate.

Agenda Item 6.1: MRLs for pesticides in food and feed (at Steps 7 and 4)

Documents:

CX/PR 25/56/5

CX/PR 25/56/5-Add.1 - Comments at Step 3 in reply to CL 2025/35-PR (Deadline for comments 8/25)

Section 4 of the 2024 JMPR Report

Background:

JMPR 2024 evaluated 6 new compounds, 25 new uses of existing compounds, and 6 compounds that were re-evaluated as prescribed by CCPR's periodic review program, for toxicity or residues, or both.

JMPR established acceptable daily intakes (ADIs) and acute reference doses (ARfDs), estimated supervised trials median residue (STMR) and highest residue (HR) levels as a basis for estimating dietary exposures, and recommended MRLs for consideration by CCPR and subsequent adoption by CAC. It also estimated dietary exposures (both acute and long-term) to the pesticides reviewed and, on this basis, performed a dietary risk assessment in relation to the relevant ADI and where necessary, the ARfD. Cases in which ADIs or ARfD may be exceeded are clearly indicated to facilitate decision-making by CCPR.

A list of compounds is summarized below:

New Compounds		
1. Acynonapyr	3. Cyclobutrifluram	5. Fluazinam
2. Carfentrazone-ethyl	4. Fenpropidin	6. Fluoxapiprolin
New Uses		
1. Acetamiprid	10. Florpyrauxifen-benzyl	18. Novaluron
2. Acibenzolar-S-methyl	11. Flubendiamide	19. Phosphonic
3. Azoxystrobin	12. Flupyradifurone	20. Propiconazole
4. Buprofezin	13. Fosetyl aluminium	21. Pydiflumetofen
5. Chlormequat	14. Hexythiazox	22. Spinosad
6. Cyproconazole	15. Lambda-cyhalothrin	23. Tebuconazole
7. Etofenprox	16. Maleic hydrazide	24. Tebufenozide
8. Fenpyroximate	17. Methoprene	25. Tetraniliprole
9. Fipronil		
Periodic Reviews		
1. Chlorpyrifos	3. Folpet	5. Phosmet
2. Ethoxyquin	4. Permethrin	6. Prochloraz

U.S. Position:

The United States generally supports the MRL recommendations from JMPR 2024. The United States does not intend to submit any concern forms at CCPR56.

Agenda Item 6.2: CXLs for milk and milk fat

Documents:

CX/PR 25/56/6

CX/PR 25/56/6-Add.1 - Comments in reply to CL 2025/36-PR (CL not yet issued)

Background:

At CCPR55 (2024), the Codex Secretariat informed the committee that the Codex Pesticide MRL Database needs to be updated to reflect the following CCPR40 (2008) decisions concerning CXLs for milk and milk fat:

- Fat-soluble pesticides with MRLs established for both milk and milk fat: for regulation and monitoring purposes, whole milk should be analyzed and the result compared with the MRL for whole milk.
- Request that JMPR insert a note to this effect alongside the MRL for whole milk in all cases where MRLs were established for both milk fat and whole milk.

CCPR56 is now requested to:

- confirm the decision taken by CCPR40 to insert a note "for monitoring and regulatory purposes, whole milk is to be analysed, and the result compared to the MRL for whole milk" to the CXLs for milk in the Codex database in all cases where CXLs are established for fat-soluble pesticides in both milk and milk fat; and
- Reiterate its request to JMPR to insert this note alongside the MRL for whole milk in all cases where MRLs were established for both milk fat and whole milk for fat-soluble pesticides.

U.S. Position:

The United States supports the recommendations to update the Codex Pesticide MRL database and reiterate its request to JMPR.

Agenda Item 6.3: MRLs for okra

Documents:

CX/PR 25/56/7

CX/PR 25/56/7-Add.1 - Comments in reply to CL 2025/37-PR **(CL not yet issued)**

Background:

At CCPR53 (2022), advice was sought from JMPR on setting or extrapolating MRLs for okra, following concerns that sweet and chili peppers might not be suitable representatives according to the guidelines set in the *Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups* (CXG 84-2012). In 2023, CCPR54 reviewed JMPR's feedback on creating Subgroup 12D Okra, with okra as the representative crop. Delegates raised concerns about the difficulties of generating field trial data for MRL establishment, particularly for developing countries, which could lead to trade barriers. Despite exploring alternatives, such as maintaining current groupings or using chili pepper as a representative commodity, consensus was not reached. Thus, CCPR54 retained the existing classification of okra in CXG 84-2012 and the *Classification of Foods and Animal Feeds* (CXA 4-1989), agreeing to evaluate countries' commitments to generate data for assessment by JMPR 2024.

