

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

CAC/44 CRD/34
Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-fourth Session

Prepared by the United States of America as Host Country of CCRVDF

CRITICAL REVIEW - PART 2 (CCRVDF25 AND CCPR52)

Coordination of work between CCPR and CCRVDF on issues of common interest

BACKGROUND

The information below is a summary of the ongoing coordination of work between the Codex Committee on Pesticide Residues (CCPR) and the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF), including the recommendations of the Executive Committee (CCEXEC) in the framework of the Critical Review, in relation to how to address issues of common interest to both committees, notably a single definition for edible offal and the harmonization of maximum residue limits (MRLs) of pesticides and veterinary drugs for compounds with dual uses.

Overall Coordination of work between CCPR and CCRVDF

CCEXEC73 (2017) noted that the work of CCRVDF included compounds used as both veterinary drugs and pesticides and encouraged closer collaboration between CCRVDF and CCPR when considering MRLs for compounds used as both veterinary drugs and pesticides. CCEXEC73 invited the two Committees to explore innovative ways to foster such collaboration.¹

CCEXEC77 (2019) called upon CCPR and CCRVDF to collaborate and synchronize work on issues of common interest to both committees to the extent possible to facilitate the establishment of MRLs for pesticides/veterinary drugs for compounds with dual uses.²

In performing the regular review of Codex Work Management 2018-2019 (*Critical Review Process*), CCEXEC78 (2020) noted that cross-committee cooperation including joint EWGs was important and should be encouraged and taken into account in future work planning.³

Work carried out collaboratively between CCPR and CCRVDF:

Harmonization of definitions (edible offal) and

Establishment of harmonized MRLs for compounds with dual uses

CCPR50 (2018) considered the request from CCEXEC73 on closer collaboration between CCPR and CCRVDF and noted delegations' support on the need to evolve innovative ways for better collaboration between risk assessors (JMPR/JECFA) and risk managers (CCPR/CCRVDF) for optimal evaluation of dual use compounds. CCPR50 further agreed that pesticide compounds having an animal product MRL related only to external animal use should be forwarded to JECFA for evaluation and consideration by CCRVDF whereas the existing MRLs for such compounds would remain available on the Codex Database for MRLs for Pesticide Residues until the establishment of MRLs as veterinary drugs by CCRVDF.⁴

CCRVDF24 (2018) noted the recommendation of CCEXEC73, and the discussion held and policy decision made at CCPR50 in relation to MRLs for pesticides with only external animal use. CCRVDF24 further agreed that, in the framework of collaboration between CCPR and CCRVDF, an Electronic Working Group (EWG) be established to coordinate with the CCPR EWG to elaborate a definition for edible offal and for any other edible

¹ REP17/EXEC2, paras. 17-19.

² REP19/EXEC2, para 19-20

³ REP20/EXEC1, paras. 46 and 51

⁴ REP18/PR, paras. 9 and 152

animal tissues of relevance for the purpose of harmonization and elaboration of single MRLs for compounds with dual uses.⁵

⁵ REP18/RVDF, paras 7-9, 85-95

CCEXEC75 (2018) recommended that the CCPR/EWG on the revision of the *Classification of Food and Feed* (CXA 4-1989), in addition to its existing terms of reference (ToRs), work closely with the CCRVDF/EWG on the definition of edible animal tissues (including edible offal) to develop a harmonized definition that would facilitate the establishment of MRLs for pesticides and veterinary drugs. CCEXEC75 further recommended that the CCRVDF/EWG on the definition of animal tissues, including edible offal, work closely with the CCPR/EWG on the revision of the *Classification of Food and Feed* to develop a harmonized definition that would facilitate the establishment of MRLs for pesticides and veterinary drugs.⁶

CCPR51 (2019) considered a joint report submitted by the Chairs of the CCPR/EWG (Classification) and the CCRVDF/EWG (Edible Offal) which addressed a number of questions related to common definitions, harmonization of terminology and food descriptors as well as the possibility of a consolidated edible offal hierarchical classification that could be used for CCPR and CCRVDF for the establishment of harmonized MRLs for food of animal origin, amongst others. The outcomes of the discussion in CCPR51 allowed the further revision of the paper which was later submitted to CCRVDF25 for consideration.⁷

