

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda item 9

CX/PR 24/55/8-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

### NATIONAL REGISTRATIONS OF PESTICIDES

Comments in reply to CL 2024/47-PR

submitted by

Canada, Chile, Colombia, Egypt, European Union (EU), India, Peru, Sierra Leone and  
United Arab Emirates (UAE)

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/47-PR<sup>1</sup> 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.

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<sup>1</sup> <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>

**ANNEX****GENERAL AND SPECIFIC COMMENTS**

COMMENT	MEMBER/OBSERVER
<p>Canada offers the following comments to each of the recommendations:</p> <p><b>(i) Whether the general approach to the development of the database for the national registration of whether pesticides is appropriate – please indicate any further improvements that can be incorporated to facilitate data collection and analysis.</b></p> <p>Canada agrees with the general approach and format of the database and wishes to re-iterate that the links to the list of appendices, where the revised Codex Classification of Food and Feed (CXA 4-1989) were found, as well as the clarity provided in the instructions were very helpful in populating the spreadsheet. As such, Canada has no further improvements to suggest that would facilitate data collection and analysis.</p> <p><b>(ii) Whether sufficient responses are available to support the periodic review of unsupported compounds with no public health concern which are no longer be supported by the manufacturer.</b></p> <p>Canada notes that the overall number of responding countries is low, understanding that this exercise is very resource-intensive. Canada would like to suggest that member countries, who have not populated the database, be provided one last opportunity to express their interest to do so at this year's CCPR. If no commitment is made, Canada recommends that the EWG proceed with next steps.</p> <p>That said, the lack of responses should not preclude the EWG from pursuing next steps for compounds for which a significant number (&gt;20 countries) of responses were received.</p> <p><b>(iii) Whether a smaller number of substances can be foreseen for the next years exercise on the database for the national registration of pesticides.</b></p> <p>Canada would like to recommend that, in the future, a smaller number of pesticides be selected (15), in light of the resources required to complete this exercise.</p> <p><b>(iv) Whether the results of this exercise should be submitted to the EWG on unsupported compounds without public health concerns to decide on whether it would be useful (a) to consider an active substance from Group 1 or 2 for their future work and (b) to start discussions on those substances from Group 3 where no support is given so far.</b></p> <p>Canada agrees with submitting the results of the exercise to the EWG on unsupported compounds without public health concerns to initiate the discussion and establish the process.</p>	<p><b>Canada</b></p>
<p><b>(i) Si el enfoque general para el desarrollo de la base de datos del registro nacional de plaguicidas es apropiado. Indique cualquier mejora adicional que pueda incorporarse para facilitar la recopilación y el análisis de datos.</b></p> <p>La base de datos que se presentó para recopilar información en las dos últimas cartas circulares, presenta una mejora considerable respecto de las versiones anteriores. No obstante, de decidir continuar con esta base de datos, se debería buscar la posibilidad de un ingreso de información en línea en reemplazo de una planilla Excel.</p> <p><b>(ii) Si se dispone de suficientes respuestas para sustentar la revisión periódica de los compuestos sin apoyo que no son motivo de preocupación en materia de salud pública que ya no son apoyados por el fabricante (véanse también los temas 8 y 10 del programa).</b></p> <p>En consideración al procedimiento interno para los compuestos no apoyados e incorporado al CCPR en su 54ª reunión, Chile considera que se debería evaluar la necesidad de continuar completando la base de datos o definir la frecuencia de actualización en base al interés que vayan presentando los Miembros para buscar apoyo de un determinado compuesto.</p>	<p><b>Chile</b></p>

