

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 11

CX/PR 24/55/10-Add.1

May 2024

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Fifty-fifth Session

Chengdu, Sichuan province, People's Republic of China

3-8 June 2024

ENHANCEMENT OF THE OPERATIONAL PROCEDURES OF CCPR AND JMPR

Comments in reply to CL 2024/48-PR

submitted by

Canada, Chile, Cuba, Egypt, Iraq, Peru, Saint Kitts and Nevis,

United Arab Emirates (UAE) and United Kingdom (UK)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/48-PR¹ issued in April 2024. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

GENERAL COMMENTS

COMMENT	MEMBER/OBSERVER
<p>Short-term approaches</p> <p>I.1 Convene an extraordinary meeting of JMPR to reduce the backlog of new use evaluations.</p> <ul style="list-style-type: none"> • Canada would have no objection in convening an extraordinary meeting of JMPR to address the backlog of new uses, provided there are sufficient experts that would be available to attend this extra meeting, without compromising their valuable contributions to the yearly JMPR meeting. In turn, the national regulatory authorities must also be supportive of their experts potentially attending two separate meetings in one year. • The logistics of having an extraordinary meeting would also be contingent upon additional funding from FAO/WHO, unless a national regulatory authority volunteers to subsidize such a meeting. • All new uses nominated for this extra meeting must be closely screened to ensure the dossiers are complete, accompanied by the required registered GAP(s) and not include any new information that may warrant a revision to the residue definitions, which is very time consuming. • Should there be agreement in holding an extraordinary meeting of JMPR to recommend several MRLs for many new uses, this may potentially increase the CCPR workload of adopting an even more extensive list of MRLs during its plenary session. <p>I.2 Complete a targeted project that improves JMPR's evaluation process.</p> <ul style="list-style-type: none"> • It is Canada's understanding that one of the impediments to the JMPR evaluation process is the lack of high quality complete dossiers submitted by sponsors, oftentimes resulting in rolling submission of data, as captured in the 2023 JMPR Report under general considerations item 2.5. • Timely submission of complete dossiers to the JMPR experts would also improve the evaluation process. The deadline to submit dossiers to JMPR experts is typically end of December, the year prior to the JMPR meeting. This deadline should be strictly adhered to by sponsors as it would allow sufficient time for JMPR experts to screen the data for completeness. Should any data be lacking or dossiers considered incomplete, it would allow sufficient time to ensure these are addressed or the opportunity for JMPR to review another compound on the list of reserve compounds, where the dossier is complete and available. • Canada would support the adoption of a standardized format to submit dossiers that JMPR experts can rely on where only a QA/QC of the information would be required together with the addition of their recommendations, based on their science policies. • Canada would also support the use of OECD recommended formatting and naming conventions for study reports to add efficiencies to the process. <p>Long-term approaches</p> <p>II.1 Request recommendations from JMPR and data sponsors on enhancements to policy and procedural Issues.</p> <ul style="list-style-type: none"> • Canada agrees that there is significant benefit to resolving specific policy and procedural challenges, understanding that doing so could potentially result in an increased JMPR review capacity. However, these will need to be discussed in detail such that an overall consensus can be reached and a process can be developed and implemented, perhaps with the assistance of a third party (see below). 	<p>Canada</p>

