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World Health Organization

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CODEX COMMITTEE ON PESTICIDE RESIDUES

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ENHANCEMENT OF THE OPERATIONAL PROCEDURES OF CCPR AND JMPR: Opportunities, Challenges, and Recommendations on Next Steps

(Prepared by the Electronic Working Group chaired by the United States of America and co-chaired by Costa Rica, France, Germany, and Uganda)

Codex members and observers wishing to submit comments on the recommendations in paragraph 20 should do so as instructed in CL 2023/39-PR available on the Codex webpage[1]

I. OVERVIEW

1. The 53rd Session of the Codex Committee on Pesticide Residues (CCPR53, 2022) established an Electronic Working Group (EWG) to collect information on the need to enhance the operational procedures of CCPR and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) and the associated opportunities and challenges.[2] The EWG's terms of reference were to:

   i. *Prepare a circular letter (CL) to request information from members and observers on the need to enhance CCPR/JMPR and the associated opportunities and challenges. In addition, the CL may invite members and observers to consider a second or possibly subsequent workshops that would expand on and further develop some of the themes addressed in the virtual workshop sponsored by CropLife International on March 31, 2022, as described in CX/PR 22/53/20.*

   ii. *On the basis of the responses to the CL, prepare a summary of the submitted information and a discussion paper that summarizes findings for consideration at CCPR54 and later transmission to JMPR.*

   iii. *Coordinate work with related EWGs such as the EWGs on priority lists, national registration database, unsupported compounds.*

2. Based on these terms of reference, the EWG prepared CL 2022/75-PR to request comment from Codex Members and observer organizations.[3] Comments submitted in response to this CL have been compiled in this discussion paper and are intended to guide CCPR and JMPR on future deliberations on how to improve the existing Codex system to meet current and future demand for JMPR evaluations. This discussion paper first provides background on EWG, then summarizes submitted comments, and finally makes recommendations for considerations by the 54th Session of CCPR. A compilation of all submitted comments is also provided in *Appendix I* of this discussion paper.

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1 Codex webpage/Circular Letters: http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/.
Codex webpage/CCCF/Circular Letters: https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/tr/?committee=CCPR

2 2022, Report of the 53rd Session of CCPR, Paragraphs 253-259 (REP22/PR53, 253-259). Available at: https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-53%252FREPORT%252FFINAL%252520REPORT%252FREP22_PR53e.pdf.

3 https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FCircular%252520Letters%252FCL%2525202022-75%2528Rev1%2529%252Fcl22_75e.pdf

II. BACKGROUND

3. At CCPR53 (2022), concerns were raised that the current CCPR/JMPR system is unable to keep up with global demand for the evaluation of new compounds, uses, and periodic reviews. While the most recent deliberation at CCPR53 was prompted by the cancellation of JMPR meetings following the Covid 19 pandemic, the growing demands on JMPR and its implications have been an important topic of discussion at several previous sessions of CCPR.[4]

4. Most notably, FAO/WHO commissioned a 2002 review of the working procedures of JMPR[5] that was reviewed at CCPR34 and the JMPR 2002 Regular Meeting. Key findings from the 2002 FAO/WHO report are summarized below and remain relevant today:

> *"Whereas in the 1960s the JMPR monographs, which summarise the scientific data following a critical evaluation, were extremely brief in accordance with the standards of the time, the modern monographs are very detailed and extend to over one thousand pages for a particular Meeting."*
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> *"There has been a huge increase in the quantity of scientific data submitted for evaluation, and yet the JMPR only exists for two weeks of the year, in contrast to the situation at a national regulatory authority level."*
>
> *"Financial resources available for this work have not increased proportionally leading to the generation of a backlog of pesticides waiting for review."*
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> *"The current JMPR system is also very vulnerable in that it relies on the goodwill of a limited number of individuals who work on a voluntary basis. These individuals, despite being internationally recognised in their fields, have to prepare the monographs without any financial reward and usually in their own personal time."*
>
> *"Typically, the Temporary Advisers of the WHO Core Assessment Group and Members of the FAO Panel have to spend the equivalent of 2-4 months full-time prior to the meeting preparing the monographs. The availability of suitable experts that are prepared to work on this basis is very limited."*

5. In its review of the 2002 FAO/WHO report, CCPR34 confirmed that "JMPR was essential to the continued independent international evaluation of pesticide residues" but raised similar concerns that the increased demands on JMPR has resulted in a process that "had become unsustainable and without additional resources the system would fail sooner, rather than later."[6] JMPR re-iterated these concerns at its 2002 regular meeting, but also cautioned that making changes to the operational procedures of JMPR "requires considerable resources and the implementation could become counter-productive if it is no more than the introduction of one suggested change after another without an overall strategic direction."[7] JMPR-2002 then concluded by recommending that FAO, WHO, and the Codex Alimentarius Commission prepare a strategic plan that can serve as a framework for future changes.

6. There have been continued discussions on the increased demands on JMPR since FAO/WHO's 2002 report was published, but a strategic plan was never developed to guide future changes to JMPR. Therefore, CCPR is now revisiting whether there is a need to enhance the operational procedures of CCPR and JMPR and what associated opportunities and challenges may arise from these changes. This information will be used by CCPR and JMPR to further explore how to improve the existing system to meet current and future demand for JMPR evaluations.

III. SUMMARY OF COMMENTS

7. This section provides a summary of the responses to CL 2022/75-PR and is organized based on five CL charge questions that requested information on:

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4 REP22/PR53, paras. 253-259

5 2002, Report on the Review of the Working Procedures of JMPR. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf.

6 2002, Report of the 34th Session of CCPR, Review of the Working Procedures of JMPR, Paragraphs 181-200. Available at: https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-34%252FAl03_24e.pdf.

7 2002, JMPR Report, General Considerations, Section 2.1: Needs of JMPR. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/Reports_1991-2006/Report_2002.pdf.

1. The need to enhance the operational procedures of CCPR/JMPR,
2. Opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes,
3. Anticipated challenges in implementing proposed enhancements and major reform;
4. Recommendations on key topics and themes for potential stakeholder workshop; and
5. Any addition proposals and recommendations that are relevant to CCPR's discussion of enhancements to CCPR/JMPR.

8. A total of fifteen Member Countries and three Observer Organizations submitted information in response to CL 2022/75-PR. The summary of responses highlights both areas of consensus and divergent opinions on enhancements to the operational procedures of CCPR/JMPR. The summary of responses also provides specific recommendations on opportunities and associated challenges and is organized into common themes. A complete compilation of comments is also provided in *Appendix I* of this discussion paper.

Charge Question 1:

Please comment on the need to enhance the operational procedures of CCPR/JMPR to (i) eliminate the backlog of compounds evaluations caused by the cancelation of JMPR meetings due to the COVID19 pandemic and (ii) expand its review capacity to meet the future demand. If possible, please organize your response using the suggested categories below.

- *Current workload of new compounds, uses, and periodic evaluations*
- *Future workload demand for new compounds, uses, and periodic evaluations*
- *Other reasons to enhance the operational procedures of CCPR/JMPR*

9. There was general consensus that there is a need to enhance the operational procedures of CCPR and JMPR to address concerns related to both JMPR current workload and future demand for compounds evaluations. Commenters emphasized that JMPR is essential for the independent international evaluation of pesticide residues but raised concerns about the growing workload due to disruptions from the Covid 19 pandemic, increasing complexity of assessments, and growing number of existing compounds that qualify for periodic review. It was also highlighted that the growing workload and complexity of evaluations was identified as an issue by JMPR in 2002 and the "voluntary contributions by individuals of their own time, is not sustainable with the increasing workloads and the complexity of modern evaluations." This commenter further noted that the complexity of evaluations and JMPR's workload has only increased since this 2002 JMPR report. Several other commenters also indicated that capacity issues have been discussed by CCPR for more than two decades and that many improvements identified in 2002 JMPR Report remain unresolved.[8]

10. Several commenters cautioned that increasing JMPR's capacity will require more than recruiting additional experts because JMPR must evaluate a range of complex issues, make scientifically sound judgments, and has limited time during its annual meetings. As an example, one commenter highlighted that a typical JMPR meeting consists of 12 - 15 full compound assessments and 15 - 20 new uses assessments, resulting in less than one day per compounds on all scientific issues. As such, the commenter suggested that it may be challenging to increase the output of JMPR without changing the rigor and independence of its evaluations. Other commenters raised similar concerns and suggested that while it may be possible to increase the number of experts, it may not be feasible to extend JMPR's regular meetings beyond its current period (i.e., 9 working days) to review additional compounds. For example, concerns were raised that efforts to increase JMPR's review capacity will also require increased, sustainable funding from various national authorities. It may be challenging for national authorities to commit to providing increased financial support to JMPR/CCPR in light of all other national priorities.

11. Beyond the broader questions of whether there is a need to enhance the operational procedures of CCPR/JMPR, there were range of suggestions related to the management of JMPR's workload and more clearly defining the time and resource requirements to conduct evaluations based on the experience of JMPR's experts. Specific suggestions included:

- Request that the FAO/WHO Secretariats conduct a survey (e.g., by requesting JMPR experts' experience) on:

8 2002, Report on the Review of the Working Procedures of JMPR. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf.

- the usual time required during meetings for the evaluation of a new compound and for evaluation of a substance under the periodic review program (assuming all relevant preparations have been completed before the meeting, such as preparing close to final, internally peer-reviewed evaluations and appraisal documents),
- the usual time required during meetings for new MRL assessments and
- the usual time required during meetings for general issues like responses to CCPR or General Items.

Based on this information, the workload and prioritization of the meeting agenda could be aligned with the available timeframe and required additional resources could be quantified and appropriate measures taken on that basis.