To mitigate potential trade impacts, CCPR54 provisionally removed the exclusion of okra, martynia, and roselle from MRL entries in the Codex database, facilitating trade while awaiting field residue trial data for JMPR evaluation. The Committee stressed the importance of generating trial data to resolve uncertainties and complete JMPR's assessment. Supporters of JMPR's analysis emphasized the need for data submission, reaffirming the decision to review data generation commitments at CCPR55 in 2024. The Global Pulse Confederation pledged to support data collection for okra, identifying relevant pesticide compounds for field trials.

CCPR56 may consider recommending extending the current CXLs for the pepper subgroup to include okra, martynia, and roselle, depending on updated information from Codex members on data availability and commitments to generate data for JMPR evaluation.

U.S. Position:

The United States supports the extension of the CXLs for the pepper's subgroup (VO 0051) to okra, martynia. The United States is not currently planning to generate data for evaluation but understands that other Codex members and observers are planning to conduct studies to support JMPR's evaluation.

Agenda Item 7: Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage (at Step 7)

Documents:

CX/PR 25/56/8

CX/PR 25/56/8-Add.1 - Comments at Step 6 in reply to CL 2025/38-PR (Deadline for comments 8/25)

Background:

At CCPR52 (2021) Argentina and India presented a discussion paper on monitoring the purity and stability of certified reference materials (CRMs) during prolonged storage. CCPR agreed to establish an EWG, chaired by India and co-chaired by Argentina, with Terms of Reference (TORs):

i. To further develop the discussion paper to consider the need, feasibility and relevance:
ii. To develop a proposal for harmonized guidelines/an analytical protocol on the monitoring of purity and stability of CRMs and stock solutions of multi-class pesticides during prolonged storage, including intermediate and working standards.
iii. To develop harmonized criteria for the use of CRMs and stock solutions beyond the expiry date as per certified analysis.

At CCPR53 (2022), the committee agreed to re-establish the EWG, chaired by India and co-chaired by Argentina and Iran, to refine the discussion paper and develop a proposal for new work. At CCPR54 (2023) agreed to begin new work and re-establish the EWG, chaired by India and co-chaired by Singapore and Argentina, to develop the guidance ahead of CCPR55 (2024).

The draft guidance document was circulated by the EWG chairs, and at CCPR55 the committee revised the document in two in-session working groups. Some members suggested including mixtures of standards but there was insufficient time to complete those changes. CCPR agreed to advance the guidance document to Step 5 to await additional changes to the sections that referred to mixtures, to inform CAC and CCEXEC about the changes to the initial TOR, and to re-establish the EWG.

U.S. Position:

The United States has supported this work since the initial proposal and appreciates that additional time was allotted to more thoroughly consider the changes discussed at CCPR55. Two versions of the draft guidance were circulated by the EWG chairs this year. The United States submitted comments on both drafts to improve the technical accuracy and clarity of the document. The United States will support a recommendation for final adoption at CCPR56 if the work is to be advanced as presented.

Agenda Item 8(a): Management of unsupported compounds without public health concerns scheduled for periodic review

Documents:

CX/PR 25/56/11

CX/PR 25/56/11-Add.1 - Comments in reply to CL 2025/39-PR (Deadline for comments 8/25)

Background:

In the CCPR prioritization process, an unsupported compound is a pesticide that is due for re-evaluation (i.e., periodic review) for which neither a Codex Member or Observer, nor a manufacturer, has committed to submit the data required for evaluation by the JMPR. There is a growing number of compounds that qualify for periodic review, so CCPR has had ongoing discussion about how to manage the list of compounds and prioritize for re-evaluation by JMPR.

CCPR50 (2018) established an EWG that prepared a discussion paper on the management of unsupported compounds for deliberation at CCPR51 (2019). CCPR51 was unable to reach consensus on the management options and noted that there were divergent viewpoints on the management of unsupported compounds without public health concerns. The EWG continued to discuss how to manage unsupported compounds at CCPR52 (2021) and CCPR53 (2022). This resulted in the development of a management approach that was adopted by CCPR54 (2023) and provided in the report of the session (REP23/PR54-Appendix XII).

