

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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AGENDA ITEM NO. 4(C)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING
THIRTY-SIXTH SESSION
OTTAWA, CANADA, APRIL 28 - MAY 2, 2008

*GUIDELINES FOR THE PRODUCTION, PROCESSING,
LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS:
PROPOSAL FOR NEW WORK: DELETION OF ROTENONE FROM ANNEX 2*

GOVERNMENT COMMENTS

COMMENTS FROM:

INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS (IFOAM)

GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS:
PROPOSAL FOR NEW WORK: DELETION OF ROTENONE FROM ANNEX 2

GOVERNMENT COMMENTS

INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS (IFOAM):

At the last meeting Japan introduced a preliminary proposal for new work to delete rotenone from Annex Two, Table 2, citing concerns about the toxicity of this substance in aquatic systems, especially on fish. The CCFL agreed in 2006 not to take up rotenone unless Japan comes back to the CCFL with more comprehensive scientific analysis to have the new work item approved. Such documentation has been submitted and has been sent to the CCFL members and observer organisations.

IFOAM appreciates the work of Japan to evaluate rotenone against the Codex criteria and to include more data. IFOAM has until now listed rotenone in their basic standards for the following reasons:

- Rotenone is a potent insecticide. It is essential for the control of certain pests in certain crops, because the available alternatives (pyrethrums/pyrethrins, neem/azadirachtin) are not effective against all pests, or they are not legally allowed for these uses.
- Risk mitigation is an essential part of pesticide registration. In the case of rotenone, the toxicity to fish has been known for a long time, and appropriate restrictions of use are in place to ensure that rotenone does not leak into waterways. The risk of leakage into waterways is highly dependent on local geography, soil type and climate. As risk mitigation strategies are part of pesticide registration, it does not make sense to duplicate this work at the Codex Alimentarius level.
- . In countries where there are many commercial organic products on the market, the withdrawal of rotenone might not be consequential. However, rotenone is used in many countries, where withdrawal might have severe negative consequences due to the limited availability of alternatives.
- If rotenone is used, it is clear that poisoning of fish must be avoided.

In conclusion, IFOAM does support the Japanese initiative to restrict the use of rotenone to prevent flowing into waterways. However, IFOAM does not support the initiative to delete rotenone from Table 2, Annex 2.

IFOAM proposes that in the table under conditions for use a restriction is formulated, e.g. “not to be used, when risk for leakage into waterways”, after “Need recognized by the certification body or authority”.