- CCPR/JMPR may want to focus on more clearly communicating the impact of the cancelation of physical meetings on the schedule of reviews for JMPR and develop a public workplan that provides a status update on reviews that have been initiated by JMPR, whether they will be delayed, and indication of a target completion year by JMPR. Similarly, another commenter suggested that JMPR develop an electronic platform/portal that provides summary information on its workload and a database of experts that cover all areas of the JMPR work.
- A more stringent approach should be adopted for existing compounds with CXLs that are no longer supported by a manufacturer. The 4-year rule already exists for unsupported substances and the 25-year rule is laid down in the Codex procedural manual, but it is not implemented in CCPR in a strict way. Notably, the procedural manual clearly states that "the proposed MRL is maintained for a period of no more than four years" and that when "there is no commitment to provide additional information, or no data are supplied despite a commitment being made in relation to the four-year-rule, the CCPR considers withdrawal of the draft MRL ." A clear decision should be taken by CCPR to withdraw such substances. Consequent withdrawal of the corresponding CXLs will contribute to reducing the number of substances for which a periodic review is overdue.
- The number of active substances with the reference "Awaiting advice on supported commodities" increases from year to year. As such, data submitters need to meet their commitments in a timely and comprehensive manner. Here too, a more stringent use of the rules laid down in the Procedural Manual would be necessary.

Charge Question 2 and 3

Please comment on opportunities to enhance the operational procedures of CCPR/JMPR to improve the efficiency of the evaluation process and increase JMPR's evaluation capacity. Please consider both opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes) in your comments. If possible, please organize your response using the suggested categories below.

- *Opportunities for Enhancement*
  - *Data Sponsor Dossier and Electronic Data Submission*
  - *CCPR Processes and Procedures*
  - *JMPR Evaluation Process and Procedures*
  - *JMPR Organizational Structure, Staffing and Resources*
  - *Other Areas of Enhancement*
- *Opportunities for Major Reform*
  - *Use of National Reviews and Data*
  - *Alternative Peer Review Models*
  - *Other Areas of Reform*

For the opportunities you have identified, please comment on the anticipated challenges and propose possible solutions that may be implemented by CCPR and JMPR. This may include challenges related to resources, process and procedures, and governance.

12. Responses to Charge Questions 2 and 3 are excerpted in *Table 1* and *Table 2* below which provide information on opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes), respectively. The summary information presented in the tables was excerpted directly from submitted comments and organized based on common themes.

Table 1: Summary of Comments on Opportunities for Enhancement to CCPR/JMPR and Associated Challenges.

Theme	Excerpted Comments on Challenges and Opportunities
Data Sponsor Dossier and Electronic Data Submission	
Data Standardization, Digital Templates, and Information Technology (IT)	– JMPR has developed extensive guidance documents on the preparation of dossiers and supporting data for evaluation by the FAO and WHO panels of JMPR. While the guidance documents outline requirements related to data formatting and organization of pesticide residue and toxicological information, there may be further opportunity to standardize the submission of data files that are submitted to JMPR for evaluation. For example, are there data submission software tools and data reporting standards that can be used to harmonize data across different sponsors? Harmonization of data submission across sponsors could potentially improve the efficiency of the evaluation process because JMPR reviewers could evaluate supporting data in a single format when performing analysis and summarizing relevant information. – A potential area of interest that could be explored further is whether a standardized submission format could be developed for field residue trial data. Other areas of interest could be identified by JMPR and discussed with sponsors to determine the feasibility of developing tools to further standardize the reporting and submission of data.
	– Data sponsors have made progress to provide quality dossiers. Data sponsors seek yearly feedback on how they can further improve the dossiers to facilitate the work for the experts at JMPR. Periodic workshops to develop and implement improved digital templates and tools will be welcomed going forward. – Furthermore, IT tools need to be modernized to accept full dossiers as electronic submissions and study data in structured form. For example, FAO requested in its manual for the submission of residue data from 2016 the submission of residue data on spreadsheets. – Several templates have been developed and presented by Sponsors, but to date there is no agreed solution. As a major step forward FAO/WHO should establish relational databases with interfaces for upload of (structured) information provided by sponsors; utilizing electronic submissions by adopting OECD recommended formatting and naming conventions for study reports would also add efficiencies to the process.
	– As a first step it is suggested to explore and map all the possible non costly ways to enhance the operational procedures like improving templates and forms to enable expedited reviews and evaluation reports. The feedback could be also collected from the JMPR experts and industry to see which parts can be improved. It is also important for industry to be more proactive and send complete data packages in order to ensure that assessments are carried out without delay. For periodic reviews, the industry already knows the schedule many years in advance and can commit themselves to prepare the data packages well in advance.
	– There is need to develop a quality criterion to be used by the Data Sponsor Dossier and Electronic Data Submission to enhance credibility and verifiability of the JMPR global monographs. In addition, the sponsors should provide sufficient and current data within a specified time frame for efficient evaluation of pesticides to completion.
	– There is an opportunity to use electronic database as a tool for evaluation or screening process. For example, data sponsor dossier and electronic data submission, the national registration database to consider the re-evaluation of pesticides, particularly those unsupported compounds without public health concern, can be digitalized.
	– Data submitters should ensure to submit the same data as that submitted to all national authorities. – Data submitters are strongly encouraged to use a similar format to that which is in the JMPR Evaluations to generate the dossiers, especially the residue tables, as experts spend a considerable amount of time reformatting the dossier to meet the JMPR formatting requirements.

Theme	Excerpted Comments on Challenges and Opportunities
Timely Data Submission	– It is considered that if data submissions could be made available to JMPR reviewers in a timely and consistent format which reduces the need for data entry, clearly identifies all food and feed metabolites and addresses all data requirements, then this should increase JMPR's efficiency. Ensuring that data submissions clearly address identified issues, and the avoidance of submissions which do not provide for the updating of relevant end points would assist in focusing work and avoid committing evaluator time without a concrete outcome from the JMPR process. The submission of incomplete data packages for new compounds and periodic re-evaluations can result in a significant waste of time and resources. Contemporary templates or electronic formats which ensure the onus on the sponsor to provide "user friendly" dossiers could provide substantial productivity improvements. Additional training through workshops on JMPR requirements for data packages could also be helpful.
Current Data Submission Issues	– When crop field trial data do not reflect the critical GAP, FAO experts spend a considerable amount of time trying to be flexible, attempting to "fit" the data to the critical GAP. – In recent years, metabolites were not consistently named in the WHO and FAO dossiers, making it very difficult to cross-link the metabolites, and ensure the appropriate and correct ones are considered in the residue definition. – Additional scientific and robust data on the toxicology of major plant and animal metabolites would assist in refining the residue definitions for risk assessment and limit the frequency of conducting metabolite-specific risk assessments based on Cramer Classes, which are very time consuming.
CCPR Processes and Procedures	
Development of Efficient Dossiers	– There are opportunities for improvement particularly for the resource intensive and data rich dossiers for periodic reviews of Codex MRLs. As a matter of fact, the number of substances that are scheduled for periodic reviews is building up. Since the resources of JMPR are limited, the list of periodic review substances are leading to a growing list of 'reserve compounds' for new substances. That is an unsatisfactory development from a sponsor's point of view. Sponsors need to prioritize the preparation of dossiers which were postponed. For the next JMPR, the dossier for a rescheduled periodic review needs to be updated with new information that has become available, to avoid inconsistencies between data submitted to JMPR and national authorities. Where new data become available, a clear procedure for submission is needed from CCPR to add these data, due to the fact that they no longer show-up on the schedule.
Schedule and Priority List	– To reduce the number of new uses for the same compound being reviewed at different JMPR Meetings, sponsors should consider maximizing the number of uses requested within one petition.
Coordination on Risk Management Issues	– JMPR should clearly describe the principles followed in its scientific risk assessments and ensure that issues that relate to risk assessment policy are referred to the CCPR. The CCPR reports shall explicitly state such policies in sufficient detail to ensure that the national governments and JMPR can apply them in their evaluations.This shall promote effective communication on risk assessment processes and procedures between CCPR and JMPR.
Criteria for Periodic Reviews	– An approach to enhance CCPR process is to extend the duration of periodic review specified in the Codex Procedural Manual, especially for the non-toxic pesticide of which the national registration exists. If GAPs for pesticide uses remain unchanged, CXLs are able to be retained.
	– Determine if it is possible to extend out the period for period evaluations such as 20 years. This will reduce the number of periodic evaluations over time
CCPR Plenary Discussion on MRLs and Appropriate	– The CCPR processes and procedures are relatively efficient, especially considering the scheduling of pre-meetings for various eWGs, ahead of the plenary, where several concerns raised by member countries are resolved, allowing a more focused discussion during the plenary.

Theme	Excerpted Comments on Challenges and Opportunities
Scope of Interventions	– In recent years, the MRL discussions have taken up significantly less time during plenary. However, the delays in reaching a consensus on some compounds appear to be due to the interventions from non-members (observer status) raising concerns that are not always scientifically-based and validated. While the CCPR Chair and secretariat have been very respectful and diplomatic in addressing these interventions, CCPR is encouraged to explore opportunities to limit such interventions from observers, used predominantly to show case their organization.
Timely Maintenance of the Codex Pesticide MRL Database	– Extra resources could be put towards updating the pesticide MRL database in a timely manner following adoption by Codex. Countries rely on this database as the source of truth for CXLs, so maintaining its currency should facilitate trade.
	– In addition, the Codex secretariat is asked to update the online CODEX MRL database shortly after the CAC meeting, ideally within 90 days, to reflect the most recent decisions and allow for practical search for CXLs by food value chain partners and competent authorities.
CCPR Support for Extra Meetings	– CCPR is responsible for establishing the schedule and priority list for JMPR and has more limited ability to improve the efficiency of the evaluation process and increase JMPR's evaluation capacity. In the past, CCPR has also helped support extraordinary meetings of JMPR and 2019 and 2021. Extraordinary meetings can help increase the review capacity of JMPR in short-term instances; however, increasing the frequency of meetings also places additional burden on JMPR evaluators and will not increase JMPR's overall capacity if there is not an increase in the number of trained JMPR experts who are available to participate.
JMPR Evaluation Process and Procedures	
Required Scope and Level of Detail in Data Sponsor Dossiers and JMPR Monographs	– Does JMPR undertake a pre-assessment of the Data Sponsor Dossier before assessment is undertaken. If not, then this could be an opportunity to filter out incomplete dossiers before they enter the assessment process. They then go to the back of the queue. Depending on the process, there could be backup submissions to replace those submissions rejected at the pre-assessment. – Where additional uses are made for existing compounds, when the compound is due for a periodic evaluations, what is JMPR position on assessment of such data eg less than 5 years from when the periodic evaluation commences. – JMPR monographs need to be transparent and sufficient for a third party to determine how JMPR reached its conclusions and recommendations. The key challenge is how much is too much and how little is too little. – Therefore, is the balance between these two correct for current monographs? Should it be considered they are 'over engineered' then they could be reduced saving time for assessors and allowing them to assess more submissions.
Working Procedures	– The main bottle neck are the capacity and limited number of experts rather than the processes and procedures within JMPR. CCPR should consider the following concrete proposals: a. JMPR should continue to work face-to-face complemented by virtual meetings. b. Provide the opportunity for pre-submission meetings between the data sponsors and the expert evaluators. c. There should be an opportunity for the data sponsor to respond to concerns during the JMPR. This could reduce the number of MRLs that cannot be set because of "missing" data, or misalignment between tox and environment evaluations.