The EWG is now responsible for managing unsupported compounds according to REP23/PR54-Appendix XII and has made the following recommendations on compounds that were designated as unsupported at CCPR55 in 2024:

CXLs for fenthion (39), parathion-methyl (59), dinocap (87), amitraz (122), and bitertanol (144)

i. To revoke all CXLs for fenthion (39), parathion-methyl (59), dinocap (87), amitraz (122), and bitertanol (144).

CXLs for methamidophos (100)

ii. To revoke CXLs for methamidophos (100) in cottonseed, fodder beet, potato, and sugar as these commodities do not have corresponding CXLs for acephate (95).

iii. To retain all methamidophos CXLs for which there is a corresponding acephate CXL until the JMPR conducts the periodic review of acephate (95)

iv. To recommend that JMPR revise the residue definition of acephate (95) to include methamidophos (100) when conducting the periodic review of acephate.

U.S. Position:

The United States supports the recommendations to revoke fenthion (39), parathion-methyl (59), dinocap (87), amitraz (122), and bitertanol (144). These compounds are not currently registered in the United States. The United States supports the recommendations to revoke CXLs for methamidophos (100) for commodities that do not have corresponding CXLs for acephate (95).

Agenda Item 8(b): National registrations of pesticides

Documents:

CX/PR 25/56/10

CX/PR 25/56/10-Add.1 - Comments in reply to CL 2025/40-PR (Comments due 8/27)

Background:

There has been ongoing discussion since CCPR48 (2016) on the development of a national registration database (NRD) that can be used by Members to determine the global registration status of unsupported compounds. Since then, Germany has chaired an EWG that has developed an initial approach to collect structured information from CCPR members and further refined its approach based on feedback from EWG participants and CCPR.

CCPR55 (2024) continued to support work on the development of the NRD and agreed to transfer the work to the EWG on unsupported compounds with the following terms of reference:

i. continue developing the NRD with compounds that will go to Table 2B (compounds that have been evaluated 15 years ago or more but have not yet been scheduled or listed for periodic review) of the priority list each year; and
ii. consider compounds listed in Group 3 (compounds that in 2023 reached 15 - 19 years since their last periodic review) to seek support for their periodic review.

For CCPR56, the EWG focused on compounds moved to Table 2B of the periodic review list. This includes pesticides last evaluated 15 years ago or more, but not yet scheduled or listed for periodic review. Those compounds last received their JMPR complete toxicological evaluation in 2008 or 2009.

The EWG concluded that participation in database generation is low and may not have sufficient geographic representation. The EWG recommends suspending future work and resuming it on an ad hoc basis when considering support for unsupported compounds without public health concerns.

U.S. Position:

The United States generally supports work on the NRD but agrees with the recommendation to suspend development. The United States will support ad hoc requests that support CCPR decision making on unsupported compounds without public health concerns.

Agenda Item 9: Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR

Documents:

CX/PR 25/56/11

CX/PR 25/56/11-Add.1 - Comments in reply to CL 2024/89-PR and CL 2025/44-PR (Comments due 8/20)

Background:

The schedule and priority list of pesticides for evaluation/re-evaluation is managed by an EWG chaired by Australia. The EWG is responsible for developing the list according to the CAC Procedural Manual "Risk Analysis Principles Applied by the Codex Committee on Pesticide Residues (CCPR)". The current list includes pesticides scheduled for evaluation for 2025 and proposed priorities for 2026 and beyond.

JMPR 2025	The Schedule of Evaluations by the 2025 Joint FAO/WHO Expert Meetings on Pesticide Residues (JMPR) is closed and is not requesting additional nominations.
JMPR 2026	***New Compounds:*** Two compounds are currently included on the schedule/priority list and have national registration confirmation. ***New Uses:*** 27 nominations for new uses or other evaluations. It is likely that only the first 20 compounds can be evaluated in one year. Evidence of product labels/national registration has been provided for the top 20 compounds. The seven compounds not included in the top 20 are identified as '2026 RESERVE' compounds. ***Periodic Reviews:*** 7 compounds in the proposed 2026 Schedule of Periodic Reviews. Support has been confirmed for two compounds, indoxacarb (216) and maleic hydrazide (102). Member countries and observer organizations are requested to confirm support for carbaryl (008), methyl bromide (52), disulfoton (74), pirimiphosmethyl (86) and flumethrin (195).
JMPR 2027 and beyond	***New Compounds:*** Nomination include 3 for JMPR 2028, and 1 for JMPR 2031. Evidence of registration has not yet been provided for these compounds. To date, no new compounds have been nominated for JMPR evaluation in 2027. ***New Uses:*** 20 compounds have new use nominations, including 15 for 2027 and five for 2028. 7 compounds nominated for 2027 have provided evidence of registration. ***Periodic Review:*** Support has been confirmed for five compounds included on the 2027 periodic review priority list. Member countries and observer organizations are requested to provide advice regarding support for the remaining compounds included on the 2027, 2028 and 2029 periodic review priority list.

