

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 4a, 4b, 6, 7a, 7b, 7c, 7d, 8, 9, 11, 12, 13, 15

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

52nd Session

(Virtual)

26-30 July and 3 August 2021

Comments submitted by Uganda

Agenda Item 4a

Uganda would like to thank FAO and WHO sharing this information. We want to state that both the World Food Safety Day and UN Food System Summit 2021 are very important upcoming events for the continent. We look forward to joining other member states in these events.

We have also taken note of the update of chapters of the environmental Health Criteria 240-Principles and method for risk assessment. Such updates help to improve food safety. risk assessment approaches.

Agenda Item 4b

The Food and Agriculture Organization of the United Nations (FAO) and international Atomic Energy Agency (IAEA) Centre of Nuclear Techniques in Food and Agriculture work with Member Countries to contribute to food security and sustainable agricultural development by the use of nuclear techniques and biotechnology.

Activities of relevance to the CCPR include developing and using nuclear and isotopic analytical methods for the analysis and control of various chemical residues and food contaminants in agricultural products.

Uganda would like to welcome the report by the representative of IAEA. We want to thank IAEA for all the technical support it has been providing to most developing countries in strengthening both the human expertise and technical infrastructures of many analytical laboratories.

Justification: IAEA supported food safety regulatory framework training in which over 50 participants from 25 countries in the African region attended. It also supported 45 scientists who attended the Minor Use Foundation and Priority setting workshop, which was held on 21-22 September.

Agenda Item 6

During every session of CCPR as a standing agenda item JMPR secretariat submits the results of the evaluation of pesticide residues data and the proposed MRLs in food and feed for consideration by the session.

Uganda welcomes the report of the evaluation by JMPR.

Agenda Item 7a

Uganda agrees with the current structure of Class C. The revision that has been made accommodates all the processed feed commodities that have been moved from class D to Class C. The revised structure of Class C is as was agreed during CCPR50 and CCPR51. It will ultimately improve the calculation of animal dietary burden, to support establishment a maximum residue limits (MRLs), for animal commodities.

Agenda Item 7b

Uganda agrees with the conclusions and the recommendations of the EWG on the Revision of Class D Chaired by United States and co-chaired by the Netherlands.

Agenda Item 7c

During CCPR51 it was noted that major changes were still being proposed in the revision of Class C and it was premature to work in detail on Table 7 (Representative commodities, feed).

The Meeting also agreed that it was not possible to conclude on Table 8 (Representative commodities processed food commodities of plant) because there was no final conclusion on Class D.

It was agreed that further investigation be undertaken on which and how many representative crops for each class were possible.

The committee therefore concluded that for some commodities, it was not possible to have representative commodities due to the broad diversity of commodities in the group.

Uganda agrees with the list of representative commodities listed in Table 7. Examples of selection of representative commodities, Class C, Type 11 Primary Animal Feed Commodities. We also agree with Table 8 Example of the selection of representative commodities Class D, Processed Foods of Plant Origin

Justification: The proposed representative commodities allow for the setting of group and subgroup MRLs to help facilitate trade in variety of food commodities. The Principles and Guidance on the Selection of Representative Commodities for the extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups have been followed.

Agenda Item 7d

Uganda would like to thank the EWG chaired by the United States and co-chaired by the Netherland for preparing the document CX/PR 20/52/9.

Uganda supports the earlier decision that no changes would be made to CXLs until a time when the JMPR reviews were complete as per the current procedure for establishing Codex schedules and priority list of pesticides.

Agenda Item 8

Uganda thanks the electronic working group led by Chile, India and United States of America.

Uganda supports the work on the proposed guidance for compounds of low public health concerns that may be exempted from the establishment of CXLs.

Uganda would also like to recommend that the document be progressed to the next step of 5-8 so that member countries can give the document more scrutiny.

Agenda Item 9

Uganda appreciates Iran and Costa Rica for leading the EWG on the preparation of the discussion paper on the review of mass spectrometry provisions in the two guidelines.

Uganda recommends the re-establishment of the EWG and new TORs given to the new EWG with submission of the report at the next CCPR Session.

Justification: The EWG could not find common grounds to whether TOR (i) adequately addresses the issue at hand or whether there is a need to proceed to addressing TOR (ii).

Agenda Item 11

Uganda is in support of the recommendations.

Uganda recommends that there is no need to establish new EWG.

Justification: The methodology allows a transparent estimation of expected short-term dietary exposure to pesticide residues and promotes global harmonisation of risk management decisions. For adults the 97.5% percentile of acute dietary exposure was <10% ARfD, for children <50% ARfD therefore the IESTI equation is protective enough for acute risk. From the study, there was zero risk of exceeding the ARfD in all the countries and subpopulation of adult/children. Harmonised risk assessment methodologies promote the acceptance of food standards (Setting Codex MRLs) at international level, hence reducing non-tariff trade barriers.

Agenda Item 12

Uganda welcomes the formation of the EWG to propose principles and procedures to enable the participation of the JMPR in parallel reviews of a new compound to accelerate the setting of Codex MRLs and support MRL harmonization.

Uganda also notes that establishment of a successful parallel review process will require some flexibility to address challenges collaboratively and refine the process iteratively.

Justification: Uganda believes that the proposed parallel review process would shorten the time taken for the elaboration of MRLs in the CCPR process, and increase harmonisation in the outcome.

Agenda Item 13

Uganda thanks Canada, Chile, India and Kenya for leading the preparation of the discussion paper on the management of unsupported compounds without public health concerns.

Uganda recommends that more data be submitted for evaluation by JMPR.

Agenda Item 15

Uganda is in support of the recommendations to schedule compounds for periodic review by JMPR.

Justification: The priority lists of pesticides for evaluation by JMPR corresponds to Step 2 of the Codex step procedure for the elaboration of maximum residue limits (MRLs) for pesticides for evaluation by JMPR at its meeting subsequent to the last session of CCPR.

Most of the compounds scheduled for evaluation comply with the requirements for data submission to JMPR and are in accordance with the procedures described in the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues (Procedural Manual of the Codex Alimentarius Commission).

Most of the tropical crops scheduled for evaluation are grown in the African region and the numbers of compounds on the new and follow-up evaluations are registered for use on the continent.