

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Comments submitted by Ghana

Agenda Item 6

CX/PR 24/55/5 – CL 2024/44-PR

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

Position: Ghana thank the JMPR for undertaking the risk assessment of pesticide/commodity combinations for both toxicological and residue data provided from a number of studies. Ghana supports the proposed MRLs for the evaluated pesticides Acetamiprid (246) and (273), Deltamethrin.

However, where no trial matched the GAP and or insufficient data cited in the cases of Permethrin (120) and Carbendazim (72), Ghana would like to urge the sponsor to provide the requisite data for the review.

Rationale: Ghana recognizes 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.

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)

Position: Ghana thank the Chair and co-chair for the EWG for the work done and all the member countries who participated in the advancement of this work. Ghana 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

Position: Ghana thanks the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Ghana 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.

Rationale:

Agenda Item 9**CX/PR 24/55/8 – CL 2024/47-PR****National registrations of pesticides**

Position: Ghana thanks the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Ghana supports the initiative and would endeavor to contribute to the success of the work.

Rationale: These responses can be continuously used to review unsupported compounds with no public health concern.

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**

Position: Ghana would like to thank the chair of the EWG. Ghana supports the proposed schedules and priority lists of pesticides provided in CL 2024/43-PR.

Rationale: 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**

Position: Ghana thanks CropLife International for presenting a discussion paper, United States and the other EWG co-chairs for leading this work. Ghana supports the approach recommended in the EWG report. Ghana supports the approach recommended in the EWG report.

Rationale: The proposed short- and long-term intervention will help reduce on 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**

Position: Ghana thanks the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. The Ghana supports 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, it is important that the discussion of the current Terms of Reference (ToRs) occurs within this joint setting.

Recommendation: Ghana 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**

Position: Ghana thanks the Global Pulse Confederation (GPC) for this elaborate analysis of the representative commodities for Subgroup 12C Eggplant and eggplant-like commodities which involve the addition of chilli and sweet peppers. Ghana agrees 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).

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