Theme	Excerpted Comments on Challenges and Opportunities
	– Regarding scientific procedures, where data requirements change, following discussions in JMPR or other expert consultations, FAO/WHO are asked to better explain the rationale for this change and invite public comments before implementation. Changes in requirements should be published on-line as amendments to existing guidance, and not requested on an ad hoc basis during evaluations. FAO and WHO should increase their efforts to ensure that all decisions are taken consistently in line with published guidance. – Revision of evaluations after the JMPR leads almost unavoidably to a one year delay in progressing a standard. FAO and WHO are asked to implement procedural changes so that, where necessary, JMPR opinions can be revised prior to the next CCPR meeting. In case of concerns, a peer review by different experts as a second opinion is suggested.
	– For new compounds, periodic reviews, and new uses where new toxicology data is submitted to WHO, consideration should be given to having WHO complete their evaluation one year prior to FAO conducting their evaluation. Having the Health Based Guidance Values (HBGVs) and toxicology assessment of the metabolites well ahead of the FAO evaluation could reduce the amount of time spent during the Meeting conducting the risk assessment. Currently, FAO receives the WHO assessment on the metabolites days before the end of the Meeting, creating significant but unnecessary stress and anxiety.
Quality Control Check in Data Submission	– Quality assurance criteria is set for the data submitted to JMPR for review and evaluation and FAO and WHO explore the practical considerations associated with undertaking some of the work of the JMPR on an inter-sessional basis. – Rationale: This will enhance the credibility of the data and the monographs while the inter-sessional meetings are likely to reduce the workload.
	– Typically when a complete data package is submitted and no issues are identified, the JMPR manages to complete assessments of compounds within a 12 month timeframe. Data packages are usually submitted in the 4th quarter of the year prior to the JMPR Meeting. These data packages are assessed and recommendations made and published in the month following, usually in October. That is significantly faster than many national authorities. – Ensuring that the JMPR evaluator has a complete dataset, by a set cut off date, may help facilitate a more efficient JMPR evaluation. An effective mechanism for JMPR conducing preliminary checks of submission quality may be beneficial. – The current approach is for the JMPR toxicology and residue evaluations to be conducted at the same time, but the completion of a draft toxicology monographs the year before the residue's evaluation is undertaken may allow for more efficiencies for the residues evaluation particularly with regard to the residue definition determination and dietary exposure assessments. This however may require clear identification of potential food and feed metabolites to the JMPR toxicology evaluator by the sponsor and a potential need for the toxicology monograph to be revisited when the residues monograph has been drafted.
Efficiency in Virtual Collaboration	– *Virtual meetings:* Although virtual meetings cannot replace in-person meetings, they could be a mechanism for potentially increasing the number of approvals for smaller and less complex evaluations (e.g. new uses). Virtual meetings cost less to host than in-person meetings and generally require less planning (i.e. no need to book hotels and flights). However, the challenge with virtual meetings is the differing time zones. In recent years, FAO has held a few virtual pre-meetings leading up to the September meeting, with members grouped according to time zones, to go through as many identified issues before the Meeting. However, as these pre-meetings do not involve all FAO experts, consensus can only be reached during the Meeting, where occasionally differing scientific opinions are raised and experts are required to revisit/re-assess decisions previously reached in the pre-meetings. – *JMPR Sharepoint:* FAO created a sharepoint to share information, provide updates, exchange reviews, which has been extremely useful.

Theme	Excerpted Comments on Challenges and Opportunities
	All FAO experts have the opportunity to peer-review the reviews on the sharepoint, ahead of the Meeting, which would facilitate and expedite discussions during the Meeting. However, most FAO experts are so busy with their day-to-day jobs, reviewing/completing their own compounds (on their own time), there is very little time for the entire panel to peer-review the reviews available on the sharepoint ahead of the September meeting.
	– The effective use of virtual meetings and more extensive peer review should be continued with the aim of resolving possible issues in advance of the face-to-face meeting.
	– The virtual meetings held during the pandemic shutdowns highlighted the importance of face-to-face meetings to enable full engagement in discussions of complex issues over a number of days. Particularly given the variety of time zones involved. As a result, for anything other than relatively simple decisions, face-to-face meetings are essential.
JMPR Organizational Structure, Staffing and Resources	
Funding	– Funding is one of the key constraints. If JMPR could employ more staff and pay assessors this would assist.
	– The previous 2002 review of the working procedures of JMPR: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf. This report found that "both the FAO and WHO are severely limited in the financial resources that they can make available for the work of the JMPR due to competing demands on their respective budgets."
	– Position: Developing countries have financial limitations and therefore recommends that FAO and WHO explore the possibility of securing additional funds from donors e.g., Crop Life International to allow the better resourcing of the JMPR. – Rationale: Additional funding shall improve efficiency and increase output.
	– While increasing the capacity of JMPR may address the workload demand, to do so requires increased sustainable funding from various national authorities. However, in the current financial climate, it is questionable whether national authorities will agree to commit funds to support JMPR/CCPR in light of all other national priorities.
JMPR Experts	– Since the shortage of JMPR experts to carry out the evaluation of toxicological and residues dossiers submitted by the agrochemical industry and member countries has been identified as a key contributing factor behind the built-up of the backlog. It is also suggested that CCPR and JMPR shall jointly explore the possibilities and approaches for enrolling more JMPR expert from Member Countries. Equally important is to recruit and train up promising young officers with good scientific qualification and technical experience in the critical domain areas through capacity building and mentorship programme.
	– One option could be the implementation of additional meetings of the JMPR. However, it seems very unlikely that experts already working for JMPR pro bono will be available for more than one meeting. Instead, a second group of experts and an overarching structure would be needed to keep the two expert groups connected and harmonize procedures and evaluations (otherwise, a lack of consistency is likely to occur).
	– Despite the FAO training and recruiting workshops held most recently in 2017 (Ottawa) and 2020 (Chile), these sessions only identified a handful of successful candidates, some of which have joined the JMPR, while others declined due to competing priorities and career opportunities. These last few years, several knowledgeable and experienced experts have retired. While the overall number of FAO experts may not have fluctuated considerably over the last few years, the workload has increased exponentially. As a result, each expert is assigned one new compound or periodic review with up to 3 new uses, which is not sustainable, especially considering that most experts conduct their reviews outside of work hours, on their own time and on a voluntary basis.

Theme	Excerpted Comments on Challenges and Opportunities
	– Recruiting more JMPR experts is very difficult and resource-intensive. Regulatory authorities are not always able to send more than 1-2 experts to JMPR or allocate time during their work hours to conduct JMPR review due to priorities of the national authority. In addition, experts are volunteers and are not compensated for the amount of time spent working on the evaluations. In addition, although the in-person meetings give experts the opportunity to travel, there is very little recreational time for them to enjoy the cities. FAO experts only get one day off (over an almost 3 week meeting) and work late hours. There is a lack of incentive to become an expert.
	– The 2002 JMPR report found that participation of JMPR experts is done on a voluntary basis and requires the support of national regulatory authorities. National authorities may be resistant to allowing their experts to work on JMPR. Given these constraints in resources and staffing, it may be more promising to consider other opportunities that increase the efficiency of the existing evaluation process or re-evaluate the JMPR evaluation model.
	– It is considered that recruiting and training new expertise and retaining existing JMPR expertise is of critical importance. JMPR training sessions for potential new toxicology and residues evaluators may help recruit new experts but additional initiatives to attract and retain experts may be needed. Retaining existing expertise to help train new additions and to complete the more complex evaluations in the short-term is of great importance but care should be taken to not over-burden experienced experts. JMPR experts can spend considerable amounts of their own time preparing JMPR monographs and it has been suggested that a cap on the number of hours JMPR experts can individually spend on monograph preparations prior to the meeting may help attract and retain experts. – Another option for increasing the JMPR expert capacity that should be explored is for the FAO and WHO to employ full-time JMPR evaluators, or second staff on a semi-permanent basis, to draft a certain number of monographs per year. This would assist with providing monographs to the meeting, however it should be noted that there still may be challenges within the current format for enough 'face-to-face' time for discussion of issues. A clear process for peer review for these reports would be required, which may still rely on the resources of the JMPR experts. – JMPR meetings are typically held in Rome or Geneva, but more flexibility in terms of meeting locations may be attractive to JMPR experts, particularly for those based outside of Europe.
	– More experts are needed to expand the capacity of the JMPR panels.
Staffing	– FAO/WHO joint secretariats need additional staff, but not in a position to quantify that demand. – For matters requiring a high degree of specialization, FAO and WHO are asked to add experts to their panels representing multiple geographical regions, including from underrepresented ones.

Table 2: Summary of Comments on Opportunities for Major Reform to CCPR/JMPR and Associated Challenges.

