

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3, 4a, 4b, 5a, 5b, 6, 7a, 7b, 7c, 7d, 8, 9, 10, 11, 12, 13, 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 Uganda)

Agenda Item 3: Matters referred to CCPR by CAC and/or other subsidiary bodies: CX/PR 22/53/2

Uganda appreciates CCPR and CAC for sharing information. Uganda would like to state that, as a country will follow the information mentioned.

Uganda will keep track of the events mentioned in the report and where need be Uganda would participate in the events.

Agenda Item 4(a): Matters of arising from FAO and WHO: CX/PR 22/53/3

Uganda would like to thank FAO and WHO sharing this information. We want to state that the first International Day of Plant Health (IDPH) are very important events for the African continent considering that agriculture is the backbone of economic activities in Africa. We look forward to joining other member states in these events.

Uganda also adds its support to the implementation of the international standards on phytosanitary measures to protect global plant resources, while facilitating safe trade; focusing on sustainable pest management and pesticides through the promotion of green and digital plant protection.

Uganda would also further like to thank the WHO Executive Board for endorsing the WHO Global Strategy for Food Safety 2022-2030. Uganda also welcomes the development that WHO has been given another mandate to update its global burden estimates of foodborne diseases by 2025. Uganda looks forward to participating in any upcoming activities on the estimation of the burden of food-borne disease.

Agenda Item 4(b): Matters arising from other international organizations: CX/PR 22/53/4

The Food and Agriculture Organization of the United Nations (FAO) and international Atomic Energy Agency (IAEA) Centre of Nuclear Techniques in Food and Agriculture work with Member Countries to contribute to food security and sustainable agricultural development by the use of nuclear techniques and biotechnology.

Activities of relevance to the CCPR include developing and using nuclear and isotopic analytical methods for the analysis and control of various chemical residues and food contaminants in agricultural products.

Uganda would like to welcome the report by the representative of IAEA. We want to thank IAEA for all the technical support it has been providing to most developing countries in strengthening both the human expertise and technical infrastructures of many analytical laboratories.

Justification:

IAEA supported a one-day virtual African Food Safety Workshop held on 4 August 2021 under the framework of the African Food Safety Network (AFoSAN). Nearly 500 participants interested in food safety in Africa attended the event. The Uganda also benefited from a regional training course on residue analysis for food crops from supervised field trials, which was held in Kampala, Uganda, from 28 March to 1 April 2022. The course had 30 participants from 16 countries. The above training also included discussions on the purity and stability of certified reference material for pesticides, a topic of recent interest to CCPR members.

Agenda Item 5(a): Report on items of general consideration arising from the 2021 JMPR extra and regular meetings: Section 2 of the JMPR Report

Uganda agrees with the observation that the continuation of the online-only meeting format is expected to give only limited benefits which overall are outweighed by counterproductive aspects which do not aid future JMPR decision-making.

Justification:

JMPR is right to sight some of the challenges that Virtual meeting is not favourable when there is a need for in-depth scientific discussion.

Uganda also agrees with the proposed position submitted by the African Union.

Agenda Item 5(b): Report on responses to specific concerns raised by CCPR arising from the 2021 JMPR regular meeting: Section 3 of the JMPR Report

Uganda agrees with the observations cited in the report. Uganda, as a country will follow the information mentioned in report.

Uganda will keep track of the events mentioned in the report and where need Uganda would participate in the events.

Agenda Item 6: MRLs for pesticides in food and feed (at Steps 7 and 4): CX/PR 22/53/5

During every session of CCPR as a standing agenda item JMPR secretariat submits the results of the evaluation of pesticide residues data and the proposed MRLs in food and feed for consideration by the session.

Uganda welcomes the report of the evaluation by JMPR and the specific comments on the proposed MRLs of individual compounds for the different food and feed items proposed by the African Union.

Agenda Item 7(a): Revision of the Classification of Food and Feed (CXA 4-1989) Establishment of MRLs for pesticides for okra: CX/PR 22/53/6

Uganda agrees to support the proposal of using the non-chili pepper as the representative crop for okra based on the low exceedances for okra and the sufficient conservatism in MRLs derived using the OECD MRL calculator, which is protective of actual residues in okra.

Option 1 offers more flexibility in the use of monitoring data as well as the possible use of alternative representative commodities that may be selected based on documented regional/country differences in dietary consumption and/or areas of production.

Justification:

The approach offers okra a possibility of having MRLs set using a representative data set, while offering actual protection for actual residues of okra. The approach is trade facilitative.

