

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

55th Session

Chengdu, Sichuan province, People's Republic of China

3-8 June 2024

Comments submitted by Uganda

Agenda Item 3

CX/PR 24/55/2

Matters referred to CCPR by CAC and/or other subsidiary bodies

Uganda appreciates CCPR and CAC for sharing information. Uganda would like to state that, as a country reaffirms her commitment and support to work being done by Codex.

Uganda will keep track of the events mentioned in the report and will participate in the work by the committee.

Uganda is willing to provide comments on the vision, mission, core values, drivers for change, the role of Codex and a high-level description of the Codex ways of working of the Codex strategies.

Agenda Item 4(a)

CX/PR 24/55/3

Matters arising from FAO and WHO

Uganda would like to thank FAO and WHO for the work done.

- i. Following the 16th annual JMPM convened in November 2023 in Geneva, Switzerland, focusing on various issues such as the creation of new guidance documents, updates to existing guidelines, and addressing emerging and priority issues in pesticide management, including online sales, drone applications, illegal trade, and nano-pesticides among others.

The JMPM endorsed new Guidance on Aerial Application of Pesticides and released updated guidance in 2023 on the use of pesticide regulations to prevent suicides and on monitoring and adherence to the Code of Conduct.

Uganda is in support of all the activities which were highlighted during the 16th annual meeting which took place in Geneva.

Rationale: Uganda takes note of matters arising from FAO and WHO on various activities. The revision of the existing guidelines and development of new guidelines will address emerging issues such as the use of drones, illegal trade, online trading, and nano pesticides among others. As we embrace technology, unforeseen challenges require an update and review of guidelines to address emerging issues.

- ii. During the 22nd meeting of the JMPS held in June 2023 in Braunschweig, Germany, the session reviewed 11 FAO, 7 WHO, and 11 joint FAO/WHO pesticide specifications. The discussions also covered topics such as revisions to the data entry template for proposers, JMPS operation manual, requirements for additional production sites from the same manufacturers, and the re-evaluation of existing FAO specifications.

Additionally, JMPS endorsed a Manual on the Development and Use of FAO and WHO Specifications for Microbial Pesticides aimed at enhancing the development and quality assurance of biopesticides.

Uganda is in support of the outcome of the 22nd meeting of the JMPS which was held in June 2023 in Braunschweig, Germany.

Rationale: The reviewed pesticide specifications, new documents as well as assured quality of biopesticides are expected to enhance regulatory processes, promote quality low risk alternatives and hence promote food safety and environmental health. The manual on the development and use of FAO and WHO specifications for Microbial Pesticides will provide the appropriate quality assurance during the production of biopesticides in Uganda as well as the African region.

- iii. Uganda appreciates the FAO for all the capacity development initiatives in the African, Asian and Near East Regions. Uganda would like to recommend that a similar training on risk assessment and MRL settings be organized for the African region.

Rationale: Several African countries have benefited from the FAO pesticide registration tool kit training and are currently using the tool kit. The above-mentioned activities will enhance the participation of African countries in Codex and strengthen the risk assessment framework.

- iv. Uganda appreciates the FAO and other Partners for undertaking this initiative to mitigate risks associated with highly hazardous pesticides in the world. Uganda would also like to appreciate the development of a guidance document on HHP and the creation of regional and national strategies to manage HHP in Africa.
- v. Uganda is in support of the goals and activities presented by WHO. Uganda recognizes their impact on improving human health and agricultural productivity on the continent. Uganda is therefore committed to continue collaborating with WHO to enhance pesticide management, reduce risks associated with hazardous substances, and improve food safety standards.

In addition Uganda advocates for continued support in building local capacities and expanding resources to address these issues comprehensively.

Agenda Item 4(b)

CX/PR 24/55/4

Matters arising from other international organizations

Uganda appreciates the work done by the FAO and IAEA in their extensive capacity-building efforts, particularly in enhancing laboratory infrastructure and competencies across the continent. These initiatives are crucial for Uganda as well as Africa, enabling accurate monitoring and regulation of pesticide residues and related food safety hazards, thus safeguarding public health and facilitating compliance with international food safety standards. African Union encourages the continuation and expansion of such programs to further strengthen Africa's capabilities in food safety management.