Theme	Comments on Challenges and Opportunities
Use of National Reviews and Data	
Use and Evaluation of National Reviews by JMPR	– In principle this is something that should be explored. It assumes there are national reviews completed when JMPR assesses the compound. Another consideration does there need to be criteria on what is considered an acceptable national review.
	– Recommens the use of National and/or Regional Scientific Data for Risk Assessment by JMPR. The use of these national or regional summaries of data by the JMPR would result in substantial time savings, while allowing the JMPR to concentrate on international risk assessment.
	– We are of the view that there is an opportunity to use the national reviews for JMPR's evaluation. However, the capacity building is also needed to strengthen capabilities of Codex members to fulfil the requirements for JMPR evaluations. Furthermore, the details of each stage of the national review procedure should be thoroughly provided.
	– JMPR experts should consider national reviews in their evaluations. The submission of national reviews to initiate JMPR reviews has been requested by FAO for a long time. These national reviews could be submitted by national authorities in response to the Circular Letters, where all stakeholders are invited to submit relevant information. Therefore, especially the owners/publishers of those reviews should be encouraged to submit this information. Codex could also develop a system of all new national MRL reviews. For periodic reviews of existing MRLs, Codex could refer to private global databases (e.g. Homologa) that can be leveraged as they have tracked global MRL and labels for more than two decades.
	– Given that it may be difficult to change the availability of JMPR resources and staffing, one potential area of opportunity is the use of national-level reviews by JMPR. The relates to current work by CCPR to enable the participation of JMPR in the global joint review of new compounds. The use of national reviews of data was considered in the 2002 review of the working procedures of JMPR and may be helpful to re-evaluate based on advancements by the Organization for Economic Cooperation and Development and regional approaches that may be able to be further leveraged by JMPR.
	– It is unclear what is being proposed by use of national reviews and data. The data packages provided to the JMPR often represent data from several countries. Following review of the data and the regulatory approvals in place at the time of the JMPR assessment, the critical GAP is decided upon the supporting data used to make a maximum residue limit recommendation. – If the proposal is for JMPR to use national reviews of data and the related risk assessment, it is considered that there are pros and cons associated with the potential use of national reviews. There may be efficiencies in terms of monograph preparation if a national review could be used by the JMPR evaluator, for example to produce tables of residue trial results. The Australian Pesticides and Veterinary medicines Authority has an established process for considering international assessments to inform its regulatory decision, but it does not simply adopt the conclusions of that international assessment. If national reviews were to be used by the JMPR, a process will need to be determined to maintain the independence (both perceived and actual) of the JMPR and ensure that the decisions made by the JMPR are consistent with the JMPRs risk assessment framework. The concept of JMPR joint reviews with a national regulator has been discussed recently, but to date lacks any real drive.
	– JMPR consists of experts from many different regulatory agencies and already takes note of National Review documents and data to support their conclusions. A decision on using National Reviews directly for establishing CXLs would be up to the risk managers. They also would have to define the circumstances under which such an approach would be acceptable for Codex Members.

Theme	Comments on Challenges and Opportunities
	– National Reviews often differ from one authority to another due to different science policies and legislative requirements and in many cases because manufacturers often submit different data to each authority. All national reviews have their merits, therefore, it is questionable how JMPR will determine which national review it will rely on. Furthermore, the format and templates used to review toxicology and residue chemistry data are different among the various authorities. If all authorities and JMPR can agree to one standard template/format, perhaps the individual national reviews (excluding decisions) or summaries of each scientific study can be relied upon by JMPR, precluding JMPR experts from recreating tables and entering data.
	– Use of national reviews and data by JMPR must be balanced with the need to maintain JMPR as an independent, international scientific advisory panel. This is a core element of JMPR so clear working procedures would have to be developed to maintain its ability to independently evaluate pesticides when making MRL recommendations.
	– It is considered that the use of national monographs may pose certain challenges with the perception of independence of the evaluation process, as well as requiring permission to be obtained not only from the sponsor but from the national authority for the use of the document.
Alternative Peer Review Models	
Scope of Current Approach and Whether Alternatives are consistent with the Codex Risk Analysis Principals	– Is the current Peer Review model fit for purpose? Is it too extensive or light, or just right. It is not clear what criteria are used for peer review process or the number of persons involved in the peer review process. These could be reviewed as to whether they are still fit for purpose.
	– Alternative peer review models would certainly alleviate the JMPR workload, however, any organization/authority designated as peer-review would need a sound knowledge of residue chemistry data, the Codex Risk Analysis Principles, the JMPR science policies (FAO Manual) and historical JMPR decisions to ensure consistency and accountability.
Engagement on National Reviews	– In order to facilitate the use of national reviews, we encourage the involvement of JMPR experts as observers. Procedurally, JMPR gets involved after a pesticide has been authorized in at least one Codex member state, as a condition for scheduling. For substances that have been nominated, by change of procedures, JMPR experts could be invited as observers to meetings of authorities when decisions are taken on relevant topics, such as the definition of the residue(s), health-based guidance values, and MRLs. This could help to minimize differences between JMPR and national evaluations and to identify data gaps which could be closed prior to information submission to the JMPR. The independency of JMPR Reviewers' conclusions is ensured by the specific JMPR criteria they apply to a dataset summarized by a national review agency.
Other Areas of Reform	
Scope of Evaluations and Default MRLs	– Should the scope of commodities that can have a MRL established be revisited (for example animal feed commodities). If this is reduced then this would reduce the number of submissions and hence the workload for JMPR assessors. – Where a Codex MRL has been established for a new compound, could a default MRL (such as 0.01mg/kg) be also established if there is no dietary exposure concerns. This would assistance by both reducing trade irritants and potentially reducing the number of MRL submissions.
Developing a Continuous JMPR Review Program	– Concerns were raised about whether annual decision making in Codex still meets current demands of Codex members. It was suggested that establishing a permanently existing JMPR working on scheduled submissions as a more appropriate solution to provide scientific advice. In addition, as already mentioned above, providing early advice to the CCPR on the schedule of existing chemistry for periodic re-evaluation could be an important contribution to reduce workload in JMPR and CCPR.

Theme	Comments on Challenges and Opportunities
	– In order to move to a continuously working Codex system, a second virtual CCPR meeting could be established in addition to the annual meeting of CCPR. This additional virtual CCPR could exclusively decide CXLs while the face-to-face CCPR meeting manages CXLs and all other CCPR matters (e.g. eWGs). In order to leverage the efficiencies gained at CCPR, the CAC should adopt the proposed CXLs through a written procedure in addition to adopting CXLs at the face-to-face CAC meeting.

Question 4:

Codex members and observers are requested to provide feedback on the focus of additional stakeholder workshops that aim to expand upon the virtual stakeholder workshop sponsored by CropLife International on March 31, 2022 and summarized in CX/PR 22/53/20. Please provide recommendations on key topics and themes for this follow-up workshop.

13. Following the publication of CL 2022/75-PR, CropLife International Organized two virtual stakeholder workshops on February 23rd and March 7th, 2023. Information on the virtual workshops was provided to EWG participant using the Codex Electronic Forum.[9] Information and stakeholder input from these workshops is not summarized in this discussion paper but may be of interest to both CCPR and JMPR in future deliberation.

14. More limited comments to this charge questions were provided by EWG participants. Specific comments focused on additional are summarized below:

- Future deliberation could benefit by discussing the previous 2002 review of the working procedures of JMPR. In particular, it would be helpful to identify key findings and recommendations that are relevant to current discussion on JMPR's review capacity. It would also be helpful for the follow-up workshop to include participation from a range of stakeholders in the evaluation process, including Codex Members, Observer Organizations, JMPR experts, and FAO/WHO. This will enable engagement of stakeholders and also ensure the viewpoints of JMPR experts that have the greatest understanding of the current process are represented.
- In order to enhance the capacity of JMPR, some major procedural and structural changes will be necessary and should be seriously considered. While little improvements can be made immediately this will not address the structural problems arising from the fact that the JMPR is not a permanent structure supported by permanent staff. If a future workshop is organized, it should primarily focus on how to achieve major structural changes for the future (e.g., by developing a roadmap for such a change).
- Three areas were proposed for future workshops, along with examples:
    - Communication (e.g., ways of working, exchange with data sponsors, IT Infrastructure)
    - Provision of Scientific Advice (e.g., overcome capacity constraints, more meetings, permanent 'JMPR', Practicability of inviting JMPR experts to expert meetings of governments.
    - CCPR (CAC) (e.g., procedural changes in CCPR, bi-annual meetings including one in-person and one virtual, written procedures, procedural changes in CAC)
- Finally, it was noted that other Codex Committees may experience similar challenges. Perhaps there is merit in engaging other Codex Committees to share experiences, exchange ideas and collectively brainstorm on how to make the process more efficient across Codex.

Questions 5:

Do you have any further proposals or recommendation that are not covered by the four previous questions?

15. There were more limited comments on additional proposal and recommendations that were not covered by the previous charge questions listed in CL 2022/75-PR.

16. Specific comments that are not addressed earlier in this discussion paper are as follows:

- One commenter made the following proposals for consideration on budgetary issues:
    - Like FAO, WHO is asked to assign a permanent budget for the provision of scientific advice. While this matter cannot be resolved in CCPR or in the CAC, Codex members are requested to engage when budgets are discussed within the WHO.

9 https://forum.codex-alimentarius.net/viewtopic.php?t=1988

- FAO and WHO are asked to investigate how financial contributions from the private sector could be accepted to support the provision of scientific advice by JMPR and other scientific joint meetings or consultations while keeping FAO's and WHO's independence.
- FAO and WHO are asked to invest more resources into permanent employees for the preparation of initial draft review documents for consideration by the JMPR expert panels. These additional resources could be created using additional funding from governments or via secondment of experts from governments for a 3–5-year period. Full-time reviewers for new compounds could also ensure more concurrent MRL setting with national MRL from countries where new compounds are registered first.
- Use and implementation of Codex standards by members (Codex SDG Goal 3): the Codex secretariat is asked to regularly collect and publish updated information on progress of active adoption of CXLs by national governments and deferral policies for discussion in the CCPR and CAC meetings.

- One commenter noted that there is low participation of experts from developing countries in JMPR activities and CCPR meetings and therefore proposes for facilitation to enhance participation. Considerations of geographical representation should be considered in capacity building of experts, data collection and wholistic participation in Codex CXL setting process.

IV. CONCLUSIONS

17. The EWG has concluded its work and prepared this paper based on the responses received to CL2022/75-PR and is presented for consideration by CCPR54.

18. A total of fifteen Member Countries and three Observer Organizations submitted comprehensive information in response to CL2022/75-PR. Based on these comments, there was consensus in the EWG that there is a need to enhance the operational procedures of CCPR and JMPR to address concerns related to both JMPR's current workload and future demand for compounds evaluations.

19. The EWG sets out a proposed two-step approach for consideration by CCPR. As a first step, this paper is submitted to JMPR for their consideration to identify initial priorities for enhancing its operational procedures and to report back on its findings to the following session of CCPR. At the second step, CCPR will consider the reply from JMPR and based on consultation with the CCPR, Codex, and JMPR Secretariats, as well as FAO/WHO, CCPR and JMPR should identify an appropriate approach to identify potential priorities for enhancement and major structural reforms and develop a roadmap for implementing both enhancements and major structural reforms.