Agenda Item 7(b): Revision of the Classification of Food and Feed (CXA 4-1989) Class B – Primary Food Commodities of Animal Origin (All Types) (at Step 4): CX/PR 22/53/7

Uganda appreciates the EWG chaired by the USA and Co-chaired by the Netherlands for developing the document.

Uganda also support the proposal to add type miscellaneous primary food commodities of animal origin and support the proposal that before the revision of the class is completed, there was need to finalize the discussion concerning the skin.

Uganda also suggested that during the revision other commodities might also be added since these commodities are traded and consumed by the population. For example insects, silver fish and the specific comments on the agenda item proposed by the African Union.

Agenda Item 7(c): Revision of the Classification of Food and Feed (CXA 4-1989) Class E - Processed Foods of Animal Origin (All Types) (at Step 4): CX/PR 22/53/8

Uganda supports the position proposed by the African Union

Agenda Item 7(d): Revision of the Classification of Food and Feed (CXA 4-1989)

Coordination of work between CCPR and CCRVDF: Class B – Primary food commodities of animal origin Harmonization of meat mammalian maximum residue limits between CCPR and CCRVDF: Harmonized definition for edible offal and other edible animal tissues- CX/PR 22/53/9

Uganda appreciates the Chair of the EWG the USA and the Co-Chair for guiding this discussion.

Uganda agrees to consider a harmonized definition, which minimizes double regulation.

Justification:

The proposed definition by CCRVDF appears to not be aligned to the poultry meat with skin and skin, whole fish and edible offal of fish. The OECD TG 505 also poses another challenge, it requires sampling of meat and in addition, skin is necessary in case of dermal use.

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

Uganda provides comments to the questions provided by the Joint EWG below.

1. What work has been done cooperatively between CCRVDF and CCPR?
2. What are areas where CCRVDF and CCPR could collaborate in the future?
3. What mechanisms could be used to collaborate between CCRVDF and CCPR?

Comments:

1. Most work done cooperatively between the CCRVDF and CCPR has been limited to responses on specific provisions made in response to specific issues. The work has necessitated waiting for responses from either committee meeting, and hence there has been delay establishment of MRLs from the two committees.
2. Possible future areas to collaborate may include EWG to discuss proposed MRLs on animal tissue where dual uses exist to discuss concerns that may arise in the elaboration of MRLs from compounds of dual use.
3. Mechanism that could be used during the collaboration may include:
 - Establishment of EWGs to discuss specific areas of interest between the 2 committees
 - Joint JMPR and JECFA meetings in cases where dual use compounds are under consideration.

Justification:

The proposed mechanisms of cooperation between CCPR and CCRVDF will enhance work in cross-sectional issues.

Agenda Item 9: Guidelines for compounds of low public health concern that may be exempted from the establishment of Codex MRLs or do not give rise to residues (at Step 7): CX/PR 22/53/11

Uganda agrees with the presentation and the amended of the titles.

Uganda recommends that the document be progressed to the next step of 5-8 so that member countries can give the document more scrutiny.

Justification:

The guidelines on the recognition of compounds of low public health concern that are considered exempt from the establishment of MRLs or do not give rise to residues will support the use of these compounds as alternatives to conventional pesticides and offer a wider range of tools for management of pests in crop production systems.

Agenda Item 10: Engagement of JMPR in parallel reviews of new compounds: Criteria for selecting the global project manager for the parallel review process: CX/PR 22/53/12

Uganda appreciates the Chair of the EWG Canada and the Co-Chair for guiding the discussion and the very comprehensive criteria for the selection of a global manager.

Uganda therefore agrees with the proposed selection criteria for a global manager.

Justification:

The success of such a pilot project requires a manager who has the required competencies and a record of accomplishment of having handled scientific project with success.

Agenda Item 11: Management of unsupported compounds without public health concern scheduled for periodic review: CX/PR 22/53/13

Uganda appreciates the Chair of the EWG Chile, and co-chaired by Australia, India, and Kenya for guiding the discussion.

Uganda supports the proposal made by the EWG led by Chile and co-chaired by Australia, India, and Kenya in Section 1 and 2 of the guidelines. We propose a need to link information from the national registration database for ease of joint data generation, especially where calls for support are unsuccessful.

Justification:

The proposal encourages communication on the status and data requirements for unsupported compounds with no public health concerns and provides for open communication and data generation of compounds that do not have support and have no public health concerns. The proposed guideline also spells out the various stakeholders and possible role in supporting review of the unsupported compounds

Agenda Item 12: National registrations of pesticides: CX/PR 22/53/14

Uganda supports the ongoing work to continuously update the database. The Uganda believes that the current update is appropriate enough to support the scheduling and prioritization of compounds due for periodic review.

