

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 3, 6, 13

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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 CropLife International)

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

##### Background

It is noted in CX/PR 22/53/2 that:

“CAC44 adopted the:

- Maximum residue limits (MRLs) for different combinations of pesticide/commodity(ies) for food and feed at Step 5/8 with the revisions to the MRLs for metaflumizone for mammalian fats (excluding milk fats) at 0.15 mg/kg and milk fats at 0.6 mg/kg. ....”

These MRLs became official codex standard in mid-December 2021 and it is noted that the online Codex MRL pesticide database (<https://www.fao.org/fao-who-codexalimentarius/codex-texts/dbs/pestres/pesticide-detail/en/>) has not yet been updated to reflect these changes.

##### Comment

In line with Goal 3 of the Codex Strategic Plan 2020-2025 (Increase recognition and use of Codex Standards), and to facilitate trade and the timely adoption of codex MRLs, CropLife International kindly requests that the Codex Secretariat provides appropriate resources and priority to update this database in a timely manner following the Codex Alimentarius Commission approving them.

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

##### Background

CropLife International notes that the EU will introduce reservations to the advancement of proposed draft MRLs for Clothianidin (238) and Thiamethoxam (245) pending ongoing review of MRLs in the EU, arguing that these substances would contribute to the worldwide decline of pollinators; and for Quinoxifen (222) pending ongoing review of MRLs in the EU, arguing that environmental issues of global nature would exist, such as the accumulation of persistent, bio-accumulative and toxic substances in the environment.

##### Comment

CropLife International respects that the EU has entered reservations pending ongoing review processes. CropLife International contends that in those geographies where there are apparent pollinator declines, this is primarily due to a range of other factors, including parasites such as the Varroa mite and other factors such as habitat loss and land use change. It cannot be reasonably concluded that individual crop protection active ingredients are the root cause of pollinator declines. It is also important to note that in some geographies where the compounds in question are authorised for use, there are thriving and increasing populations of some pollinators, including bee species.

In instances where authorities are of a view that there may be possible global environmental issues, we recommend that these be considered through appropriate international fora, not through unilateral implementation of non-tariff trade barriers. Any hazards can and should be risk managed to acceptable levels, for example through appropriate labelling and stewardship. We recall that MRLs are established to facilitate trade in safe food and feed. They are not intended to be a mechanism for unilateral enforcement of individual environmental risk management actions.

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

CropLife International thanks the tireless efforts of the Chair of the electronic working group on schedules and priorities in managing and maintaining this important activity. CropLife International also thanks the dedicated work of the JMPR secretariat and the experts who work in support of JMPR.

For those that do not follow this piece of the Codex MRL setting process, the schedule agreed by CCPR, is then endorsed by CAC and becomes the work slate for the upcoming JMPR. To transform the schedule into a JMPR work slate, the JMPR secretariat publish a data call-in which is the trigger for data sponsors to prepare packages for JMPR experts to review and make codex MRL proposals. The most recent data call-in can be found [here](#).

In 2021, CCPR52 agreed a schedule of work ([REP21/PR](#) appendix XV) which was endorsed by CAC. Due to the pandemic, JMPR has understandably had a reduced output over the last two years leading to a backlog of reviews and as such did not publish a data call-in based on this schedule. Therefore, the schedule agreed last year has not been acted upon.

Data sponsors need predictability of outcome. Before CCPR considers establishing another schedule of work for JMPR, CropLife International suggests that the JMPR secretariat provides an update on the likelihood of clearing the existing backlog at this year's JMPR for which data was requested in October 2019 and October 2020.

To support innovation and facilitate trade of commodities treated with new compounds which are already registered in some countries, CropLife International suggests that CCPR53 also establishes a schedule of new active ingredients from the current "2023 new cpd" list. JMPR is requested to allocate resource first to clearing the backlog, second to the schedule agreed by CCPR52 and approved by CAC44, and finally to the proposed schedule mentioned above in order of priority established by the Chair of the eWG of Schedules and Priorities.