CCRVDF25 (2021) considered the recommendations of the CCRVDF/EWG (Edible Offal) and recommended a definition for edible offal based on a proposal discussed at CCPR51 which is being considered for final adoption by CAC44 and inclusion in the *Glossary of Terms and Definitions - Residues of Veterinary Drugs in Foods* (CXA 5-1993) In taking this decision, CCRVDF25 recommended CCPR to adopt the same definition for consistency and facilitation of establishment of harmonized MRLs for compounds with dual purposes and re-established the EWG to continue working in parallel with the CCPR/EWG-Classification on issues pertaining to harmonization of edible offal notably the possibility to develop a mechanism for consolidation of an edible offal hierarchical classification in the *Classification of Food and Feed* (CXA 4-1989) and harmonization of / appropriate food descriptors when setting MRLs for food of animal origin and to advice to JMPR and JECFA accordingly.⁸

In addition, CCRVDF25 hold a more broader discussion on coordination of work between CCPR/CCRVDF and JMPR/JECFA to set single/harmonized MRLs for the tissue/food for compounds with dual uses and the ongoing lack of harmonization on setting MRLs for compounds with dual purpose which sometimes led to different health reference values being proposed by JECFA and JMPR, respectively, with resultant different MRLs for the same tissue/food. The Codex Secretariat explained that currently there were no established procedures or mechanisms in Codex to allow CCPR and CCRVDF to work jointly to establish single/harmonized MRLs for compounds with dual uses and that it might be necessary to request advice from CCEXEC on how CCPR and CCRVDF could work together to address this issue. CCRVDF25 thus agreed to request CCEXEC advice on a mechanism for cooperation between CCPR and CCRVDF on establishment of harmonized MRLs for dual use compounds. This request was subsequently supported by CCPR52 (2021).⁹

CCPR52 (2021) further considered issues related to cooperation of work between CCPR and CCRVDF and agreed, that, in addition to start the revision of the Classification for primary and processed food commodities of animal origin, and in view of insufficient time to consider the issue of the harmonization of meat mammalian MRLs between CCPR and CCRVDF and the definition of edible offal, that work in parallel with the CCRVDF/EWG-Edible Offal would continue to facilitate the harmonization of terminology/definitions that could facilitate the establishment of MRLs for compounds with dual uses for food of animal origin.¹⁰

CCEXEC81 (2021) considered this request in the framework of coordination of work between CCRVDF and CCPR and recalled that CCRVDF25 has sought CCEXEC advice on a mechanism for cooperation between both committees on the establishment of harmonized MRLs setting for compounds with dual use which was supported by CCPR that also encouraged innovative ways of working to facilitate and promote cooperation on cross-sectoral issues between CCRVDF and CCPR as needed and to the extent possible and that this was also relevant within the framework of the cooperation on edible offal. CCEXEC81 recommended that CCRVDF and CCPR makes use of joint EWGs, including the use of virtual technology, to further advance the work on cross-sectoral issues between CCRVDF and CCPR.

ANALYSIS

There has been a recognition at executive level of Codex for the need for cooperation between CCPR and CCRVDF on issues of common interest for both committees to facilitate the establishment of harmonized MRLs

⁶ REP18/EXEC2-Rev.1, paras. 27-28

⁷ REP19/PR, paras. 157-177, 179

⁸ REP21/RVDF, paras. 106 – 116

⁹ REP21/RVDF, paras. 140-146

¹⁰ REP21/PR, paras. 12, 179, 180-185

for compounds with dual uses (i.e. as pesticide and veterinary drug) for public health and international trade, and also to facilitate their uptake and enforcement by Codex member countries.

CCPR and CCRVDF have taken action within the current available procedures to improve communication through standing common agenda items such as referring matters of concern through the Codex Secretariat or through the identification of specific issues of concern such as harmonization of the definition of edible offal and the establishment of parallel EWGs sharing the mandate of work together on issues pertaining to harmonization of terminology and definitions, including a possible harmonization of the *Classification of Food and Feed*, that could support the establishment of MRLs for pesticides and veterinary drugs for food of animal origin. Although such mechanisms remain a valid option and the outcomes have been so far positive to a great extent, the shortcomings are the operation under different timeframes and time intervals in both committees that may lead to delays in the joint resolution of such issues for adoption or consideration by CAC.