COMMENT	MEMBER/OBSERVER
<p>II.2 Request that FAO/WHO conduct an organizational assessment and review the working procedures of CCPR and JMPR.</p> <ul style="list-style-type: none"> Canada supports the recommendation to consult with a third-party to conduct an independent organizational assessment of CCPR and JMPR, by identifying priorities and developing a strategic roadmap with timelines to address challenges. However, the success of such an initiative is contingent upon the availability of resources and expertise. 	
<p>La delegación de Chile agradece el trabajo realizado por el grupo de trabajo por medios electrónicos, con las siguientes observaciones, respecto a lo solicitado en la carta circular CL 2024/48-PR:</p> <ol style="list-style-type: none"> En términos generales Chile apoya la propuesta, pero considera que es necesario reordenar y precisar más aún las iniciativas, junto con reducir el corto plazo al 2025, de manera de abordar lo más urgente y luego focalizarse en la evaluación del actual procedimiento, para modificar y optimizar lo que sea necesario. Dentro de los enfoques a largo plazo, se sugiere dejar el “desarrollo de un proceso para implementar los cambios necesarios” y la “actualización del manual de procedimientos” como últimas actividades, previa entrega a FAO/OMS del listado consensuado de políticas y cuestiones de procedimiento que se podrían modificar para aumentar la capacidad de revisión de la JMPR, como insumo para su evaluación. De acuerdo con lo señalado, las iniciativas podrían simplificarse de la siguiente manera(Es el mismo texto pero simplificado mas la ideal del ultimo párrafo): <p><u>Corto plazo 2024-2025</u></p> <p>Convocar una reunión extraordinaria de la JMPR para reducir la acumulación de evaluaciones de nuevos usos.</p> <p>Pese a que la JMPR ha expresado su preocupación por que las reuniones adicionales requieren muchos recursos y pueden no aumentar los resultados a largo plazo de la JMPR, una reunión extraordinaria específica que se centre en evaluaciones de nuevos usos puede ayudar a reducir el retraso de las evaluaciones. La convocatoria de una reunión extraordinaria requerirá coordinación con las partes interesadas para:</p> <ul style="list-style-type: none"> - confirmar que hay recursos, personal y expertos disponibles para apoyar la reunión, identificar propuestas de compuestos a ser revisados, y - determinar la capacidad de revisión para esta reunión. <p><u>Largo plazo 2025-2028</u></p> <p>*(titulo)Desarrollo de proyecto específico para la presentación electrónica de datos y los estándares de calidad de los datos.</p> <p>Este proyecto específico requerirá coordinación con las partes interesadas para:</p> <ul style="list-style-type: none"> - consultar a la JMPR para identificar requisitos - detallar el alcance del trabajo y el impacto en el proceso de evaluación de la JMPR, y - confirmar que hay recursos y experiencia disponibles para terminar el proyecto. <p>*(titulo)Solicitar recomendaciones de la JMPR y los patrocinadores de datos sobre mejoras en cuestiones de políticas y procedimientos.</p> <p>El GTE recopiló previamente información de una serie de miembros del Codex y organizaciones observadoras sobre oportunidades para mejorar o reformar los procedimientos operacionales del CCPR y la JMPR. A partir de esa información, el CCPR podría identificar cuestiones específicas de política y procedimiento que se pueden abordar para aumentar la capacidad de revisión. Esto requerirá coordinación con las partes interesadas para:</p>	<p>Chile</p>

COMMENT	MEMBER/OBSERVER
<p>- llegar a un consenso sobre las políticas y cuestiones de procedimiento para aumentar la capacidad de revisión de la JMPR, y</p> <p>- entregar listado consensuado a FAO/OMS como insumo para su evaluación</p> <p>*(titulo)Solicitar que la FAO/OMS realicen una evaluación organizacional y revisen los procedimientos de trabajo del CCPR y la JMPR.</p> <p>Puede haber ventajas de consultar a una organización externa para aprovechar la Revisión de 2002 de los procedimientos de trabajo de la JMPR y listado de políticas y cuestiones de procedimiento consensuadas para aumentar la capacidad de revisión de la JMPR, para realizar una evaluación organizativa independiente del CCPR y la JMPR. El objetivo de tal iniciativa podría ser identificar prioridades y desarrollar una hoja de ruta estratégica y un calendario para abordar problemas de larga data relacionados con la capacidad de revisión de la JMPR, el personal, los recursos y el modelo operacional de la JMPR. Esto requerirá coordinación con las partes interesadas para:</p> <p>- consultar a la JMPR sobre las metas y objetivos generales de una evaluación organizacional independiente, y</p> <p>- confirmar que hay recursos y experiencia disponibles para terminar el proyecto.</p> <p>*(titulo)CCPR revisa y analizar los resultados de la Evaluación Organizacional para:</p> <p>- sancionar las políticas y cuestiones de procedimiento que se deben cambiar para aumentar la capacidad de revisión de la JMPR</p> <p>- desarrollar un proceso para implementar cambios, y</p> <p>- actualizar el manual de políticas y procedimiento del Codex según corresponda</p>	
<p>Cuba agradece la oportunidad de responder la carta circular CL 2024/48-PR y consideramos en principio apoyara las recomendaciones relacionadas con los enfoques a corto y largo plazo para avanzar en el trabajo de mejor de los procedimientos operacionales del Comité del Codex sobre Residuos de Plaguicidas (CCPR) y la Reunión Conjunta FAO/OMS sobre Residuos de Plaguicidas (JMPR).</p>	Cuba
<p>Egypt appreciates the work which done to determine operational procedures of the Codex Committee on Pesticide Residues (CCPR) and the Joint FAO/WHO Meeting on Pesticide Residues (CCPR) and agrees on it.</p>	Egypt
<p>Agree with the proposal</p>	Iraq
<p>La Comisión Técnica Nacional de Residuos de Plaguicidas agradece al Comité del Codex sobre Residuos de plaguicidas por él envió de la carta circular CL 2024/48-PR Solicitud de comentarios sobre las recomendaciones para mejorar los procedimientos operativos del CCPR y la JMPR.</p> <p>La Comisión NO tiene observaciones o comentarios sobre las recomendaciones para mejorar los procedimientos operativos del CCPR y la JMPR.</p>	Peru
<p>St. Kitts & Nevis has no issues with the propositions made in Appendix II or sections 3,4 and 5. The proposal is reasonable however, I am not clear on I.1.1 on how the capacity for appropriate review will be determined.</p>	Saint Kitts and Nevis
<p>Regarding the proposed short-term and long-term approaches presented in Appendix I of the discussion paper prepared by the EWG on the enhancement of the operational procedures of CCPR and JMPR, United Arab Emirates recognizes the efforts done by CCPR/JMPR to close the increased work required for pesticide evaluation.</p>	United Arab Emirates