    Potential approaches could include commissioning an independent third-party organization to conduct an organizational assessment or working through an existing Codex advisory body or committee.

V. RECOMMENDATIONS

20. The EWG recommends CCPR54 to consider a proposed workplan and possible schedule to enhance operational procedures of CCPR and JMPR as follows:

    First Step: 2023-2024

(i) CCPR54 to submit this paper to JMPR, through the JMPR Secretariat, for consideration at its regular meeting in September 2023. The paper should be accompanied with the summary of the discussion that took place at CCPR54, based on comments received in reply to CL 2023/39-PR, and any additional recommendations (if any) for consideration by JMPR.

(ii) JMPR to consider the request of CCPR54 and identify initial priorities for enhancing its operational procedures and report back to CCPR55 (2024) on its recommendations and specific areas that may require guidance from CCPR.

    Second Step: 2024 and beyond

(iii) CCPR55 to consider the reply from JMPR, and, based on consultations with CCPR, Codex, and JMPR Secretariats, as well as FAO and WHO between 2023-2024, CCPR and JMPR should identify an appropriate approach to:

    a. identify potential priorities for enhancement and major structural reforms and
    b. develop a roadmap for implementing both enhancements and major structural reforms

APPENDIX I

CONSOLIDATED COMMENTS IN RESPONSE TO "CL 2022/75-PR REQUEST FOR COMMENTS ON THE NEED TO ENHANCE CCPR/JMPR AND THE ASSOCIATED OPPORTUNITIES AND CHALLENGES (ORIGINAL LANGUAGE ONLY)

Summary

Title	CL 2022/75-PR Request for Comments on the Need to Enhance CCPR/JMPR and the associated opportunities and challenges (Id 1974)
Description	Request for Comments on the Need to Enhance CCPR/JMPR and the associated opportunities and challenges
Deadline (extended)	20 February 2023
Review Status	Completed (23 February 2023)

Comments submitted by:

Australia
Canada
Colombia
Costa Rica
Egypt
European Union
India
Indonesia
Iraq
Kenya
New Zealand
Peru
Singapore
Thailand
USA
CropLife International
Grain and Feed Trade Association (GAFTA)

Text	Comment
General Comments	
European Union The European Union (EU) would like to thank the Electronic Working Group (eWG) on Enhancement of work management of CCPR and JMPR chaired by The United States of America and co-chaired Costa Rica, France, Germany and Uganda for the preparation of the discussion paper. The EU notes that besides the present eWG, other eWGs are currently working on the issue of the workload of JMPR and CCPR (i.e. Establishment of CCPR schedules and priority lists, Management of unsupported compounds, National registration of pesticides). For efficiency purposes in time and resource management, the EU believes that this issue would benefit from a more integrated and consistent approach. The EU is concerned about the backlog of evaluations on new compounds, uses, and especially on periodic evaluations. Heavy backlogs show that the current system is not efficient enough to meet the demand today and in the future. The EU also notes that it is challenging to solve this immediately and that there is not one easy solution. In that respect, as an overarching reflection on the model for the future Codex work, the Executive Subcommittee on the future of Codex could be a place that could effectively tackle some of the challenges currently faced by CCPR and JMPR. *Category : SUBSTANTIVE*	
Indonesia In response to the CL 2022/75-PR (Request for Comments on the Need to Enhance CCPR/JMPR and the Associated Opportunities and Challenges), Indonesia proposes following comments to enhance the operational procedures of CCPR and JMPR and the associated opportunities and challenges: 1. In line with the result of CCPR53, we support the consideration of a second or possibly subsequent workshops that would expand on and further develop some of the themes addressed in the virtual workshop sponsored by CropLife International on March 31, 2022, as described in CX/PR 22/53/20. This activity is stated in the ToR/the framework of EWG established to enhance operational procedures of CCPR and JMPR and the associated opportunities and challenges. 2. In order to support JMPR role in conducting the independent international evaluation of pesticide residues, it is necessary to consider the expert recruitment "call for expert" for encouraging extensive and meticulous work of JMPR in evaluating the huge of submitted scientific data. 3. Considering the lack of financial resources for JMPR work, to generate pesticide residues evaluation, we are of the view that it would be possible to engage cooperation with other dialogue partners/development organizations/industry associations with the commitment to the independency and impartiality principles. 4. Considering that the large amount of work for CCPR and the increase of JMPR evaluation proposals, as well as limited resources, we propose setting a scale of prioritization. Prioritization mechanism/approach would be helpful for example, in selecting the work, and allowing the establishing of long-term planning and work management. The Development of such approach could be done by establishing narrower scope of ewg or other suitable methods. *Category : SUBSTANTIVE*	
Peru "En relación al documento CL 2022/75-PR, comentarle a modo general que como país miembro del Codex, es necesario mejorar los procedimientos operativos del CCPR y la JMPR para satisfacer la demanda mundial de evaluación de nuevos compuestos, usos y revisiones periódicas, para esto sugerimos lo siguiente: 1. Tener más reuniones presenciales de la JMPR, evitar cancelaciones y ampliar su capacidad de revisión. 2. Aumentar los recursos financieros disponibles para este trabajo para evitar la acumulación de plaguicidas en espera de revisión. 3. Considerar aumentar el número de profesionales para la revisión de nuevos compuestos, usos y revisiones periódicas, y si es posible considerar un pago por sus servicios". *Category : SUBSTANTIVE*	
For background information, please see CL 2022/75-PR	
Iraq Agree *Category : SUBSTANTIVE*	

Text	Comment
Australia The Australian delegation to CCPR welcomes the opportunity to comment on CL 2022/75-PR, the request for comments on the need to enhance CCPR/JMPR and the associated opportunities and challenges. The development of MRLs is the key role of CCPR and JMPR work is integral to that role. Australia would again like to emphasise that the scientific rigour of JMPR evaluations should be maintained at a high standard. We will start by referring to CX/PR 11/43/15 which was presented as Agenda Item 13(a) at CCPR43 in 2011 as that Discussion paper on JMPR resource issues in the provision of scientific advice to CCPR highlighted many issues which remain relevant today. *Category : SUBSTANTIVE*	
Codex members and observers are invited to provide information on the need to enhance the operational procedures of CCPR and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) and the associated opportunities and challenges by providing replies to the questions below.[1] This information will be used by CCPR and JMPR in 2023 to further explore how to improve the existing system to meet current and future demand for JMPR evaluations.	
India Comment: 1) Increase the number of meetings /delegates/groups/members 2) a) JMPR meetings preferably twice a year (maybe one virtual and one physical, keeping in view the finances involved) b) Increase resources and involve more subject experts c) strategic planning is a must by core committee of WHO/FAO before initiating the above procedures 3) Concerns w.r.t. opportunities and challenges to be met by proper planning both from an administrative angle and work execution 4) Small exercise by the secretariat needs to be done - a) Engage/appoint/involve more of individuals/ suitable/subject experts (Qualification to be mentioned beforehand so that applications are submitted/received accordingly) b) Either float an advertisement on the website for interested volunteers or ask the already existing members to engage/nominate/recommend some part-time candidates who can assist them. c) Some remuneration (amount to be decided) may be given for a specific quantum of work done by the individual d) Need-based secretarial staff can also be increased Rationale: For regular updation and to get the backlog finished/job done and in order to facilitate completion of backlog and streamline the work in future *Category : TECHNICAL*	
CropLife International Background CropLife International welcomes the opportunity to provide comments on the need to enhance JMPR's and CCPR's output. CropLife International is the global federation representing the plant protection and plant science industry, made up of six member companies that research, manufacture and sell crop protection and plant biotechnology products. The organization also serves a global network of regional and national associations which spans more than 90 countries. Capacity issues of JMPR have been discussed in the CCPR meeting for more than two decades. However, satisfactory solutions have not been found, or implemented yet. For this reason, Maximum Residue Limits (MRLs) for new and innovative pesticide active substances cannot be reviewed in a timely manner, i.e. innovation does not reach farmers. Codex MRL applications queue on the priority list for several years. At the same time, the interval for periodic reviews of established Codex MRLs has been extended from 15 to up to 25 years due to capacity constraints. As a consequence, as CropLife International described earlier, proposals for new work need to be postponed and new active substances remain in the queue before they can be evaluated.(1,2) In 2021, CropLife International reviewed the 2002 WHO/FAO report, and observed that certain needs for improvement which were identified in 2002 still remain unsolved.(3) For example, the complexity of required scientific information has increased significantly in the last two decades and presents an even higher burden on JMPR experts, while opportunities have been missed to develop state of the art IT tools to support JMPR's work.	