Following discussion in CCEXEC81 on how Codex could enhance resilience and adapt to work post-COVID19 pandemic, there is a momentum to contribute to the blueprint that will follow this discussion in CCEXEC which could contribute to how Codex could operate in a more effective, and when needed, coordinated way, with other relevant subsidiary bodies of CAC such as the case of CCPR and CCRVDF. There has been also a recognition of the more prominent role that EWGs could play in the development of technical and concept documents in order to facilitate discussion and consensus-building in plenary sessions and so to contribute to more focused and fruitful discussions in plenary.¹¹

In view of the above, there is a need for a more overarching, high level discussion on how CCPR and CCRVDF could cooperate or work together more efficiently on matters of common interest to both committees that could provide guidance to facilitate future work on such areas in a timely and joint manner that would overcome the shortcomings of parallel work and different timing/calendar of both committees and possible inconsistent outcomes. A joint CCPR/CCRVDF EWG could be a starting point to addressing the aforementioned points.

The establishment of such a joint CCPR/CCRVDF EWG would not impact on the mandate of any of the parallel EWGs that have already been established by CCPR52 and CCRVDF25 but would rather perform a review or horizon scanning of the issues related to cooperation between these two committees, what remains for cooperation or work in each committee within each of their mandates, what is feasible to do by applying innovative approaches and/or using the current set up, how to improve communication between risk assessors (JMPR/JECFA) and risk managers (CCPR/CCRVDF) to facilitate harmonized approaches for issues such as dual compounds/establishment of single MRLs. The Joint EWG could also work as a pilot on how joint EWGs could operate and identify good practices that ensure transparency and inclusiveness of the process that could apply to the functioning of joint EWGs, not limited to CCPR and CCRVDF in future. This joint EWG can present conclusions/recommendations, if possible, or simply prepare a progress report to CCPR53 meeting late in the first half of 2022 and CCRVDF25 meeting in early 2023.

CONCLUSION

Based on the recommendations of CCEXEC on cooperation of work between CCPR and CCRVDF, and the ongoing efforts in both committees to work in parallel on issues identified of common interest, it would be advisable to establish a Joint CCPR/CCRVDF EWG that could address such issues in a comprehensive, wide-ranging, all-encompassing way and make recommendations about what such areas could be, criteria for prioritization of areas of cooperation and possible mechanisms available for their timely and joint/coordinated consideration in both committees.

RECOMMENDATION

CAC 44 to establish a Joint CCPR/CCRVDF on issues of common interest to both Committees with the overarching, flexible mandate as follows:

This EWG will review work already done cooperatively CCRVDF and CCPR so far and will identify, and if possible, prioritize areas of possible [further] collaboration between CCRVDF and CCPR and how this could be carried out (e.g. jointly, in parallel, etc.) that could facilitate the consideration of compounds with dual uses by both committees and the possible establishment of harmonized MRLs for food of animal origin to ensure public health protection and trade facilitation.

This may include reflections on improved collaboration between JMPR/JECFA, improved synchronization of work between CCPR and CCRVDF e.g. through the EWG on Priorities, joint agendas, joint or back to back meetings, etc. As such, the mandate remains flexible for the Joint EWG to explore these issues and provide

¹¹ REP21/EXEC2

an overview of what it is possible to do through collaborative work (and if [possible] in which way(s)) and what should remain within the areas of expertise of both committees.

The Joint EWG should also liaise/work in close collaboration with the JECFA and JMPR Secretariats to delimit the areas for risk assessment and risk management for coordination of work, the latter being of direct interest for collaborative work between CCPR and CCRVDF and with the Codex Secretariat procedural options to enhance collaboration on this area.

The Joint EWG will not replace the ongoing [parallel] cooperation between the established EWGs under CCRVDF (edible offal) and CCPR (revision of the Classification) within their respective mandates

The Joint EWG will report on their findings to CCPR53 and CCRVDF26 respectively.