U.S. Position:

The United States has reviewed and supports the proposed schedules and priority lists of pesticides provided in CL 2024/44-PR. The schedules and priority lists are consistent with United States' nominations that were submitted to the EWG.

Agenda Item 10: Enhancement of the operational procedures of CCPR and JMPR

Documents:

CX/PR 25/56/12

CX/PR 25/56/12-Add.1 - Comments in reply to CL 2025/45-PR (Comments due 8/25)

Background:

At CCPR53 (2022), CropLife International introduced a discussion paper (CX/PR 22/53/20) raising concerns about the JMPR backlog of evaluations caused by the COVID-19 pandemic and cancellation of the JMPR Regular Meeting in 2020. The paper raised further concerns that the current system is unable to keep up with the demand for JMPR evaluations and made recommendations to CCPR53.

Based on deliberations at CCPR53, an EWG was established, chaired by the United States and co-chaired by Costa Rica, France, Germany, and Uganda, to collect information on the need to enhance the operational procedures of CCPR. The EWG drafted CL 2022/75-PR and summarized input from member countries and observer organizations in discussion paper (CX/PR 23/54/15) that highlighted areas of consensus and recommended a two-step approach that was approved by CCPR54 (2023):

- **Step 1:** Submit the EWG discussion paper to JMPR for their consideration to identify initial priorities for enhancing its operational procedures and to report back on its findings to the following session of CCPR.
- **Step 2:** CCPR will consider the reply from JMPR in consultation with the CCPR, Codex, and JMPR Secretariats, as well as FAO/WHO. CCPR and JMPR should develop an appropriate approach to identify potential priorities for enhancement and major structural reforms and develop a roadmap for implementation.

The EWG was re-established by CCPR54 and prepared a discussion paper for CCPR55 (2024) on approaches that may be adopted by CCPR to identify priorities and develop an implementation roadmap. Based on this discussion paper, CCPR55 agreed to adopt a multiprong approach that balances the shorter-term needs of stakeholders to reduce the backlog of scheduled evaluations with longer-term strategic efforts to increase JMPR's review capacity. This includes short-term work over 2024 – 2026 that focuses on:

- convening an extraordinary meeting of JMPR to reduce the backlog of evaluations; and
- consulting with JMPR and stakeholders to identify specific projects that will improve its evaluation process.

CCPR55 then re-established the EWG to support shorter-term work over the next three years (2024 – 2026) with the following terms of reference:

i. Facilitate collaboration with Codex Members and stakeholders to determine if support and resources are available to convene an extraordinary meeting of JMPR. If support is identified, the EWG will collaborate with the EWG on the schedule/priority list to determine the timeline and

nomination process. If support is not available, the EWG will seek input on other approaches that CCPR and JMPR could adopt to reduce the backlog of evaluations.

ii. Solicit input from Codex Members and stakeholders to get recommendations on targeted projects that may enhance CCPR and JMPR's current evaluation process. As part of this effort, the EWG will seek input on mechanisms to ensure current JMPR resources are used efficiently.

iii. Based on (i) and (ii), provide a status update at CCPR56 (2025) and make recommendations on future activities.

The EWG concluded that the terms of reference were completed but was unable to determine if support and resources are available to convene an extraordinary meeting of JMPR or adopt other approaches to reduce the backlog of evaluations. The EWG also requested additional feedback from Codex members and invited them to provide additional information and proposals on potential mechanisms that could support the short-term approach endorsed by CCPR.

U.S. Position:

The United States has chaired the EWG since it was first established in 2022 and appreciates the support and participation of Codex members and observers in discussions on opportunities and challenges associated with enhancing the operations of CCPR and JMPR. The EWG has gathered important stakeholder input on opportunities for enhancement and developed a general approach to prioritize potential areas of enhancement using a strategy that balances the shorter-term needs of stakeholders to reduce the backlog of scheduled evaluations with longer-term strategic efforts to increase JMPR's review capacity.