Uganda also cites some difficulties in making entries in the spreadsheet, which still needed more explanation.

Justification:

This a very useful data resource that can be used to facilitate support of pesticides during periodic re-evaluation and determine the global registration status of unsupported compounds.

Agenda Item 13: Establishment of Codex Schedules and Priority Lists of Pesticides for Evaluation/Re-Evaluation by JMPR: CX/PR 22/53/15

Uganda appreciates the Chair of the EWG Chile, and co-chaired by Australia, India, and Kenya for guiding the discussion.

Uganda supports the schedules and priority list for 2023 JMPR evaluation. Uganda also recommends that the sponsors give special consideration for data support for compounds under table 2B, which do not have public health concerns. Considering that, some of these compounds are still registered in most developing countries and therefore require MRLs.

Therefore, Uganda is in support of their submission for approval by CAC.

Justification:

For most of the compounds scheduled for 2023, they meet the following requirements: FAO nomination forms have been received for most of these compounds. The date stamping has been carried out. In addition, the sponsors have registered the compounds.

Agenda Item 15: Discussion paper on monitoring the purity and stability of certified reference material of multi-class pesticides during prolonged storage: CX/PR 22/53/17

Uganda appreciates the chair of the EWG Argentina and Co-chair for guiding the discussion.

Uganda is in support of the recommendations to develop the discussion paper on monitoring the purity and stability of certified reference material of multi-class pesticides during prolonged storage.

Uganda will participate in the electronic working group (EWG) once CCPR 53 agrees to consider the proposal for the new work.

Justification:

Develop criteria to recognize the expired/expiring CRMs with valid purity and stability to continue using them in analysis of multi-class pesticides and use of expired CRMs with validated purity and stability in the measurement systems will not only ensure continuity of their use in the laboratories but also have economic impact by saving the purchasing cost of fresh CRMs.

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. Moreover, the date of expiry recommended in the CoA limits the use of CRMs after their expiry. This leads to high recurring cost of procuring new CRMs by the laboratories working in the field of multi-pesticide residue analysis. In long-term storage study, the CRM are usually stored in a deep freezer at ≤ -20 °C for a period of 2 or more years. Under such conditions, the expiry date as recommended by the RMPs may be extended as appropriate for a CRM by a date allowing for storage up to 10 years.

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

Uganda appreciates the chair of the EWG New Zealand and co-chair for guiding the discussion.

Uganda welcomes the new proposal by New Zealand and Australia for CCPR to discuss the use of environmental inhibitors as a new work item. Noting that the role of CCPR is to establish MRLs pesticides, in food and feed commodities there is therefore need for more clarity on how the environmental inhibitor can be added to the current mandate of CCPR.

Uganda recommends that a list of these inhibitors and their potential to be found in food and feed be made available to assist any decision-making by CCPR. The members further recommended that a similar discussion be initiated at CCRVDF since these inhibitors are used in animal husbandry as well.

Justification:

The current role of CCPR is to develop MRLs in food and feed, the proposal for this committee to look at environmental inhibitors may go beyond its existing mandate.

Agenda Item 17: Modification of Group 14 (Assorted fruits – inedible peel): CX/PR 22/53/19

Uganda appreciates and is in the report provided on the modification of Group 14.

Uganda is in support of the recommendations made by the African Union.

Justification:

Whereas the habits of consumption of Group 14 (avocados, passion fruit, bananas, pineapple, kiwi fruit, mangoes, papayas, guavas) has not been considered when trying to carry out the analysis of pesticide residues since the skin is removed; It is, therefore, important to determine what the impact of such a modification to the guideline will have on existing MRLs.

Agenda Item 18: Enhancing operational procedures of JMPR and CCPR to eliminate the backlog of evaluations and meet the future demand of establishment CXLs: CX/PR 22/53/19

Uganda appreciates Croplife International for this elaborate paper highlighting the challenges of backlog of evaluations and future demand of establishing MRLs for pesticides. Uganda agrees with all the four recommendations in the paper, as they provide a pragmatic approach to addressing the current challenges of the backlog of evaluation.

Justification:

The outbreak of COVID19 has resulted in a backlog of unevaluated compounds by JMPR which will ultimately result in missing MRLs for certain commodities. The paper by Croplife suggests possible solutions to how this challenge should be overcome