Text	Comment
While one priority for CropLife International is to support Codex processes to set pesticide MRLs, it is also important that Codex MRLs are used by Codex members. Therefore, CropLife International suggests to establish a permanent agenda item at CCPR where Codex members report on the use of CXLs. This would be an excellent implementation of Codex Strategic Goal 3, to increase impact through the recognition and use of Codex standards.(4) 1. Enhancing operational procedures of JMPR and CCPR to eliminate the backlog of evaluations and meet the future demand of establishment CXLs Available at: https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-53%252FWDs%252Fpr53_20e.pdf 2. Comments by CropLife on Agenda Items 4a, 16. Available at: https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-52%252FCRDs%252Fpr52_CRD11x.pdf 3. 2002, Report on the Review of the Working Procedures of JMPR. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf. 4. Codex Strategic Plan 2020-2025 https://www.fao.org/fao-who-codexalimentarius/publications/en/ *Category : SUBSTANTIVE*	
***Question 1**: Please comment on the need to enhance the operational procedures of CCPR/JMPR to (i) eliminate the backlog of compounds evaluations caused by the cancelation of JMPR meetings due to the COVID19 pandemic and (ii) expand its review capacity to meet the future demand. If possible, please organize your response using the suggested categories below.*	
Australia The Joint Meeting on Pesticide Residues (JMPR) continues to be essential for the independent international evaluation of pesticide residues and the MRLs which are supported by the Codex Committee on Pesticide Residues (CCPR) remain very important for facilitating the international trade of agricultural produce. Australia is grateful for the good work that JMPR and CCPR have done over many decades but considers that there is a need to enhance the operational procedures of CCPR/JMPR going into the future. We consider that there is a need to eliminate the current backlog of new evaluations and periodic reviews, particularly those of higher complexity which have not progressed in recent virtual meetings. We also consider that there is need to increase JMPRs future review capacity as it is anticipated that number, size and complexity of assessments to be conducted by JMPR in the future will increase. The current JMPR workload is very high. The 2022 JMPR evaluated 34 compounds of which 7 were new compounds and four were periodic re-evaluations. As noted in the 2002 JMPR Report General Consideration Item the Needs of JMPR it was noted that "voluntary contributions by individuals of their own time, is not sustainable with the increasing workloads and the complexity of modern evaluations". In the intervening 20 years the complexity of evaluations has increased substantially, as has the workload. Further the pressure to finalise assessments, particularly for individual experts responsible for multiple compounds, is unrealistic. The 2002 JMPR General Consideration Item also highlighted that the "system has become unsustainable and without additional resources it will fail sooner rather than later". Australia's preference is that resources to conduct the work of JMPR are increased, but if that is not possible then expectations of Codex members and compound sponsors needs to be balanced with available JMPR resources. *Category : SUBSTANTIVE*	
Canada Canada recognizes that there is a need to enhance the operational procedures of JMPR in order to address the backlog of compound evaluations as well as to address the future workload demand of compound evaluations. Canada shares the opinion that the biggest hurdle to overcome the JMPR workload is capacity building and the need for more FAO/WHO experts to carry out the compound evaluations. However, finding experienced resources has presented its own challenges. Despite the FAO training and recruiting workshops held most recently in 2017 (Ottawa) and 2020 (Chile), these sessions only identified a handful of successful candidates, some of which have joined the JMPR, while others declined due to competing priorities and career opportunities. These last few years, several knowledgeable and experienced experts have retired. While the overall number of FAO experts may not have fluctuated considerably over the last few years, the workload has increased exponentially. As a result, each expert is assigned one new compound or periodic review with up to 3 new uses, which is not sustainable, especially considering that most experts conduct their reviews outside of work hours, on their own time and on a voluntary basis. While increasing the capacity of JMPR may address the workload demand, to do so requires increased sustainable funding from various national authorities. However, in the current financial climate, it is questionable whether national authorities will agree to commit funds to support JMPR/CCPR in light of all other national priorities.	

Text	Comment
It should also be noted that while increasing JMPR capacity may result in a greater number of reviews, all these reviews must be peer-reviewed and approved by each individual Panel (FAO/WHO). This approval process must be made during the 2 and a half week meeting in September, which is not likely to be sufficient time to do so, and increasing the duration of the meetings is also not a feasible option. *Category : SUBSTANTIVE*	
Costa Rica 1. Organizar la agenda de las reuniones presenciales de la JMPR para que se aborden temas en los que es trascendental la presencia física de los expertos a fin de solventar una posible afectación en la toma de decisiones de la JMPR y que permitan atender de manera oportuna las necesidades de del CCPR. 2. Incrementar la frecuencia de reuniones virtuales en las que se puedan debatir temas en los que la presencia física no es trascendental. *Category : SUBSTANTIVE*	
Egypt Egypt suggests creating an electronic platform/portal to facilitate and enhance the JMPR work in order to eliminate the backlog of compounds evaluations caused by the cancelation of JMPR meetings due to the COVID19 pandemic and to expand its review capacity to meet the future demand. This platform will include the current workload of new compounds and future workload as well as an extensive database of experts to cover all areas of the JMPR work. *Category : SUBSTANTIVE*	
European Union Currently, the annual JMPR Residue Meeting, hereafter referred to as "meeting", lasts for 9 days (including weekends) with a typical agenda of 12 - 15 full compound assessments (new compounds or periodic reviews) and 15 - 20 compounds with additional uses for MRLs. Normally, significantly less than one day remains per compound for assessing all relevant endpoints, deriving the residue definitions, reviewing all supervised field trials, estimating MRLs for plant and animal commodities, conducting long- and short-term dietary risk assessments and putting all this in written form. Without changing the level of depth and independence of evaluations, increasing the capacity to review more compounds (e.g., by providing resources to recruit more experts) is not necessarily expected to increase the number of final outputs, since insufficient time to make scientifically sound joint decisions during the meeting is currently the bottleneck. It would be helpful to task the FAO/WHO Secretariats to survey (e.g., by requesting JMPR experts' experience): • the usual time required during meetings for the evaluation of a new compound and for evaluation of a substance under the periodic review program (assuming all relevant preparations have been completed before the meeting, such as preparing close to final, internally peer-reviewed evaluations and appraisal documents), • the usual time required during meetings for new MRL assessments and • the usual time required during meetings for general issues like responses to CCPR or General Items. Based on this information, the workload and prioritization of the meeting agenda could be aligned with the available timeframe and required additional resources could be quantified and appropriate measures taken on that basis. All these considerations apply also to the toxicological evaluation of compounds by WHO experts. An increase in the number of experts involved might increase the quality of monographs (if there are two monographers working on the same compound) and perhaps reduce the workload for individual monographers but will not necessarily increase neither the quantitative output of the meeting nor the quality of discussions. Apart from the above considerations, the EU is strongly in favour of a stringent approach for deleting compounds from the system that are no longer supported by a manufacturer. The 4-year rule already exists for unsupported substances and the 25-year rule is laid down in the Codex procedural manual, but it is not implemented in CCPR in a strict way. Notably, the procedural manual clearly states that "the proposed MRL is maintained for a period of no more than four years" and that when "there is no commitment to provide additional information, or no data are supplied despite a commitment being made in relation to the four-year-rule, the CCPR considers withdrawal of the draft MRL .". The EU believes, that in such cases, a clear decision should be taken by CCPR to withdraw such substances. Consequent withdrawal of the corresponding CXLs will contribute to reducing the number of substances for which a periodic review is overdue.	

Text	Comment
In addition, the EU notes that the number of active substances with the reference "Awaiting advice on supported commodities" increases from year to year. In this regard, the EU would also like to call upon the data submitters to meet their commitments in a timely and comprehensive manner. Here too, a more stringent use of the rules laid down in the Procedural Manual would be necessary. *Category : SUBSTANTIVE*	
India Comment: 1.1 Ensure that Current workload of new compounds may be categorized subject wise and for preliminary screening and literature search fresh candidates (as suggested earlier) of particular subject may be delegated the task who would compile information on uses etc. of the new compound which would help the member expert to do the periodic evaluations strait without wasting further time. 1.2 This would fruitful for managing Future workload demand for new compounds, uses, and periodic evaluations 1.3 The above planning would enhance the operational procedures of CCPR/JMPR Rationale: Updation of backlog thereby would help the Secretariat in betterment of the existing/current system By adopting this procedure, future can be met with current technology and work could be planned and performed efficiently on time to facilitate trade globally *Category : TECHNICAL*	
Thailand In principle, Thailand supports the TOR of EWG to enhance operational procedures of JMPR and CCPR. We encourage the balanced evaluation among all three areas of work undertaken by JMPR, including, new active ingredients, new uses, and re-evaluation. According to the analysis by CropLife International, the number of pesticide active ingredients for re-evaluation are very low. Hence, the working mechanism still needs to be improved in order to avoid international trade problems because of the lack of MRLs. *Category : SUBSTANTIVE*	
USA The United States appreciates the efforts of JMPR to conduct comprehensive evaluations and recognizes the unique challenge posed by advancing work virtually during the Covid-19 Pandemic. The United States does not have specific comments on the CCPR/JMPR's current workload and future capacity and looks forward to gaining insight from other Codex Members and Observers on the need to expand review capacity. With respect to concerns about the backlog of compound evaluations, future enhancements to the operational procedures of CCPR/JMPR may want to focus on more clearly communicating the impact of the cancelation of physical meetings on the schedule of reviews for JMPR and providing a more detailed workplan to Codex Members, Observer Organizations, and sponsors that provides a status update on reviews that have been initiated by JMPR, whether they will be delayed, and indication of a target completion year by JMPR. This workplan could also include information on how the backlog has impacted the future schedule and priority list for JMPR and can inform deliberations on whether additional action is needed by CCPR/JMPR to expand its review capacity (e.g., convene a future extraordinary meeting). *Category : SUBSTANTIVE*	
1.1 Current workload of new compounds, uses, and periodic evaluations	
Colombia Tener en cuenta que las evaluaciones de nuevos compuestos solo puedan ser ejecutadas (pruebas de campo) por países miembros de Codex con tradición productora y exportadora del producto sujeto a evaluación; así mismo que las observaciones, retroalimentación y correcciones a los informes de pruebas de campo sean realizadas solo por países miembros del Codex con tradición productora y tradición importadora del producto objeto de evaluación. *Category : SUBSTANTIVE*	
Kenya Kenya proposes that due to the heavy workload of the CCPR/JMPR there is need to reform the operational procedures to enhance capacity of JMPR. Rationale: The backlog has been caused by the initial evaluation of new compounds, periodic review, and Covid-19 pandemic. *Category : SUBSTANTIVE*	

