CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda item 3 **CRD05**

July 2024

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR LATIN AMERICA AND THE CARIBBEAN

Twenty-third Session

Virtual

22-26 July 2024

AN INFORMATION NOTE ON SIDE EVENTS ON ENVIRONMENTAL INHIBITORS IN AGRIFOOD SYSTEMS AND THE ROLE OF CODEX

(submitted by New Zealand)

Purpose

1. New Zealand welcomes the opportunity to inform CCLAC Members of the informal workshops New Zealand has convened on Environmental Inhibitors (EIs) as side events to the Codex Committee on Pesticide Residues (CCPR55) in June 2024 and at the forthcoming Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF27) meetings. These side events are to help facilitate recognition and understanding of the importance of environmental inhibitors to advancing global interests around mitigating the impact of climate change, transforming food systems while advancing broader food security and sustainability goals.

Background

2. One of the strategic goals of Codex is to address current and emerging issues in a timely manner. There are significant global challenges arising from climate change and other environmental pressures necessitating food systems transformation to feed a growing global population in a sustainable manner to meet broader sustainability goals and targets. Using environmental inhibitors to mitigate greenhouse gas emissions and increase food production is an important tool to reduce the environmental impact of agriculture.

3. Codex, as the pre-eminent global body for food standards for health protection and trade has a major role to play through the development of appropriate international standards that assure the safety of food while minimising technical barriers to trade arising from the use of EIs.

Progress to date

4. In 2019, the 42nd session of the CAC adopted the *Guidelines for rapid risk analysis following instances of detection of contaminants in food where there is no regulatory level* (CXG 92 - 2019). This work was progressed through the Codex Committee on Contaminants in Food (CCCF) and achieved two important objectives. Firstly, it promoted a generic and internationally agreed risk-based approach to dealing with substances that may be detected in food but for which there are no specific limits established in Codex. Secondly it helped draw attention to detection of very low traces of substances (including environmental inhibitors) that may increasingly be detectable in food largely through advances in detection technologies. The guidelines covered a range of substances including those used to address specific environmental considerations.

5. Both the CCPR and the CCRVDF have acknowledged the relevance of environmental inhibitors and the need to address any potential food safety issues and agreed that these compounds can be addressed within their mandates and procedures. These were important first steps to formal consideration of specific compounds in due course.

6. Different EI compounds are being used in countries depending on production systems and environmental constraints. For instance, some farmers/companies/researchers are more interested in using EIs that are applied to the land or fed directly to animals to reduce the production of greenhouse gases (such as methane) or to reduce the release of nitrous oxide into the atmosphere and soluble nitrogen into waterways or aquifers.

7. The regulatory frameworks governing the use of EIs amongst countries is varied and ranges from none or very little regulation, to very specific regulatory requirements. Regulation often depends on how these substances are used, that is whether as a chemical applied to pasture/crops or as a veterinary compound given to animals or as a medicated feed/feed additive. The report by the FAO on '*Food Safety Implications from the Use of Environmental Inhibitors in Agrifood Systems'* (see here) published in late 2023, described the challenges and opportunities associated with EIs, provides an excellent background overview. This report highlighted the regulatory frameworks for EIs in Argentina, Brazil and Chile and served to recognise and highlight the interest of Latin American countries in this technology.

8. To establish maximum residue levels (MRLs) for an EI, CCPR and CCRVDF look to members to put forward one or more compounds in accordance with the established procedures. The compound will then be assessed by the relevant risk assessment body. To undertake this risk assessment the FAO/WHO Joint Meeting on Pesticide Residues (JMPR) for CCPR and Joint FAO/WHO Expert Committee on Food Additives (JECFA) for CCRVDF calls for data to be supplied by the compound manufacturer. But the extent of the data requirements for this process are difficult to determine at this stage.

9. As a precursor to formal consideration of specific work proposals in relevant committees, New Zealand, in collaboration with FAO, the Codex Secretariat, host governments and interested member countries, convened a side event in the margins of the recent CCPR55 held 6 June 2024 in Chengdu, China. One hundred food safety regulators attended the meeting. The workshop started with opening remarks from the Chair of the Codex Alimentarius Commission from the UK (Steve Wearne) and the Vice Chair from New Zealand (Raj Rajasekar) which was followed by a presentation from the FAO Secretariat summarising countries regulatory approaches to the compounds. A technical expert from the US moderated the panel (Aaron Niman, Environmental Health Scientist and Policy Analyst, Environmental Protection Agency (EPA)) where a New Zealand food safety expert spoke (Warren Hughes) along with an expert from China (Dr Yongning Wu, Chief Scientist, China National Center for Food Safety Risk Assessment (CFSA); Vice President of Chinese Society of Toxicology). Discussions during the workshop were fulsome with representatives from several countries contributing about how the compounds are regulated in their countries.

10. Following on from this first event, New Zealand is organising a follow-up side event to be held at CCRVDF27 (21-25 October 2024, in Omaha, Nebraska, United States.

11. The purpose of these workshops is to:

    - inform and facilitate the recognition of the importance of EIs, discuss how different compounds are currently being used in countries with different agricultural production systems;
    - deepen the understanding of regulatory frameworks for EIs and how these differ between countries and between compounds products; and
    - clarify and facilitate better understanding and transparency about the data requirements for Codex risk assessments of these substances.

12. New Zealand looks forward to the input and participation of members of the CCLAC region in international discussions on this important topic.