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## REQUEST FOR CONTRIBUTION

|          |                                                                                                                                             |
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| From:    | General Secretariat of the Council                                                                                                          |
| To:      | Working Party on International Food and Agricultural Questions (Codex - CCPR)                                                               |
| Subject: | CCPR56 - Item 9: Establishment of the schedules and priority lists of pesticides for evaluation / re-evaluation by JMPR - Final EU comments |

Delegations will find in annex the **Final EU comments** on the agenda item 9 of the 56th session of the Codex Committee on Pesticides Residues (CCPR56).

The document has been submitted by the Commission services to the Codex secretariat.

## **CODEX COMMITTEE ON PESTICIDES RESIDUES**

**56th Session**

**Santiago, Chile 8 – 13 September 2025**

**European Union comments on**

### **Agenda item 9**

**Establishment of the schedules and priority lists of pesticides  
for evaluation / re-evaluation by JMPR**

**(CL 2025/44-PR - CX/PR 25/56/11)**

*European Union Competence  
European Union Vote*

The European Union (EU) would like to thank the Electronic Working Group (eWG) on Priorities chaired by Australia for the preparation of CL 2025/44-PR and its appendices, as well as the work done to incorporate the requests from members and sponsors.

### **GENERAL COMMENTS**

1) The EU would like to refer to their comment to Circular Letter CL 2024/43-PR of 17 May 2024. The EU notes that the late submission/incomplete submission of dossiers is a recurring problem for JMPR, as noted by JMPR in its 2024 summary report under section 10 on efficiency of JMPR resources: "As highlighted at several past JMPRs (2015, 2018, 2019 and 2023), sponsors have been strongly encouraged to submit chemical dossiers that comply with the quality and scope specified in the CCPR Risk Analysis Principles. The current meeting received several dossiers for new and periodic review compounds which lacked critical residue and toxicology data to establish health-based guidance values, residue definitions for compliance and/or dietary risk assessments (e.g. periodic review of chlorpyrifos, permethrin and ethoxyquin). In another case, the dossier for a new compound (cyclobutirfluram) included a very limited use pattern where this use did not give rise to detectable pesticide residues (whole banana)."

The EU notes that out of the seven substances assessed under periodic review by JMPR in 2024, data submitted was insufficient to establish toxicological reference values for four substances (chlorpyrifos, maleic hydrazide, ethoxyquin, permethrin). For chlorpyrifos, the EU recalls that it was agreed at CCPR53 in 2022 to maintain scheduling chlorpyrifos for periodic review because an Observer confirmed its commitment to provide the necessary data for the periodic review of chlorpyrifos<sup>1</sup>. This was not the case. The EU therefore proposes that chlorpyrifos is moved to table 5 of unsupported compounds. The EU also kindly requests a clarification on the status of chlorpyrifos-methyl, which was intended to be reviewed at the same time as

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<sup>1</sup> CCPR53 report, paragraph 219. [https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-53%252FREPORT%252FFINAL%252520REPORT%252FREP22\\_PR53e.pdf](https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-53%252FREPORT%252FFINAL%252520REPORT%252FREP22_PR53e.pdf)

chlorpyrifos and for which CCPR53 in 2022 agreed to retain all the CXLs under the 4-year rule. As no data were received and no support was announced, CXLs should be revoked.

The EU would like CCPR to urgently look for solutions and efficient mechanisms for the JMPR's recurring problem which is crucial for the way to solve the long backlog of evaluations. For example, a tool could be developed to provide sponsors well in advance with information on i) when a commitment for developing a dossier needs to be provided, and ii) with the submission date for the dossier. Based on the submitted dossiers, the work programme for JMPR could be discussed/agreed. In addition, EU notes that especially problematic is the data submission for substances under periodic review and therefore suggests developing an efficient procedure which would for example preclude that existing Codex MRLs are maintained in the Codex system and aims to avoid that the compounds are rescheduled at each JMPR Meeting.

2) The EU would like to refer to their comment to Circular Letters CL 2024/43-PR of 17 May 2024 CL 2023/26 PR of 16 May 2023 and invites the CCPR to consider adding more substances into periodic review in order to ensure that there are enough substances to evaluate.

The EU notes that although ten substances have been listed for periodic review in 2025, for several compounds it is not clear whether these will be reviewed in 2025. The EU notes that as the experience from previous years has shown that although there are always several compounds scheduled for a periodic review in that specific year, the review is often postponed or not possible to finish for several reasons for one or more years. Out of the ten substances listed, seven had actually been postponed before (2-phenylphenol, fenbutatin oxide, malathion, pirimicarb, hydrogen phosphide, clethodim, guazatine).

Therefore, one option could be to list a higher number of substances e.g., 20, in order to ensure that there will be a stock of substances from which a minimum of five substances<sup>2</sup> could be effectively reviewed each year. In programming more substances at the onset, a continuous flow of periodic reviews will be ensured for the coming years.

