

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 6

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CODEX COMMITTEE ON PESTICIDE RESIDUES

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Comments submitted by Australia

Agenda Item 6

CX/PR 24/55/5 – CL 2024/44-PR

MRLs for pesticides in food and feed (at Steps 7 and 4)

AUSTRALIAN CRD ON THE NEED FOR THE TIMELY UPDATE OF CODEX DOCUMENTATION

Introduction

1. The primary objective of the CCPR is the establishment of international Maximum Residue Limits (CXLs) for pesticides in food and feeds to protect the health of consumers and to ensure fair practices in food trade.
2. Codex members, agricultural industries and other stakeholders rely on CXLs as the benchmarks for movement of agricultural produce in international trade. The Codex pesticide CXL database is the reference point used for this purpose. It is therefore essential to keep the database up-to-date and always correct in detail.
3. The description of commodities and commodity groups to which Codex CXLs apply, and how CXLs may be extrapolated from commodities to commodity groups, is fundamental to understanding and interpreting Codex CXLs.

Key Issues

4. In recent years, the Codex CXL database has not been updated to reflect decisions made by CCPR and adopted by the CAC until well after the relevant CAC meeting.
5. Changes to the Codex CXL database following revision of the Codex Classification have not been implemented several years after they became necessary.
6. Errors and omissions in the Codex MRL database can be identified when there is need to closely examine the history of listed CXLs.
7. The Codex Classification of Foods and Animal Feeds (CXA 4-1989) was last updated in 1993.
8. CXG 84-2012, Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Groups was last updated in 2017.

CXL Database

9. The Codex CXL database is the sole publicly free source of MRLs that apply to commodities traded internationally. It defines the important work that CCPR does to ensure the safety of traded produce. Many countries and markets for agricultural produce rely on Codex MRLs for trade. Trade in agricultural commodities may be compromised if incorrect or superseded MRLs are listed in the database.

10. At 53CCPR, an observer noted that the Codex CXL database had not been updated following decisions made at 52CCPR (REP22/PR53, para 9). The Codex Secretariat informed the Committee that it was expected that the database would be updated within 1 month, certainly no more than 2 months, after a CAC meeting.
11. Necessary changes to the MRL database following revision of the Codex Classification, Class A (Primary Food Commodities of Plant Origin) were considered by 52CCPR with reference to a consultancy report presented to the Committee (CX/PR 21/52/11, REP21/PR Paras 186-189). The Committee agreed to consider the matter further at its next Session, however, the topic was not listed on the agenda for 53CCPR. A CL which was to request comments on the proposed measures set out in CX/PR 21/52/11 (Parts I & II) was not distributed before 53CCPR as planned (REP21/PR, para 187). The Codex Secretariat informed 53CCPR that the work was on-going, but the original consultant was unable to complete the work. The Secretariat informed 54CCPR that it was difficult to identify a suitable consultant for the work. At 46CAC, the Vice-chair and Chair of CCPR stressed the importance of completing this work. (REP23/CAC, para 111).
12. The MRL for phosmet in pome fruit has not been corrected as agreed by 52CCPR (REP21/PR, para 53). CCPR has rightly scheduled phosmet for periodic review in 2024, but the erroneously high CXL (10 mg/kg instead of 3 mg/kg) led to inflated dietary intake estimates when the IESTI equations were under review, for example, in the publication of Crepet, A. et al., Food Control 121 (2021).
13. Other errors in the database include listed CXLs for acephate in cabbages, head and tomato (revoked by 37CCPR in 2005) and the CXL for carbaryl in sorghum (revoked by 36CCPR in 2004).
14. The 40CCPR (Alinorm 08/31/24, para 162) agreed that when the JMPR recommended MRLs for both whole milk and milk fat, a note should be added alongside the MRL for whole milk, stating that 'for monitoring and regulatory purposes, whole milk is to be analysed and the result compared with the MRL for whole milk'. It appears that this measure was never put in place.

Other Related Documentation

15. CXA 4-1989 'Codex Classification of Foods and Feeds' was last updated in 1993. Revision of the Classification was first discussed at 34CCPR (2003) and completed at 54CCPR (2023).
16. CXG 84-2012 'Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Groups' was last updated in 2017. Tables 1-3 covering fruits, vegetables, and grasses, are included in the current version of the Guideline. Work on the Guidelines was completed at 54CCPR with agreement on Tables 9 and 10.

Recommendations

17. It is recommended that CCPR request that:
 - resources be made available to update the Codex CXL database within 1 month of each CAC meeting,
 - as a matter of high priority, action be taken to ensure that the Codex CXL database is updated to reflect changes to CXLs and commodity groups made necessary by revision of the Codex Classification and report the results of such action to 56CCPR.
 - work, to be completed within 2 years after 55CCPR, be initiated to check the validity of all CXLs listed in the Codex CXL database, and to report the results of such action to 57CCPR.
 - updates be made to CXA 4-1989, Codex Classification of Foods and Feeds, to reflect all decisions made by CCPR up to 54CCPR and adopted by the Codex Commission up to 46CAC.
 - updates be made to CXG 84-2012 to reflect all decisions made by CCPR up to 54CCPR and adopted by the Codex Commission up to 46CAC.