

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

Agenda Item 9

CRD12
ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

50th Session
Haikou, P.R. China, 9-14 April 2018

Comments on ESTABLISHMENT OF CODEX SCHEDULES AND PRIORITY LISTS OF PESTICIDES FOR EVALUATION BY JMPR, submitted by China, European Union, Kenya and AgroCare

China

First, China appreciates the enormous work done by the EWG. Second, China supports to submit GAP information through the internet. China is willing to coordinate with the work of JMPR proactively to submit the approved GAP in China.

European Union

Mixed Competence

European Union Vote

The European Union and its Member States (EUMS) would like to thank Australia and Germany for the preparation of the schedules and priority lists of pesticides (2019-2022).

B2. NEW USES AND OTHER EVALUATIONS

For the 2019 schedule on new uses and other evaluations, 25 nominations for substances were made for which monitoring data will be made available for the listed commodities. In case data could be made available in the format JMPR agreed, the EUMS support the maintenance of these combinations in the list and their prioritisation on the basis of date-stamps.

Taking into account synergies with periodic review, consideration should also be given to the possibility to delay the evaluation of the monitoring data when the periodic review takes place the following year. This may be appropriate for diazinon, whose periodic review is scheduled in 2020.

B3. PERIODIC REVIEW

Concerning the periodic review priorities for 2019-2022, the EUMS welcome the changes in the priority order concerning the advancement of the evaluation of certain of these compounds for which the EUMS provided concern forms.

The EUMS note that the substances aldicarb, phosalone, fenarimol, dicloran and azinphos-methyl are not supported by a manufacturer and most of these pesticides are subject of public health concerns.

Therefore, EUMS propose the deletion of CXLs during CCPR 51 and the move of these compounds into "Table 1. List of pesticides whose MRLs (CXLs) or GLs have been deleted by the Codex Alimentarius Commission and for which no MRLs have been proposed", unless interested members / observers support the review of the pesticide.

The commitment of members/observers to provide data for the periodic review should be addressed to the Chair of the EWG on Priorities and the JMPR Joint Secretariat in front of CCPR 51. In this case the 4-years-rule will apply.

D. PRIORITY LISTS 2020 AND BEYOND – TABLE 2A AND 2B

The EUMS note the move of the active substance iprodione from 2020 schedule to the 2022 schedule. Due to the latest assessment of this compound by the European Food Safety Authority¹, the setting of an ARfD was found necessary and a stricter ADI was set. A consumer risk assessment is currently performed and a public health concern may be lodged if risks are identified.

¹ Peer review of the pesticide risk assessment of the active substance iprodione, [EFSA Journal 2016;14\(11\):4609](https://doi.org/10.29027/EFSAJ/2016/14(11):4609)

OTHER COMMENTS

2018 Schedule

The EUMS are aware that the 2018 schedule is closed but noted a possibility of coordination between CCPR/JMPR and CCRVDF/JECFA for the evaluation of the compound flumethrin.

The EUMS ask if an exchange of view took place regarding this coordination possibility and, as a general rule, if such coordination could be optimised for future schedules.

Kenya

Position: Kenya agrees with the schedules and priority list of pesticides prepared by the EWG as provided in the tables(table 1- the proposed schedule and priority list of pesticides and table 2- schedule and priority lists of periodic reviews) in the working document for the CCPR50.

Rationale: Establishment of MRLs will ensure public safety and facilitate trade in most of the pesticide/food combinations.

AgroCare

AGROCARE understand that the approach to review the pesticides active ingredients every 15 years is not reasonable, considering the need for those compounds for developing countries, the lack of a toxicological concern in some cases and current JMPR capacity. All these terms will be better justified below.

The protection of the human health is the most important purpose for the Codex Alimentarius's role and must be considered in the whole process. Initiate a revaluation without any new toxicological concern could generate extra workload to JMPR. The JMPR has previously set a quota of 11 compounds revaluations per year – quoted in CX/PR 16/48/14 para 12, discussed on CCPR 48th Session -, including new compounds and periodic reviews. The extensive number of periodic reviews without any toxicological reason contributes a lot for that huge burden being carried by the JMPR.

AgroCare alleges that the main reason for withdrawal of MRLs in Codex on the last years comes from the revocation of active ingredients as a result of non-support by the manufacturers. Under this situation, the withdrawal is made without any science grounds and goes against the rules governing the General Principles for Codex Alimentarius, which clearly states that all actions took by the CAC must be based on sound science and ensure fair practices on food trade.

In summary, we understand that a new toxicological concern for human health, in conjunction with new adverse effects to endangered species and the environment, should be the highest criteria to trigger a revaluation process.