There is currently no mechanism to support holding an extra meeting of JMPR or developing enhancement projects, leading the United States to conclude that re-establishing the EWG is not warranted at this time. However, if support is identified, re-establishing the EWG could be beneficial in coordinating CCPR participation in the planning and implementation of proposed enhancement activities and projects.

Agenda Item 11: Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF Working Group on Compounds for Dual Use – Status of work

Documents:

CX/PR 25/56/13

CX/PR 25/56/13-Add.1 - Comments in reply to CL 2025/47/PR-RVDF and CL 2025/48/PR-RVDF (CLs not yet issued)

Background:

The 25th session of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF25, 2021) sought advice from the Executive Committee (CCEXEC) on a mechanism for cooperation between CCPR and CCRVDF on the establishment of harmonized Maximum Residue Limits (MRLs) for compounds with dual uses.[1] CCPR52(2021) also encouraged ways to facilitate and promote cooperation on cross-sectional issues between CCRVDF and CCPR.[2]

The 81st Session of CCEXEC (CCEXEC81, 2021) recommended that CCRVDF and CCPR establish a joint EWG to further advance their work on cross-sectional issues and facilitate the establishment of single/harmonized MRLs for edible animal tissues for compounds with dual use.

Following the recommendation[3] of CCEXEC81, the 44th Session of the Codex Alimentarius Commission (CAC44, 2021) agreed[4] to establish a Joint CCPR/CCRVDF EWG chaired by the United States, open to all Members and observers working with the support of the Joint FAO/WHO Expert Committee on Food Additives (JECFA), the JMPR and the Codex Secretariat to address procedural and technical issues related to the establishment of harmonized MRLs for compounds with dual use.

Following CCPR55 (2024), the Chair of the EWG sought advice from the Codex Secretariat on how to best progress the work of the Joint EWG. Based on this consultation and building upon the recommendations endorsed by CCPR55, the EWG considers that it would be beneficial to explore the feasibility of scheduling a virtual session of the Joint EWG that precedes a possible virtual Joint Session of CCPR and CCRVDF to address the current ToRs. In addition to the aforementioned benefits of a virtual session of the Joint EWG, this approach would allow final decisions to be made jointly by both committees rather than the Joint EWG presenting recommendations to each Committee separately. This would, therefore, assist in building consensus-based decision-making simultaneously for both Committees.

The update and challenges encountered by the EWG were presented to CCRVDF27 (2024). Views were expressed that the limited participation in the Joint EWG might be due to challenges with accessing and using the online forum in which the EWG operates. The Codex Secretariat acknowledged that the online forum might not be perfect. However, because the online forum handled a range of tasks in Codex, it

1 REP21/RVDF25, para. 146
2 REP21/PR52, para. 12
3 REP21/EXEC81, paras. 33-34
4 REP21/CAC44, paras. 64-66

might not be easy to find a solution that provided all the required features. The Codex Secretariat encouraged Members and Observers to provide feedback on specific examples of challenges they faced and suggest solutions for improving work in the online forum, noting that these challenges would need to be addressed within the constraints of available resources.

CCPR56 is invited to:

(i) indicate their continued support for the Joint CCPR/CCRVDF EWG;

(ii) endorse scheduling a virtual session of the Joint EWG that precedes a virtual Joint Session of CCPR and CCRVDF;

(iii) encourage Codex members and observers to participate in the possible virtual session of the Joint EWG and possible virtual Joint Session of CCPR and CCRVDF; and

(iv) encourage Codex members and observers to liaise with their veterinary (animal health) service counterparts to coordinate positions and actively participate in the work of the Joint EWG, including providing replies to the circular letters on harmonization of food descriptors (CL 2025/47-PR/RVDF) and harmonization of MRLs for dual use compounds (CL 2025/48-PR/RVDF).

U.S. Position:

The United States supports the continued work of the Joint CCPR/CCRVDF EWG and will participate in a joint virtual session of both committees.

Agenda Item 12: Other business

Documents:

None

Background:

Codex members and observer organizations are permitted to propose additional committee discussion topics. No topics have been proposed as of this date but may be up to the adoption of the meeting agenda.

U.S. Position:

The United States will make interventions on other business if warranted.