



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

52nd Session

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Comments submitted by Morocco

Agenda Item 6

Morocco supports the advancement of almost all new MRL projects. However, we express our reservation on the following MRLs:

Bifenthrin (178):

MRL: 3 mg / kg for strawberries (code: FB 0275)

Justification: Public health risk, Acute toxicity

The JMPR concluded that the estimated acute dietary exposure to bifenthrin residues from the consumption of strawberries may present a public health concern.

Clethodim (187):

Morocco requests that the CXL = 0.1 mg / kg for sugar beet (code VR 0596) be maintained for a period not exceeding four years if a sponsor commits to provide new data to the JMPR.

Picoxystrobin (258):

MRL: 15 mg / kg for green, black tea (black, fermented and dried) (code: DT 1114).

Justification: Public health risk, Possible genotoxic potential of metabolites.

Tolfenpyrad (269):

MRL: 0.7 mg / kg for the tomatos, subgroup (Code VO 2045).

MRL: 0.7 mg / kg for the eggplants, subgroup (Code VO 2046).

Justification: Public health risk, Acute toxicity

The JMPR concluded that the estimated acute dietary exposure to residues of Tolfenpyrad for consumption of tomatoes and eggplants may present a public health concern.

Pyflubumid (314):

MRL: 1 mg / kg for apple (code: FP 0226)

MRL: 80 mg / kg for green, black tea (black, fermented and dried) (code: DT 1114).

Justification: Public health risk, Acute toxicity

The JMPR concluded that the estimated acute dietary exposure to residues of Pyflubumid for consumption of apple and tea may present a public health concern.

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Morocco supports the advancement of this directive for the international harmonization of low-risk compounds to be exempted from MRLs such as basic substances or those used in food chains, pheromones, microorganisms not pathogenic to mammals, etc.).

However, Morocco suggests a negative list of allergenic substances (of concern to vulnerable populations) to be excluded from the scope of this directive.

Morocco notes that the exemption of low risk compounds from MRLs would encourage the use of these compounds in crop protection and for preservation of plants products, and would further facilitate international trade of food commodities.

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Morocco supports option 3 since it meets the principle of the Codex Alimentarius: Members are granted 4 years to fulfill the data requirements to maintain the CXLs and if Members are unable to address the data requirements, all CXLs are to be withdrawn.

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Morocco approves the program of pesticides to be evaluated as a priority for JMPR 2021, and notes that the periodic evaluation (Toxicology and residues) for Dimethoate is desirable.