Text	Comment
New Zealand • To reduce the backlog, it would seem the most realistic option would be to hold an extra meeting(s). However, the funding and logistics of this could provide difficult. *Category : TECHNICAL*	
CropLife International To overcome the current backlog, which became more critical with the onset of the pandemic, FAO and WHO are requested to – − Organize two JMPR's per year, until the backlog is resolved. − Prioritize the training and selection of new experts, particularly from currently under-represented regions sin support of Codex capacity building goals. − Consider making more use of national reviews of active ingredients in JMPR reviews, as previously summarized data. This could be very useful to catch-up on the ever growing gap with significantly longer lists of national MRLs. This could also help to reduce the work for substances undergoing the periodic review. Employers of Reviewers are requested to: Support the additional hours for JMPR reviews and allow these reviewers to complete this work as part of the normal work assignment. *Category : SUBSTANTIVE*	
GAFTA Gafta represents the international trade in agricultural commodities since 1878 and is an observer member of Codex. Gafta members are transporting up to 1 million tonnes of agri bulk commodities around the world every day, from surplus to deficit countries to ensure food security. We represent 2000 companies in over 100 countries, with over 80% of the world's grain shipped according to Gafta standard contract terms. Our members are very supportive of Codex standards which are international and ensure that food is safe and can be traded. Empowering Codex to perform its role more effectively and efficiently by addressing current capacity challenges, embracing new scientific and administrative methods of evaluation, and ensuring adequate resources are available, is essential to global food security, safety and trade. We promote Codex standards because they are based on sound science, promote alignment between export and import countries and encourage trade facilitation. Harmonised international Maximum Residue limits are supported by the trade but, nonalignment is a daily concern as several Codex member countries are not using these standards. We are very aware of the backlog of compound evaluations that has grown in JMPR due to Covid 19 and we appreciate this places huge pressure and demand on Codex and JMPR services to evaluate increasing volumes of data. Additionally, there is also an increasing number of active substances and their re-evaluations and the current system simply cannot keep up with demand. The Croplife analysis clearly demonstrates these challenges in terms of new active ingredients, new uses and re evaluations, and highlights need to find new solutions to ensure the system is more efficient and streamlined in terms of collecting data. We also support the need for availability of more scientific experts and the need for sustainable funding of Codex. These improvements will also encourage Codex Members to use these international standards. Enhancing operational procedures at Codex will ensure an increasing number of MRLs can be established. Gafta is supportive of the ongoing work within the electronic working group which is looking to see how to improve the existing system to meet current and future demands and to expand. A fully functioning adequately financed global Codex MRL system would significantly facilitate trade and make it easier for growers and exporters to produce compliant crops and avoid market access risks. *Category : SUBSTANTIVE*	
1.2 Future workload demand for new compounds, uses, and periodic evaluations	
Colombia Focalizar las pruebas de campo y evaluaciones de sus respectivos informes de ejecución solo en las regiones y países directamente implicados en el comercio consumo y producción del producto estudiado. *Category : SUBSTANTIVE*	

Text	Comment
Kenya Position: Kenya notes that there has been insufficient data of specific compounds and lack of coordination in data collection and submission to JMPR from various National Authorities. Kenya, therefore, proposes that, there is need to increase the pool of experts and enhance their capacity. The experts should be recruited and facilitated as need arises. In addition, consider regional reviews of pesticides, harmonization with other international pesticide activities and 'Contracting out' of data review to scientific service companies. Rationale: These measures shall enhance the output and efficiency and hence reduce future workloads to manageable levels. *Category : SUBSTANTIVE*	
New Zealand • The answers to question 2 below cover this question *Category : EDITORIAL*	
CropLife International Increase the number of JMPRs per year: We believe that two JMPRs per year are needed to cope with the workload to address current and future needs for Codex MRLs, as the current practice of one JMPR per year resulted in a significant backlog even before the pandemic. One of these JMPRs could be virtual and focused on new uses in order to reduce the burden of JMPR's full panel. Ideally, JMPR can adopt an ongoing review process with the help of digital tools (Teams, PowerBI, PowerApps, password protected portals, etc). Increase the number of experts/reviewers for JMPR CropLife International believes that adding more experts to JMPR is indispensable, particularly for underrepresented regions. As current JMPR panels are already quite large it might be more effective to create two different experts panels for two JMPRs per year. CropLife International would also like to encourage more countries to enable national experts' time to support JMPR review. Efficiency gains by better communication: Establishing virtual joint meetings between Data Sponsors and WHO/FAO experts to discuss open scientific questions should become a routine procedure. Unresolved matters regularly lead to delays in JMPR which then need another round of evaluation, thus adding to the backlog and increasing the burden on the already limited JMPR resources. See as well below our response 'to other reasons to enhance the operational procedures in CCPR/JMPR'. *Category : SUBSTANTIVE*	
1.3 Other reasons to enhance the operational procedures of CCPR/JMPR	
Colombia Teniendo en cuenta la vocación productora agrícola, capacidad técnica y administrativa de cada país miembro se incentive el delegar a equipos de trabajo con un mayor número de profesionales para el apoyo de los asuntos relacionados con CCPR / JMPR. *Category : SUBSTANTIVE*	
Kenya Position: Kenya proposes that FAO/WHO Codex Alimentarius Commission develop a strategic objective to guide future changes to enhance operational procedures of CCPR/JMPR. Rationale: This will give guidance and direction in the operationalization of these procedures. *Category : SUBSTANTIVE*	
Singapore Singapore agrees that there is a pressing need to address the evaluation backlog built up at JMPR over the years, especially pertaining to the periodic toxicological re-evaluation of legacy pesticides, many of which have well passed 25 years since the last JMPR review. These overly due periodic toxicological review could mean the related legacy pesticides are being used with high uncertainties with respect to their public health implications. *Category : SUBSTANTIVE*	

Text	Comment
CropLife International Communication: CropLife International suggests FAO/WHO to organize teleconferences and virtual meetings (e.g. software and internet connectivity that enables video conferencing, real-time chat and sharing of presentations and documents) with sponsors prior to and during JMPR, to clarify open questions, to reduce the rate of 'not proposed' standards especially in cases where JMPR considers submitted data as incomplete for decision taking. Guidance might be available from national regulatory authorities/agencies on how they organize the exchange of information with registrants/data sponsors without compromising their independence. Other observations: CropLife International suggests considering the very detailed observations reported in a case study on rice MRLs conducted for FAO (2020).(5) The authors provide an analysis of risk assessment (Part B1) and risk management methodologies (PartB2). The points that are important in CropLife International's view for the CCPR's consideration are: o Part B1: Risk assessment: When FAO and WHO are introducing new data requirements which are specific to JMPR reviews, but not generally required for national regulatory approval, submission of that information should be considered as optional and following OECD updated guidelines and guidances, if available. Otherwise, it is unlikely that new substance will pass the JMPR review. CropLife International strongly supports that regulatory assessments need to be in sync with scientific developments, however, there needs to be a certain scientific consensus before latest scientific developments are applied in regulatory decision making. CropLife International believes that Codex as standard setting body, and given its capacity constraints, is not the most suitable forum to discuss and to reach scientific consensus on emerging topics. CropLife Internationals suggests that those are better addressed in other fora that are resourced accordingly (such as OECD). CropLife International's recommendation is that new concepts are validated before their implementation at JMPR, and registrants should provide the necessary data upon request. – Differences in Health Based Guidance values (HBGVs): CropLife International acknowledges the authors' observations but notes that some conclusions, for example, observed minor differences in HBGVs set by JMPR and Codex members might be less relevant for staple food, but are of significant importance for specialty crops. For substances that have been nominated, by change of procedures, JMPR experts could be invited as observers to meetings of authorities where decisions are taken on relevant topics, for example the definition of the residue(s), HBGVs, and MRLs. This could help harmonization between JMPR and national evaluations and to identify data gaps which could be closed prior to information submission to the JMPR. – MRL differences due to different residue data sets: Sponsors always aim to submit the global data sets supporting the most critical GAP available which leads to the highest MRL. Due to new regulatory approvals these data might become available after the submission to JMPR. Due to JMPR's high workload, the CCPR decided to not review new data year after year, but to review when a 'bundle' of new information is available. An exception to this rule should be allowed where new data can justify significant change in the existing Codex MRLs. o Part B2, risk management: The authors note that only EU, Japan, Australia and now the UK have a procedure in place to review national MRLs once CXLs are adopted. While there is a mechanism in the World Trade Organization (WTO), according to which members need to notify in case they do not implement Codex MRLs, a similar mechanism in Codex where Codex members confirm acceptance of CXLs (not rejecting traded commodities with residues at CXL level) would be a major contribution to enhanced transparency of Codex standards use as stated in Goal 3 in Codex strategic plan. CropLife International suggests that this matter is included as a permanent item in CCPR's agenda and that all members share information of the acceptance of newly adopted CXLs. (5) FAO (2020) Understanding international harmonization maximum residue limits with Code standards. A case study on rice. Rome https:// doi.org/10.4060/cb0463en. *Category : SUBSTANTIVE*	
***Question 2**: Please comment on opportunities to enhance the operational procedures of CCPR/JMPR to improve the efficiency of the evaluation process and increase JMPR's evaluation capacity. Please consider both opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes) in your comments. If possible, please organize your response using the suggested categories below.*	
Costa Rica Incrementar la cantidad de revisiones de la JMPR. A continuación se citan algunas sugerencias para mejorar los procedimientos operativos:	

Text	Comment
• Que el expediente e información que envía el patrocinador de datos esté completo y claro para que una vez que la JMPR inicie el análisis le facilite la revisión, • Aumentar la cantidad de expertos en el proceso de análisis para agilizar la revisión. En el mismo sentido, se podrían reconocer evaluaciones de otras entidades, autoridades nacionales u organizaciones reconocidas, bajo los principios del CODEX, sobre una determinada molécula. *Category : SUBSTANTIVE*	
European Union The following reply covers question 2 and 3. Under the current expectations to provide independent and science-based recommendations to CCPR, capacity of JMPR has peaked. As outlined for Q1, the current bottleneck is the time during the meetings and not the capacity of experts in meeting preparation. Consequently, changes in data submissions will have limited impact on the efficiency. The utilization of remote sessions in advance of the annual JMPR meeting is already in place. However, this format does not provide the opportunity for in-depth discussions and is very inefficient when compared to physical meetings (see General Item 2.1 of the 2021 JMPR Report). JMPR consists of experts from many different regulatory agencies and already takes note of National Review documents and data to support their conclusions. A decision on using National Reviews directly for establishing CXLs would be up to the risk managers. They also would have to define the circumstances under which such an approach would be acceptable for Codex Members. One option could be the implementation of additional meetings of the JMPR. However, it seems very unlikely that experts already working for JMPR pro bono will be available for more than one meeting. Instead, a second group of experts and an overarching structure would be needed to keep the two expert groups connected and harmonize procedures and evaluations (otherwise, a lack of consistency is likely to occur). Another option might be the participation of JMPR experts in joint national reviews. Furthermore, as already stated above, under certain circumstances the direct use of final regulatory dossiers instead of preparing detailed evaluation documents by JMPR could be an option. However, while this scenario might reduce preparation efforts, it provides only limited benefit for the Annual Meeting. The time needed for discussions and decisions on each endpoint during the Meeting still remains the bottleneck. Regarding the toxicological assessment, the following further considerations/observations are added: • A general experience from the last years is the increasing demand for assessment of metabolites. Very often, it becomes clear only during the meeting which of the metabolites are in fact relevant for FAO evaluation resulting in pressure on WHO experts to perform a very quick and perhaps too superficial assessment that must be revised later. On the other hand, the WHO monographers might waste time by thoroughly assessing metabolites that are of no concern for residues evaluation. To the extent possible, communication between FAO and WHO monographers should take place long before the meeting by exchange of available information on the metabolites and on possible needs for additional assessment. • As it goes on now, the first half of the WHO experts' meeting is used for introduction of the substances to the auditory and the discussion on certain critical points. The number of discussion points, length and depth of discussions is very different, depending very much on the selection and preparations made by the respective monographer and the reviewer. Perhaps, sometimes, discussion of "not that important points" (e.g., not relevant for ADI/ARfD, for evaluation of CMR properties or on metabolites that are included in the residue definition) might take too much time whereas others are overlooked. Indeed, efforts have been made to improve this situation by assignment of two additional reviewers for each monograph just before the meeting. If this review would be scheduled earlier, the outcome could be used by the WHO secretariat to determine the issues that need to be discussed in the first week. The discussions would be expected to be more focused then. On the other hand, this approach could contradict that one taken in the second half of the eeting when the "Report items" must be agreed word by word, in a very time-consuming process. For this exercise, the complete toxicological profile of a substance under evaluation must be taken into consideration anyway. It might be worth thinking about changing the sequence, i.e., to start with general introduction of the substance, using the list of endpoints, the draft report item and considering the reviewers' comments. During these presentations, it would become clear which are really the critical points for each substance to be discussed in depth afterwards. The last step would be then to agree on final changes in the Report item. Therefore, as a first step the EU suggests exploring and mapping all the possible non costly ways to enhance the operational procedures like improving templates and forms to enable expedited reviews and evaluation reports. The feedback could be also collected from the JMPR experts and industry to see which parts can be improved. The EU also highlights the importance from the industry ide to be more proactive and send complete data packages in order to ensure that assessments are carried out without delay. For periodic reviews, the industry already knows the schedule many years in advance and can commit themselves to prepare the data packages well in advance.	

