

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, 11, 15, 16, 17, 18

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

53rd Session

(Virtual)

4-8 July and 13 July 2022

(Comments of Morocco)

Agenda Item 6: DRAFT AND PROPOSED DRAFT MAXIMUM RESIDUE LIMITS FOR PESTICIDES IN FOODS AND FEEDS AT 3 CX/PR 22/53/5

Morocco would like to thank JMPR for the evaluations made and for the preparation of the two reports (Regular and Extra).

Fipronil

Morocco expresses its concern for the advancement of Fipronil MRLs as the JMPR estimate shows that long-term dietary exposure to Fipronil residues may present public health concerns.

Chlorpyrifos

Morocco supports the conclusion of the JMPR that the supervised field trials for chlorpyrifos on eggplant were conducted at a significantly longer reprocessing interval and cannot be used for the estimation of a maximum level of residues.

Cypermethrines (including alpha- and zeta-cypermethrin)

Morocco supports the conclusion of the JMPR that the supervised field trials for Cypermethrines on eggplant were conducted at a significantly longer reprocessing interval and cannot be used for the estimation of a maximum level of residues.

Agenda Item 8: COORDINATION OF WORK BETWEEN CCPR AND CCRVDF: JOINT CCPR/CCRVDF WORKING GROUP ON COMPOUNDS FOR DUAL USE - STATUS OF WORK – CX/PR 22/53/10

Morocco would like to thank the United States for the preparation of the working document.

Morocco welcomes the efforts of the electronic working group to generate the mechanisms that could be used to collaborate between the CCRVDF and the CCPR for the establishment of harmonized maximum residue limits (MRLs) for dual-use compounds.

Agenda Item 9: GUIDELINES FOR THE RECOGNITION OF ACTIVE SUBSTANCES OR AUTHORIZED USES OF ACTIVE SUBSTANCES OF LOW PUBLIC HEALTH CONCERN THAT ARE CONSIDERED EXEMPTED FROM THE ESTABLISHMENT OF MAXIMUM RESIDUE LIMITS OR DO NOT GIVE RISE TO RESIDUES (AT STEP 7) CX/PR 22/53/11

Morocco would like to thank Chile, India and the United States of America as well as all the countries and organizations of the electronic working group for the preparation of the guidelines document.

Morocco supports the advancement of the draft guidelines for compounds with low public health concern that are considered exempted from the establishment of maximum residue limits or do not give rise to residues.

Nevertheless, Morocco makes two suggestions:

Criterion 2. Active substances for which it is not possible to differentiate between the exposure associated with its use as pesticide with its environmental relevant exposure levels or its other uses in the food chain

Suggestion: A case-by-case examination is necessary taking into account the specificities of the allergenic substances and the levels of its exposure to protect populations vulnerable to allergens.

Criterion 4. Microorganisms that are not of human or animal health concern

Suggestion: In the case of microbial substances (based on bacteria), a case-by-case examination is necessary, taking into account their sensitivity to antibiotics.

Morocco notes that the exemption of low-risk compounds from MRLs would encourage the use of these compounds in the crop protection field and further would facilitate international trade of food and feed products.

Agenda Item 11: DISCUSSION PAPER ON THE MANAGEMENT OF UNSUPPORTED COMPOUNDS WITHOUT PUBLIC HEALTH CONCERN SCHEDULED FOR PERIODIC REVIEW. CX/PR 22/53/13

Morocco would like to thank Australia, India and Kenya as well as all the countries and organizations that participated in the electronic working group for the preparation of the working document.

Morocco supports the proposal for the development of the discussion paper as well as the actions for the management of unsupported compounds which do not present a risk to public health, and which should be subject to periodic review.

Morocco welcomes particularly the capacity building activities to strengthen capabilities of codex members to satisfy requirements for JMPR evaluation.

Agenda Item 15: DISCUSSION PAPER ON MONITORING THE PURITY AND STABILITY OF CERTIFIED REFERENCE MATERIALS OF PESTICIDES DURING PROLONGED STORAGE. CX/PR 22/53/17

Morocco would like to thank India, Argentina and Iran as well as all the countries and organizations that participated in the preparation of the discussion document.

Limited shelf life, diminishing purity with time, and high recurring cost are some major constraints generally faced by the laboratories especially in the developing countries for qualitative and quantitative determination of pesticide residues in foods.

A laboratory which maintains the CRM at storage conditions better than those recommended by the manufacturer (i.e., temperature lower than recommended without exposure to light and moisture), the rate of degradation of the CRM is significantly minimized.

Morocco supports the work on monitoring purity and CRM stability of multi-class pesticides during prolonged storage.

Morocco considers that this issue deserves to be deepened within an electronic working group with a mandate decided by the CCPR.

Agenda Item 16: Mitigation of trade impacts associated with the use of environmental inhibitors in agriculture. CX/PR 22/53/18

Morocco welcomes the initiative of New Zealand and Australia to propose a new working document on the use of environmental inhibitors in agriculture to reduce the release of greenhouse gases such as methane or a soluble nitrogen into waterways or aquifers.

In some areas in the world, inhibitors of methane production and inhibitors of nitrous oxide release are used.

Proposition:

Noting that one of the roles of CCPR is to establish MRLs for environmental and industrial contaminants with chemical similarities to pesticides in specific foods or groups of foods, Morocco suggests to develop a list of inhibitors, their uses and contingency of finding them in food and feed commodities. Then, the CCPR decides on the relevance of these inhibitors in relation to its expertise and current practices of the CCPR. This issue should also be referred for consideration by CCRVDF.

Agenda Item 17: DISCUSSION PAPER ON A MODIFICATION OF THE PORTION OF COMMODITIES TO WHICH CODEX MAXIMUM RESIDUE LIMITS APPLY AND WHICH IS ANALYZED GROUP 14 (ASSORTED FRUITS – INEDIBLE PEEL). CX/PR 22/53/19

Morocco welcomes Ecuador's initiative for the preparation of the discussion paper.

Group 14 "Assorted Tropical and Sub-Tropical Fruit - Inedible Peel" includes more than 70 fruits. In most cases, the skin of Group 14 products is removed.

Morocco notes that in some cases the peel of group 14 fruits is edible (e.g. avocado, kiwi, banana, prickly pear, etc.), particularly as processed commodities. In addition, it should be noted that currently there are trends for the consumption of the peels of certain fruits for their virtues (very rich in vitamins and mineral salts).

Morocco considers that this question deserves to be deepened and it is in favor of the establishment of an electronic working group with a mandate decided by the CCPR.

Agenda Item 18: DISCUSSION PAPER ON ENHANCING OPERATIONAL PROCEDURES OF JMPR AND CCPR TO ELIMINATE THE BACKLOG OF EVALUATIONS AND MEET THE FUTURE DEMAND OF ESTABLISHING CODEX MAXIMUM RESIDUE LIMITS FOR PESTICIDES. CX/PR 22/53/20

Morocco welcomes the initiative of CropLife international for the preparation of discussion paper.

Morocco notes the challenge for CCPR and JMPR to undertake review of a high number of compounds both in a timely and efficient manner. This requires additional financial resources and experts for the JMPR.

It is obvious that many countries have set thousands of MRLs that do not exist in the Codex. Morocco is in favor of seeking a solution to adopt CXLs for new compounds that are more respectful of consumer health and also for new uses, especially minor uses.

Morocco supports the re-establishment of the electronic working group to identify possible solutions to reduce the backlog of evaluations and meet the demand of CXLs.