Finally, Uganda also congratulates the Joint FAO/IAEA Centre of Nuclear Techniques in Food and Agriculture (Joint FAO/IAEA Centre) for celebrating 60 years of its establishment as a centre of excellence and capacity building for several countries in the world especially in Africa.

Agenda Item 5(a)

Section 2 of the 2023 JMPR Report

Report on items of general consideration arising from the 2023 JMPR meeting

Uganda agrees with the report submitted by JMPR. However, Uganda would like to recommend that there should be transparency throughout the transition process from the use of the IEDI methodology to the GECDE methodology and that the issues arising from conservation be well addressed. In addition, Uganda would also like to recommend more capacity building in this area during the transition.

Justification: Uganda notes that the gradual transition from the IEDI methodology to the GECDE methodology for estimating chronic dietary exposure provides the potential to provide more accurate assessments reflective of diverse consumption patterns across the continent. This is aligned with efforts to enhance the scientific rigor and relevance of pesticide residue assessments in African contexts and to ensure that global standards are effectively tailored to meet public health and safety requirements.

Agenda Item 5(b)**Section 3 of the 2023 JMPR Report****Report on responses to specific concerns raised by CCPR arising from the 2023 JMPR meeting**

Uganda appreciates the JMPR for being able to comprehensively address the issues raised in the concern forms and agrees with the outcome of their conclusions on the matters raised. We would also like to note the public health concerns on the leaf lettuce and spinach in the JMPR report of 2022 and if possible, an alternative GAP should be identified in future to address this concern.

Agenda Item 6**CX/PR 24/55/5 – CL 2024/44-PR****MRLs for pesticides in food and feed (at Steps 7 and 4)**

Uganda appreciates the work done by JMPR and for undertaking the risk assessment of pesticide/commodity combinations for both toxicological and residue data provided from several studies. Uganda is in support of the proposed MRLs for the evaluated pesticides mentioned below:

1,4- Dimethylnaphthalene (331), Acetamiprid (246), Boscalid (221), Clothianidin (238), Cyantraniliprole (263), Cyflumetofen (273), Deltamethrin (135), Difenoconazole (224), Diflubenzuron (130), Dinotefuran (255), Florylpicoxamid (332), Fluopyram (243), Imazapyr (267), Iprodione (111), Isocycloseram (334), Isoflucypram (330), Isotianil (335), Mepiquat-chloride (336), Oxathiapiprolin (291), Propiconazole (160), Tetraniliprole (324), Thiamethoxam (245), Thiophanate-methyl (077), Tricyclazole (337) and Zeta-cypermethrin (118).

However, where no trial matched the GAP and or insufficient data cited in the cases of Pyrethrins (063), Prochloraz (142), Piperonyl butoxide (062), Permethrin (120) and Carbendazim (72), Uganda would like to propose that these missing data should be provided by the sponsors.

Uganda is not in support of the proposed MRLs for Broccoli due to the use of iprodione and MRLs for eggplant and mango due to the use of carbosulfan.

Uganda further more recommends the use of alternative GAP in future for the estimation for a lower highest residue (HR). There is a possible refinement of broccoli using a processing factor

Rationale:

Uganda takes note of the outcomes of the JMPR 2023 evaluations, which confirmed that there were no exceedances of the Acceptable Daily Intakes (ADIs) or the Acute Reference Doses (ARfDs) with the proposed Maximum Residue Limits (MRLs). This finding underscores the protective nature of the established MRLs with respect to public health and will ultimately promote international trade.

The meeting did point out that for carbosulfan and iprodione, there were public health concerns due to short-term dietary intake exceeding the acute reference dose (ARfD). For iprodione, the exceedance of the ARfD for broccoli were 190% (Toddlers, 8-20 months in Netherlands) and 160% (Children ≤ 6 yrs in Canada).

