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FOOD AND AGRICULTURE
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Agenda Item 18

CX/PR 03/18
January 2002

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Thirty-fifth Session

Rotterdam, The Netherlands, 31 March - 5 April 2003

REMOVAL OF AN EXTRANEOUS BURDEN FROM THE WORKLOAD OF THE JMPR

Prepared by the United States of America

The excessive workload of the JMPR is well-documented, and remedies to reduce the backlog and increase efficiency of the scientific review body are proposed from time to time. At the 34th CCPR, the *Review of the Working Procedures of the Joint FAO/WHO Meeting on Pesticide Residues*, prepared by a consultant to FAO and WHO, and CX/PR 02/14, 2002 were introduced and discussed. This document contained many suggestions on methods to improve the current processes, but the CCPR concluded that many of the recommendations were the responsibility of FAO and WHO (ALINORM 03/24, Paragraph 197). One of the General Items from the 2002 JMPR reiterates the severe resource problems of the JMPR and requests guidance from CCPR.

Among the recommendations of the *Review of the Working Procedures...* was article 7.8, which suggested that some of the data requirements for JMPR were unnecessary. One of these was information on Environmental Fate. This is an area where JMPR resources could be readily saved with no loss in the value of the product produced for CCPR. It is the understanding of the US Delegation that this matter has been informally discussed from time to time by the FAO Panel of JMPR, but that the Panel consensus has been that the matter was a policy issue that could only be decided by CCPR.

The environmental fate of pesticides is of importance to national regulatory authorities concerned with the spread, metabolism, and dissipation of pesticide chemicals in soil, air, and water from such sources as manufacturing, agricultural use, accidental spills, and disposal. A large portion of the work of the FAO Panel of the JMPR is the review of environmental fate data. According to the 2002 Edition of *FAO manual on the submission and evaluation of pesticide residues data for the estimation of maximum residue levels in food and feed*, various environmental fate in soil and water-sediment systems are reviewed. These include such topics as:

- metabolism and degradation in soil;
- persistence in soil under aerobic and anaerobic conditions;
- mobility of the parent compound and metabolites/degradates in soil
- adsorption by various soil types
- hydrolysis rate and products

photolysis rate

crop uptake and bioavailability of parent compound and degradates/metabolites

residues in rotational crops

soil dissipation

residue degradation in water-sediment systems

Of these topics, only residues in rotational crops is normally relevant to the needs of the CCPR. The mission of the CCPR is to establish maximum residue levels for food and feed commodities in international trade where dietary intake calculations indicate no dietary intake hazards to humans from the uses considered. While protection of the environment is a noble and necessary undertaking, it is not within the purview of the CCPR. Therefore, requiring the many environmental fate studies is an exercise with no practical end. Environmental fate may be one of those topics included under other legitimate factors, and might be considered if the JMPR had the luxury of excess resources. However, the opposite is true. The topic of environmental fate consumes many hours of the time of the JMPR scientists and (with the exception of rotational crop studies) yields nothing of value in the evaluation of dietary exposure and MRL estimation. The vast volumes of information are summarized, evaluated, and placed in the Report and Monogram of the JMPR. CCPR makes no use of the information.

One element of environmental fate studies is relevant to food/feed residues and should be retained. Confined rotational crops studies conducted with radiolabeled pesticides provide data on the fate of pesticides in soil and possible uptake by succeeding crops. Field rotational crop studies provide data on the magnitude of uptake by succeeding crops under GAP conditions.

The USA Delegation therefore proposes that the CCPR consider advising the JMPR to restrict its review of environmental fate to those areas specifically related to the estimation of dietary exposure and the estimation of MRLs. Likewise, manufacturers ought to be advised on any policy change in this area. Submissions in the environmental fate area would routinely be limited to confined and field rotational crop studies. Manufacturers could, as always, voluntarily submit additional environmental fate studies that they regard as germane in special situations.