COMMENT	MEMBER/OBSERVER
<p>United Arab Emirates agrees with the short-term approach and would like to add some suggestions for the long-term approach. CCPR should identify and implement a process for training experts to join JMPR which will help to avoid the long procedure of JMPR expert election.</p> <p>Also, the long-term approach should include the development of software tools to data submission which will facilitate the evaluation of data that will be used for MRL setting. In this context, member countries could transfer their knowledge in developing such a software.</p>	
<p>The UK fully supports the work undertaken to enhance the procedures of the CCPR and JMPR to reduce the backlog of evaluations.</p>	<p>United Kingdom</p>
<p>I.1 Convene an extraordinary meeting of JMPR to reduce the backlog of new use evaluations.</p> <p>It is important to recognize the resources of the JMPR, including the availability of experts to attend additional meetings of the JMPR. The UK understands that the additional/ extra meetings in 2019 and 2021 were successful. If the focus of the extra meetings are on new uses only, then would it be an option for these to take place virtually, rather than having physical meetings? A focus on new uses only may also help to build capacity as there may be experts who can contribute to such work, but would not yet be suitable to undertake the more challenging assessments (new active substances, periodic reviews).</p> <p>For new uses only, where the JMPR has established suitable endpoints, such as the residue definitions and toxicological reference values, it should be considered whether the JMPR needs to undertake a full evaluation of the data. The recommendations of the JMPR in such assessments could be based on a critical review of a relevant jurisdiction's assessment.</p>	
<p>I.2 Complete a targeted project that improves JMPR's evaluation process.</p> <p>The UK fully supports the idea of undertaking a targeted project, and hopefully this will identify changes that can be made that lead to reducing the evaluation backlogs.</p> <p>It is the UK's experience of undertaking the JMPR work, that the dossier submissions by sponsors vary considerably in their quality. The summaries and tables of the data often do not reflect how the information and data are presented in the JMPR evaluation and reports. Significant improvements in such submissions would aid the resources of the JMPR.</p> <p>It should be considered whether incomplete or poor quality dossiers should be rejected, and these would then need to be schedule for submission at a later date.</p>	
<p>II.2 Request that FAO/WHO conduct an organizational assessment and review the working procedures of CCPR and JMPR.</p> <p>In principle, a review of the working procedures of the JMPR and the CCPR by a third part organisation may be advantageous. However, to ensure this, it will be important that the organization tasked with the review has a track record of undertaking similar reviews and has access to relevant experts so they can build up a working knowledge of the JMPR and CCPR.</p>	