

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

CL 2022/75-PR (Rev1)

February 2023

TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for comments on the need to enhance CCPR/JMPR and the associated opportunities and challenges

DEADLINE: 20 February 2023

BACKGROUND

1. At the 53rd Session of the Codex Committee on Pesticide Residues (CCPR53, 2022), concerns were raised that the current CCPR/JMPR system is unable to keep up with global demand for the evaluation of new compounds, uses, and periodic reviews. While the most recent deliberation at CCPR53 was prompted by the cancellation of JMPR meetings following the COVID19 pandemic, the growing demands on the Joint FAO/WHO Meetings on Pesticide Residues (JMPR) and its implications have been an important topic of discussion at several previous sessions of CCPR.
2. Most notably, FAO/WHO commissioned a 2002 review of the working procedures of JMPR¹ that was reviewed at CCPR34 and the JMPR Regular Meeting in 2002. Key findings from the 2002 FAO/WHO report are summarized below and remain relevant today:

"Whereas in the 1960s the JMPR monographs, which summarise the scientific data following a critical evaluation, were extremely brief in accordance with the standards of the time, the modern monographs are very detailed and extend to over one thousand pages for a particular Meeting."

"There has been a huge increase in the quantity of scientific data submitted for evaluation, and yet the JMPR only exists for two weeks of the year, in contrast to the situation at a national regulatory authority level."

"Financial resources available for this work have not increased proportionally leading to the generation of a backlog of pesticides waiting for review."

"The current JMPR system is also very vulnerable in that it relies on the goodwill of a limited number of individuals who work on a voluntary basis. These individuals, despite being internationally recognised in their fields, have to prepare the monographs without any financial reward and usually in their own personal time."

"Typically the Temporary Advisers of the WHO Core Assessment Group and Members of the FAO Panel have to spend the equivalent of 2-4 months full-time prior to the meeting preparing the monographs. The availability of suitable experts that are prepared to work on this basis is very limited."

3. In its review of the 2002 FAO/WHO report, CCPR34 confirmed that "JMPR was essential to the continued independent international evaluation of pesticide residues" but raised similar concerns that the increased demands on JMPR has resulted in a process that "had become unsustainable and without additional resources the system would fail sooner, rather than later."² JMPR re-iterated these concerns at its 2002 regular meeting, but also cautioned that making changes to the operational procedures of JMPR "requires considerable resources and the implementation could become counter-productive if it is no more than the introduction of one suggested change after another without an overall strategic direction."³ JMPR-2002 then concluded by recommending that FAO, WHO, and the Codex Alimentarius Commission prepare a strategic plan that can serve as a framework for future changes.

¹ Report on the Review of the Working Procedures of JMPR (English only), 2002. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf

² ALINORM 03/24, paras. 181-200, Report of the 34th Session of CCPR, 2002, Review of the Working Procedures of JMPR. Available in English, French and Spanish at: <https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-meetings/en/?committee=CCPR> or https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-34%252FAI03_24e.pdf

³ JMPR Report, General Considerations, Section 2.1: Needs of JMPR (English only), 2002. Available at: <https://www.fao.org/agriculture/crops/thematic-sitemap/theme/pests/jmpr/jmpr-rep/en/> or https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/Reports_1991-2006/Report_2002.pdf

4. There have been continued discussions on the increased demands on JMPR since FAO/WHO's 2002 report was published, but a strategic plan was never developed to guide future changes to JMPR. Therefore, CCPR is now revisiting whether there is a need to enhance the operational procedures of CCPR and JMPR and what associated opportunities and challenges may arise from these changes. This information will be used by CCPR and JMPR in 2023 to further explore how to improve the existing system to meet current and future demand for JMPR evaluations.

REQUEST FOR COMMENTS

5. Codex members and observers are invited to provide information on the need to enhance the operational procedures of CCPR and JMPR and the associated opportunities and challenges by providing replies to the questions below.⁴ This information will be used by CCPR and JMPR in 2023 to further explore how to improve the existing system to meet current and future demand for JMPR evaluations. The CL⁵ is available on the Codex website.

Question 1: Please comment on the need to enhance the operational procedures of CCPR/JMPR to (i) eliminate the backlog of compounds evaluations caused by the cancelation of JMPR meetings due to the COVID19 pandemic and (ii) expand its review capacity to meet the future demand. If possible, please organize your response using the suggested categories below.

1.1 Current workload of new compounds, uses, and periodic evaluations

1.2 Future workload demand for new compounds, uses, and periodic evaluations

1.3 Other reasons to enhance the operational procedures of CCPR/JMPR

Question 2: Please comment on opportunities to enhance the operational procedures of CCPR/JMPR to improve the efficiency of the evaluation process and increase JMPR's evaluation capacity. Please consider both opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes) in your comments. If possible, please organize your response using the suggested categories below.

2.1 Opportunities for Enhancement

2.1.1 Data Sponsor Dossier and Electronic Data Submission

2.1.2 CCPR Processes and Procedures

2.1.3 JMPR Evaluation Process and Procedures

2.1.4 JMPR Organizational Structure, Staffing and Resources

2.1.5 Other Areas of Enhancement

2.2 Opportunities for Major Reform

2.2.1 Use of National Reviews and Data

2.2.2 Alternative Peer Review Models

2.2.3 Other Areas of Reform

Question 3: For the opportunities you have identified, please comment on the anticipated challenges and propose possible solutions that may be implemented by CCPR and JMPR. This may include challenges related to resources, process and procedures, and governance.

Question 4: Codex members and observers are requested to provide feedback on the focus of additional stakeholder workshops that aim to expand upon the virtual stakeholder workshop sponsored by CropLife International on March 31, 2022 and summarized in CX/PR 22/53/20⁶. Please provide recommendations on key topics and themes for this follow-up workshop.

Questions 5: Do you have any further proposals or recommendation that are not covered by the four previous questions?

⁴ REP22/PR53, paras. 253-259, Report of the 53rd Session of CCPR, 2022. Available in English, French and Spanish at: <https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-meetings/en/?committee=CCPR> or 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%252FFREPORT%252FFINAL%252520REPORT%252FFREP22_PR53e.pdf

⁵ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/> or <https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

⁶ Available in English, French and Spanish at the CCPR53 website: <https://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCPR&session=53> or 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%252FFWDs%252Fpr53_20e.pdf

GUIDANCE ON THE PROVISION OF COMMENTS

6. Comments should be submitted through the Codex Contact Points of Codex members and observers using the OCS.
7. Contact Points of Codex members and observers may login to the OCS and access the document open for comments by selecting “Enter” in the “My reviews” page, available after login to the system.
8. Contact Points of Codex members and observers organizations are requested to provide proposed changes and relevant comments/justifications on a specific paragraph (under the categories: editorial, substantive, technical and translation) and/or at the document level (general comments or summary comments). Additional guidance on the OCS comment categories and types can be found in the OCS Frequently Asked Questions (FAQs)⁷.
9. Other OCS resources, including the user manual and short guide, can also be found on the Codex website⁸.
10. For questions on the OCS, please contact Codex-OCS@fao.org.

⁷ http://www.fao.org/fileadmin/user_upload/codexalimentarius/doc/OCS/Codex_OCS_FAQs_2017-11-06.pdf

⁸ <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>