COMMENT	MEMBER/OBSERVER
<p><b>(i) Si el enfoque general para el desarrollo de la base de datos del registro nacional de plaguicidas es apropiado. Indique cualquier mejora adicional que pueda incorporarse para facilitar la recopilación y el análisis de datos.</b></p> <p>Anexar a la base de datos en formato en Excel, una hoja donde se encuentren las categorías de productos básicos, con el fin de facilitar la revisión.</p> <p><b>(ii) Si se dispone de suficientes respuestas para sustentar la revisión periódica de los compuestos sin apoyo que no son motivo de preocupación en materia de salud pública que ya no son apoyados por el fabricante (véanse también los temas 8 y 10 del programa).</b></p> <p>Sí, por la regulación colombiana, la cual busca la actualización del periodo de carencia por metodología de curvas de degradación, lo que a futuro hará que se disminuyan los usos y moléculas registradas.</p> <p><b>(iii) Si puede preverse un menor número de sustancias para la labor de los próximos años sobre la base de datos del registro nacional de plaguicidas.</b></p> <p>Colombia considera que, si bien, no son suficientes las respuestas disponibles en cuanto a la representatividad regional y más aún, cuando, no es posible dilucidar los países que en la región aportaron información. Sin embargo, al validar los resultados si resultan ser representativos para la realidad de registros de plaguicidas en Colombia.</p> <p><b>(iv) Si los resultados de esta labor deben presentarse al GTE sobre compuestos sin apoyo que no son motivo de preocupación en materia de salud pública para decidir si sería útil: a) considerar una sustancia activa del Grupo 1 o Grupo 2 para su trabajo futuro, y b) iniciar los debates sobre las sustancias del Grupo 3 que hasta ahora no han sido apoyadas.</b></p> <p>De acuerdo a la revisión entre las moléculas con mayores registros y mayores usos versus las moléculas registradas en Colombia, sí, consideramos útil presentar al grupo de trabajo las moléculas a priorizar en los grupos 1 y 2; a la vez, que se considera viable la propuesta de iniciar debates sobre las sustancias del grupo 3.</p>	Colombia
<p>Egypt appreciates the work which done in the document and agrees on the recommendations on how to progress work on the database for national registrations of pesticides to aid periodic reviews of compounds by the Joint FAO/WHO Meeting on Pesticide Residues (CCPR)</p> <p><b>(i) Whether the general approach to the development of the database for the national registration of whether pesticides is appropriate – please indicate any further improvements that can be incorporated to facilitate data collection and analysis.</b></p> <p>The general approach to the development of the database for the national registration of pesticides is appropriate</p> <p><b>(ii) Whether sufficient responses are available to support the periodic review of unsupported compounds with no public health concern which are no longer be supported by the manufacturer.</b></p> <p>Yes , there are sufficient responses which support the periodic review of unsupported compounds with no public health concern , if required.</p> <p><b>(iii) Whether a smaller number of substances can be foreseen for the next years exercise on the database for the national registration of pesticides.</b></p> <p>We agree to reduce number of substances for the next years on the database for the national registration of pesticides.</p> <p><b>(iv) Whether the results of this exercise should be submitted to the EWG on unsupported compounds without public health concerns to decide on whether it would be useful (a) to consider an active substance from Group 1 or 2 for their future work and (b) to start discussions on those substances from Group 3 where no support is given so far.</b></p> <p>We agree with the submission of results of this exercise to the EWG on unsupported compounds without public health</p>	Egypt