For carbosulfan, the exceedance of the ARfD for Mango was 310% (Toddler 8–20 months, Netherlands), for Eggplant were 210% (Children 1–6 yrs, China) and 120% (General population >1 yrs, China)..

Agenda Item 7

CX/PR 24/55/6 – CL 2024/45-PR

Guidelines for monitoring the purity and stability of reference materials and related stock solutions of pesticides during prolonged storage (at Step 4)

Uganda appreciates the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Uganda supports the progression of work on the harmonized guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage through the Codex step procedure.

Rationale: The guidelines will help laboratories overcome the shortcomings faced while monitoring the stability of reference materials and related stock solutions of pesticides during prolonged storage. It will also contribute to credibility, cost reduction and efficiency of pesticide residue monitoring systems and therefore help to ensure food safety and facilitating international trade.

Agenda Item 8

CX/PR 24/55/7 – CL 2024/46-PR

Management of unsupported compounds without public health concern scheduled for periodic review

Uganda appreciates the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Uganda proposes further consideration to request for data to retain the CXLs of the revoked molecules as CCPR requests for data for JMPR evaluation since there are no public health concerns.

Justification: Amitraz is a dual use compound that is highly used to control mites in crops and ticks in animals which are pests of economic importance in many countries. Fenthion is of importance in the control of desert locust.

Agenda Item 9

CX/PR 24/55/8 – CL 2024/47-PR

National registrations of pesticides

Uganda appreciates the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Uganda notes that the current approach is effective but can further be strengthened by supporting member countries to develop national registration databases for pesticide/crop combination. Uganda commits to submit data on registration of pesticide/crop combinations from their databases for use by CCPR and JMPR.

Justification: These responses can be continuously used to review unsupported compounds with no public health concern. Uganda is currently generating data on the various pesticides that can be included in the national registration.

Agenda Item 10

CX/PR 24/55/9 – CL 2024/43-PR

Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR

Uganda appreciates the Chair and the Co-Chair of the EWG for guiding this discussion.

supports the proposed schedules and priority lists of pesticides provided in CL 2024/43-PR

Justification: All the compounds in the proposed schedules and priority list have confirmed registration status and guarantee of data availability from studies.

Agenda Item 11

CX/PR 24/55/10 – CL 2024/48-PR

Enhancement of the operational procedures of CCPR and JMPR

Uganda appreciates the United States and the other EWG co-chairs for leading this work. Uganda supports the approach recommended in the EWG report. Uganda believes that this will facilitate CCPR in reviewing feedback from JMPR and subsequently devising a long-term strategy for establishing priorities and crafting an implementation roadmap.

Justification: The proposed short- and long-term intervention will help reduce the backlog of compounds due for risk assessment by JMPR.

Agenda Item 12

CX/PR 24/55/11 – CL 2024/49-PR

Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF Working Group on Compounds for Dual Use – Status of Work

Uganda appreciates the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Uganda is in support of the initiatives of the Joint CCRVDF-CCPR Working Group and agrees with the proposal to convene a Virtual Joint Physical Working Group. Given the challenges highlighted by the Chair and co-Chairs, the discussion of the current Terms of Reference (ToRs) must occur within this joint setting.

Recommendation: Uganda would also like to encourage the participation of all the member countries who have registered in the EWG.

Agenda Item 13

CX/PR 24/55/12 – CL 2024/50-PR

Analysis of previous decisions by CCPR to establish MRLs for tomato and pepper to establish corresponding MRLs in eggplant

Uganda appreciates the Global Pulse Confederation (GPC) for the elaborate analysis of the representative commodities for Subgroup 12C Eggplant and eggplant-like commodities which involves the addition of chilli and sweet peppers. Uganda is in agreement with the outcome of this analysis and the recommendations for CCPR to consider the establishment of MRLs listed in the Table presented in Appendix I in the Subgroup of Eggplant (VO2046).

Justification: The establishment of Codex MRLs for eggplant, a minor crop using extrapolation to pepper will help facilitate trade in this commodity