In addition, substances with unclear support should get a reserve status in Table 2A (Priority lists of periodic reviews – 2024 & beyond) and Table 2B (Periodic review list (compounds listed under 15-year rule but not yet scheduled or listed). Those with a reserve status will be re-evaluated once the data will become available or the reserve status should be deleted, and the compound should be deleted from the Codex List of pesticides at the latest after 25 years after the last evaluation. In particular, substances for which an incomplete dossier has been submitted should only be put back on the agenda with a new date stamp once the data is declared complete.

3) The EU would like to note that regarding new uses related to eggplants based on the previously discussed extrapolation from peppers, six are scheduled for 2025 and one for 2026. While the EU does not object, the EU would like to highlight that given the limited resources of JMPR, evaluations for periodic review should be prioritised.

## **A. SCHEDULES AND PRIORITY LISTS**

### **Paragraphs 1 and 3 – periodic reviews in 2024 and 2025**

The EU would like to suggest that it would be useful to list explicitly the substances from the 2024 periodic review schedule for which no support was given and for which JMPR did not

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<sup>2</sup> [Report of the 49th session of the Codex Committee on Residues](#)

proceed, i.e., chlorpyrifos, maleic hydrazide, ethoxyquin, permethrin. JMPR 2024 could not conclude due to missing data, mainly toxicological data, but depending on the outcome of a toxicological assessment, it might be necessary to update also the residue assessment. These substances therefore need to be added in the 2025 periodic review schedule (except maleic hydrazide which has been added to the 2026 list). In addition, Regarding the 2025 periodic review schedule, it would be useful to flag clearly for which substances the indication of support is still pending. This would make it clearer to see for which active substances decisions need to be made.

The EU notes that chlorpyrifos-methyl had been scheduled for periodic review but disappeared from the list. However, it should either be kept listed for review or, if there is no support, it should be deleted and moved into the table of unsupported compounds.

The EU notes that four substances (pirimicarb, hydrogen phosphide, clethodim, guazatine) were scheduled for periodic review in 2025 under the four-year rule based on the decision of CCPR52 in 2021. This means also that no prolongation is possible and periodic review is strongly recommended for these substances. If late or incomplete dossiers are provided and consequently a periodic review does not take place, these substances should be deleted and moved into the table of unsupported compounds at the following CCPR meeting (CCPR57), and that all CXLs and/or Codex MRL proposals at step 4 (for guazatine) should be revoked/withdrawn

The EU notes that among the 7 substances of table 2A proposed for periodic review in 2026, it is indicated by the EWG that, for 5 substances, as of 23 May 2025, no indication of support, or commitment for data, has been provided. See general comments, point 2.

In addition, the EU notes that for carbendazim, scheduled for periodic review in 2025, the toxicological evaluation was conducted more than 25 years ago, and the 2023 JMPR withdrew its health-based guidance values. If no suitable data are submitted to JMPR for assessment in 2025, then the compound and all related CXLs should be deleted from the Codex Database as agreed by CCPR55.

Finally, the EU notes that although the nomination of new uses was initially combined with new or periodic evaluations, the 2025 priority list for new compound evaluations contains two substances for which the MRLs are below the LOQ (1-Octanol, XDE-747 (Haviza)), under the reserve status. For efficient use of JMPR resources, these compounds should retain this status until uses are authorised where residues occur in food, or until the JMPR backlog is solved.

### **C. FINALISING THE PROPOSED SCHEDULE FOR 2026**

#### **Paragraph 11**

The '2026 periodrev' worksheet lists seven compounds in the proposed 2026 Schedule of Periodic Reviews. Support has been confirmed for only two compounds, indoxacarb (216) and maleic hydrazide (102). In case no support is submitted for the substances carbaryl (008), methyl bromide (52), disulfoton (74), pirimiphos-methyl (86) and flumethrin (195) revocation of CXLs should be considered at CCPR57.

### **D. PRIORITY LISTS 2027 AND BEYOND – TABLE 1**

#### **Paragraph 14**

No new compounds have been nominated for JMPR evaluation in 2027. The EU proposes to use the capacity for periodic reviews for dithiocarbamates if agreed by CCPR56 (see JMPR

Report 2024, point 2.7 Strategy and timing for JMPR re-evaluation of dithiocarbamates).. According to the proposal of JMPR, the toxicological evaluations should be performed in three phases, starting with mancozeb, metiram and ETU in phase 1 (2027), propineb and PTU in phase 2 (2028) and ziram and thiram in phase 3 (2029). The residue evaluation should be performed at the same time as phase 3 of the toxicological assessment.

## **F. TABLE 2B**

### **Paragraph 20**

The EU welcomes the updates made to Table 2B to include the year of the last comprehensive assessment of the compound and the findings of the National Registration of Pesticides working group that are relevant to each compound.

## **G. PUBLIC HEALTH CONCERNS**

### **Paragraph 21**

The EU has submitted a concern form for acetamiprid.

## **ADDITIONAL POINTS**

The EU would like to share that typos were found in the worksheet “2027 & beyond-new use-other”: For fluopyram (line 21) in column G, it should read “Dragon fruit, pomegranate, guava” instead of “Dragon fruit, pomegranate, dragon fruit”, and in the worksheet “Table 3 record of review”: for dinocap (line 127) in column D, it should read “1998R” instead of “199R”. Additionally, Table 3 is not always updated in line with Tables 2A and 2B.