COMMENT	MEMBER/OBSERVER
<p><b>(i) Whether the general approach to the development of the database for the national registration of whether pesticides is appropriate – please indicate any further improvements that can be incorporated to facilitate data collection and analysis.</b></p> <p>The EUMS support the current and the general approach to the development of the database for the national registration of pesticides.</p> <p><b>(ii) Whether sufficient responses are available to support the periodic review of unsupported compounds with no public health concern which are no longer be supported by the manufacturer.</b></p> <p>The EUMS note, that although the results of the exercise are not representative enough to form a sound basis for the planning of the periodic review of unsupported compounds with no public health concern, a lot of work has been done by the eWG on national registration of pesticides and the results could be used as an indication by the eWG on unsupported compounds without public health concerns.</p> <p>The EUMS note that only 33 and 36, respectively, out of 188 member countries have replied to the Circular Letter CL 2023/25-PR and CL 2023/86-PR. Out of those replies almost half were from the EUMS. Therefore, although all regions of the world are covered, the replies might not be representative enough to form a sound basis for the planning of the periodic review of unsupported compounds with no public health concern. The EUMS encourage more member countries to contribute as a better overview would be indispensable for such planning.</p> <p><b>(iii) Whether a smaller number of substances can be foreseen for the next years exercise on the database for the national registration of pesticides.</b></p> <p>Whether or not a smaller number of substances could help to overcome the low level of participation of member countries, should be further discussed at the CCPR55.</p>	European Union
<p>India holds the view that with food safety standards being stringent and the use of pesticides being rampant and unavoidable and with more people being alert on the perils of pesticide exposure, smaller number of pesticides cannot be foreseen on the database of national significance.</p> <p><u>Rationale:</u> More data need to be provided by member countries w.r.t pesticides not used/ not available in common and greater participation from member countries also required.</p> <p>India believes that more responses by member countries using the specific pesticides would help in getting a better understanding of the unsupported compounds with no public health concern, no longer supported by the manufacturer. These would help to monitor stability, degradation status of the pesticide and the geographical implications of the same, if used.</p> <p><u>Rationale:</u> Data provided by 33 countries (Gr 1&amp;2) and 36 (Gr.3) may not be sufficient. Some pesticides not used in EU countries and may be important during trade outside EU, have to be supported with relevant safety data and safety evaluation studies of the same need to be assessed.</p> <p>If use of certain pesticides for which no safety data is available, can they be alternated with other pesticides which are commonly available. The knowledge of the same can be shared by member countries and the use of multiple pesticides (without safety data esp.) can be minimised globally.</p> <p><u>Rationale:</u> Adequate toxicological evaluation of several pesticides and relevant safety data are not available or are not tabulated in the database.</p> <p>i) Minimum number of GAP trials required for major crops (e.g., cereals, pulses, vegetables, and some fruits) is eight for calculating MRLs using OECD calculator. In many Asian countries, number of GAP trials for pesticide residues are less than eight and therefore there is a need to create an Asian Network to fulfil the requirement to justify the usage of OECD calculation.</p>	India

COMMENT	MEMBER/OBSERVER
<p>ii) For crops grown in limited areas (e.g., spices, tea, herbs, apple etc), monitoring data should be prioritised for fixation of MRLs.</p> <p><u>Rationale:</u></p> <p>i) For small countries, it might not be possible to conduct the required number of trials for OECD calculation.</p> <p>ii) As these crops being grown in limited area, manufacturers are not much interested in supporting the label claim.</p> <p>For some pesticides in the CODEX database, ADI values were decided almost 20 to 30 years back. For the same pesticides, EU and/or Australia have revised ADI values in the recent years. With time because of the advancement in medical toxicology, is it not necessary to adopt the revised ADI values.</p>	
<p>La Comisión NO tiene observaciones o comentarios sobre las recomendaciones para los registros nacionales de plaguicidas a fines de la revisión periódica.</p>	<p><b>Peru</b></p>
<p>Sierra Leone recommends a National Pesticide Stake holder Committee comprising of Institutions representing Industries using pesticides which will work with the national Pesticide Regulatory body for the registration and regulation of pesticides.</p>	<p><b>Sierra Leone</b></p>
<p>United Arab Emirates suggests that Codex coordinates workshops to provide more insight on the requirements of the NRP for members which will have positive impact on the quality of data provided by member countries.</p> <p>United Arab Emirates considers that the National Registration of pesticides (NRP) is an efficient tool that help CCPR to decide about the periodic review of the unsupported compounds. However, the data provided by members should be updated and evaluated by CCPR before being used.</p> <p>In order to achieve a better consensus, United Arab Emirates suggests that the results of this exercise should be submitted to the EWG on unsupported compounds without public health concerns to decide accordingly.</p> <p>Concerning Group 3 for which toxicological evaluation is available before 2000, United Arab Emirates suggests the evaluation of Profenofos which frequently appears in: gourd, okra, strawberry, alfalfa, celery, guava and lemon.</p>	<p><b>United Arab Emirates</b></p>