

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CODEX COMMITTEE ON PESTICIDE RESIDUES

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Comments submitted by Burundi

Burundi appreciates the opportunity to provide comments on the different agenda items to be discussed by the fifty-fifth Session of the Codex Committee on Pesticide Residues.

Agenda Item 1

CX/PR 24/55/1

Adoption of the agenda

Position: Burundi has no proposed changes to recommend on the provisional agenda.

Agenda Item 2

Appointment of rapporteurs

Position : Burundi supports this arrangement.

Agenda Item 3

CX/PR 24/55/2

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

Position: Burundi appreciates and supports the development of the first Draft Codex Strategic Plan 2026-2031.

Rationale: It is a core document that will give direction to the work of Codex Alimentarius Commission and its subsidiary bodies.

Agenda Item 4(a)

CX/PR 24/55/3

Matters arising from FAO and WHO

FAO/WHO Joint Meeting on Pesticide Management (JMPPM)

Position: Burundi supports all the activities which have been highlighted during the 16th annual meeting which took place in Geneva.

Rationale: Burundi 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 pesticides among others. As we embrace technology, unforeseen challenges and this requires update and review of guidelines to address emerging issues.

FAO/WHO Joint Meeting on Pesticide Specifications (JMPS)

Position: Burundi supports 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.

FAO Capacity Development in Risk Assessment and Pesticide Management

Position: Burundi appreciates the FAO for all the capacity development initiatives in the African, Asian and near East Regions. Burundi would like to propose that a similar training on risk assessment and MRL setting be organized for the African region.

Rationale: A number of African countries have benefited from the FAO pesticide registration tool kit training and are currently using the tool kit. The mentioned activities will enhance the participation of countries in Codex and strengthen risk assessment frame work.

Reducing Risks of Highly Hazardous Pesticides

Position: Burundi thanks the FAO and other Partners for undertaking this initiative to mitigate risks associated with highly hazardous pesticides in the world.

WHO activities on Pesticide Residues in Drinking Water, Dioxin and Dioxin-like Compounds, Estimates of the Burden of Foodborne Disease,

Position: Burundi supports the goals and activities presented by WHO. Burundi recognizes their impact on improving human health and agricultural productivity on particularly the African continent. Burundi supports collaborating with WHO to enhance pesticide management, reduce risks associated with hazardous substances, and improve food safety standards. Burundi further 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**

Position: Burundi appreciates the FAO and IAEA for their extensive capacity-building efforts, particularly in enhancing laboratory infrastructure and competencies across the African continent including Burundi. These initiatives are crucial, 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. Burundi encourages the continuation and expansion of such programs to further strengthen African countries capabilities in food safety management.

Agenda Item 5(a)**Section 2 of the 2023 JMPR Report****Report on items of general consideration arising from the 2023 JMPR meeting**

Position: Burundi supports the gradual transition to the GECDE methodology for estimating chronic dietary exposure. Burundi recognizes its potential to provide more accurate assessments reflective of diverse consumption patterns across countries. This support is aligned with efforts to enhance the scientific rigor and relevance of pesticide residue assessments in our contexts, to ensure that global standards are effectively tailored to meet public health and safety requirements. Burundi would also like to propose more capacity building in this area. However, Burundi would like to emphasize that there should be transparency throughout the transition process from the use of the IEDI methodology to GECDE methodology and the issues arising from conservatism of the approach should be well addressed.

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**

Position: Burundi thanks 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. Burundi would like also, 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)**

Position: Burundi thanks the JMPR for undertaking the risk assessment of pesticide/commodity combinations for both toxicological and residue data provided from a number of studies. Burundi supports 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), Burundi would like to propose that these missing data should be provided by the sponsors.

Burundi does not support the proposed MRLs for Broccoli due to the use of iprodione and MRLs for eggplant and mango due to the use of carbosulfan.

Burundi proposes 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: Burundi 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.

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, 8-20months in Netherlands) and 160%(Children≤6 years 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)**

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

African Position: Burundi thanks the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. The current approach is effective but can further be strengthened by supporting member countries to develop national registration databases for pesticide/crop combination.

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: Burundi thanks the chair of the EWG and 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: Burundi thanks the United States and the other EWG co-chairs for leading this work. Burundi supports the approach recommended in the EWG report. Burundi is in agreement with the opinion 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.

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: Burundi thanks the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work. Burundi supports the initiatives of the Joint CCRVDF-CCPR Working Group and agrees with the proposal to convene a Virtual Joint Physical Working Group.

Rationale: 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. Burundi 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: Burundi 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. Burundi 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.