Text	Comment
In parallel, a thorough analysis/impact assessment of the feasibility for more structural changes of the existing system should be carried out as it is unlikely that the steps proposed above will be sufficient on their own. The following are possible options to be evaluated: • JMPR could consider using evaluations carried out by other risk assessment bodies as a first step in the evaluation process. This would free time of JMPR experts, and the number of evaluations could be increased. • A pilot project could be set up on running a permanent risk assessment body for a certain period, i.e., 3 years. For this, an assessment of costs/benefits is needed, which would for instance compare the current costs of temporary JMPR meetings with the possible future ones on a permanent risk assessment body, considering also the expected savings in the long term due to faster procedures and the benefits for consumer health protection resulting in an expected decrease of health-related costs. The EU acknowledges that such an impact assessment and the funding for a possible pilot project should be discussed at the CAC level. However, increasing the scientific production of JMPR alone would not be sufficient to extensively address the challenges faced, and CCPR would also need to undertake structural changes. In its zero draft , the Executive Subcommittee on the future of Codex notes in paragraph 3.2.2 that some committees, overloaded with work, could schedule extraordinary sessions focussing on specific agenda items in order to alleviate the timetable of the main ordinary meetings. In that perspective, the EU notes that CCPR would certainly benefit from such a "need-based approach". *Category : SUBSTANTIVE*	
India Comments: 2.1 Opportunities for Enhancement For improvements to existing processes kindly refer to the comments given for Question 1. For major reform (e.g., governance and structural changes) it is suggested that for any new appointee, a confidentiality clause should be mandatory and for governance Further, a small exercise by the secretariat needs to be done – a) Engage/appoint/involve more of individuals/ suitable/subject experts (Qualification to be mentioned beforehand so that applications are submitted/received accordingly) b) Either float an advertisement on the website for interested volunteers or ask the already existing members to engage/nominate/recommend some part-time candidates who can assist them. c) Some remuneration (amount to be decided) may be given for a specific quantum of work done by the individual d) Need-based secretarial staff can also be increased 2.1.1 Data Sponsor Dossier and Electronic Data Submission is essential for keeping digitalisation in view and unnecessary paperwork. Therefore this should be made compulsory for the data submitters/stakeholders/industry etc. Rationale: With changing global scenario, the challenge has to be accepted. This is definitely a big challenge and a herculean task for the Secretariat, but once executed the functioning would be streamlined for the future. For 2.1.2, 2.1.3 and 2.1.4, it is suggested that the Secretariat along with permanent members would be able to assess and execute the procedures and working 2.1.5 Other Areas of Enhancement could be that Industry/academia/stakeholders should follow a standard pattern to undertake studies/tests before submitting the national data for evaluation Rationale: Repetition/Duplication of results can be avoided if Standards are maintained 2.2 Opportunities for Major Reform do exist but constrain is the requirement of manpower and infrastructure for which strategic planning is to be done 2.2.1 Use of National Reviews and Data and 2.2.2 Alternative Peer Review Models could be used to save time while reviewing new compounds or otherwise. Rationale: Enhanced manpower and infrastructure would facilitate the functioning. 2.2.3 Other Areas of Reform include – a) stick to time frame b) workshops may be organised for all stakeholders preferably by Universities/Industry etc. working in respective fields c) Engage retired persons who have knowhow of their subject and are experts in their field Rationale: Reforms mentioned would definitely enable to improve the existing system to meet the current and future demand of JMPR evaluations. *Category : TECHNICAL*	

Text	Comment
GAFTA Gafta members do not participate in Codex/JMPR procedures but are supportive of the suggestions outlined by Croplife International to improve the operational procedures of CCPR and JMPR. We support solutions which will improve data submissions, streamline templates for submissions, increased sustainable funding, resourcing JMPR as experts are voluntary but more experts are needed to expand the capacity of JMPR panels. *Category : SUBSTANTIVE*	
2.1 Opportunities for Enhancement	
Colombia Dada la naturaleza de trabajo voluntario de evaluaciones y generación de aportes sobre los temas tratados en los comités, se puede pensar en la expedición de certificados de participación para los profesionales (externos y los vinculados a entidades oficiales) que contribuyan con su tiempo libre a los propósitos tratados en CCPR/JMPR sirviendo como un estímulo que haga más atractiva la propia participación y aporte de tiempo a un mayor número de profesionales; lo que consecuentemente puede aumentar la capacidad de trabajo de cada comité nacional. *Category : SUBSTANTIVE*	
Egypt JMPR Organizational Structure, Staffing and Resources *Category : SUBSTANTIVE*	
2.1.1 Data Sponsor Dossier and Electronic Data Submission	
Australia It is considered that if data submissions could be made available to JMPR reviewers in a timely and consistent format which reduces the need for data entry, clearly identifies all food and feed metabolites and addresses all data requirements, then this should increase JMPR's efficiency. Ensuring that data submissions clearly address identified issues, and the avoidance of submissions which do not provide for the updating of relevant end points would assist in focusing work, and avoid committing evaluator time without a concrete outcome from the JMPR process. The submission of incomplete data packages for new compounds and periodic re-evaluations can result in a significant waste of time and resources. Contemporary templates or electronic formats which ensure the onus on the sponsor to provide "user friendly" dossiers could provide substantial productivity improvements. Additional training through workshops on JMPR requirements for data packages could also be helpful. *Category : SUBSTANTIVE*	
Canada o Data submitters should ensure to submit the same data as that submitted to all national authorities. o Data submitters are strongly encouraged to use a similar format to that which is in the JMPR Evaluations to generate the dossiers, especially the residue tables, as experts spend a considerable amount of time reformatting the dossier to meet the JMPR formatting requirements. o When crop field trial data do not reflect the critical GAP, FAO experts spend a considerable amount of time trying to be flexible, attempting to "fit" the data to the critical GAP. o To reduce the number of new uses for the same compound being reviewed at different Meetings, sponsors should consider maximizing the number of uses requested within one petition. o In recent years, metabolites were not consistently named in the WHO and FAO dossiers, making it very difficult to cross-link the metabolites, and ensure the appropriate and correct ones are considered in the residue definition. o Additional scientific and robust data on the toxicology of major plant and animal metabolites would assist in refining the residue definitions for risk assessment and limit the frequency of conducting metabolite-specific risk assessments based on Cramer Classes, which are very time consuming. *Category : SUBSTANTIVE*	

Text	Comment
Kenya Position: Kenya proposes that there is need to develop a quality criterion to be used by the Data Sponsor Dossier and Electronic Data Submission to enhance credibility and verifiability of the JMPR global monographs. In addition, the sponsors should provide sufficient and current data within a specified time frame for efficient evaluation of pesticides to completion. Rationale: Electronic data submission shall save time while quality criteria will enhance the credibility of the monograms. *Category : SUBSTANTIVE*	
New Zealand • The sponsor ensures it submits all the data in the correct format *Category : TECHNICAL*	
Thailand We are of the view that there is an opportunity to use electronic database as a tool for evaluation or screening process. For example, data sponsor dossier and electronic data submission, the national registration database to consider the re-evaluation of pesticides, particularly those unsupported compounds without public health concern, can be digitalized. *Category : SUBSTANTIVE*	
USA JMPR has developed extensive guidance documents on the preparation of dossiers and supporting data for evaluation by the FAO and WHO panels of JMPR. While the guidance documents outline requirements related to data formatting and organization of pesticide residue and toxicological information, there may be further opportunity to standardize the submission of data files that are submitted to JMPR for evaluation. For example, are there data submission software tools and data reporting standards that can be used to harmonize data across different sponsors? Harmonization of data submission across sponsors could potentially improve the efficiency of the evaluation process because JMPR reviewers could evaluate supporting data in a single format when performing analysis and summarizing relevant information. A potential area of interest that could be explored further is whether a standardized submission format could be developed for field residue trial data. Other areas of interest could be identified by JMPR and discussed with sponsors to determine the feasibility of developing tools to further standardize the reporting and submission of data. *Category : SUBSTANTIVE*	
CropLife International Data sponsors have made progress to provide quality dossiers. CropLife International wants to point out that data sponsors seek yearly feedback on how they can further improve the dossiers to facilitate the work for the experts at JMPR. Periodic workshops to develop and implement improved digital templates and tools will be welcomed going forward. Furthermore, IT tools need to be modernized to accept full dossiers as electronic submissions and study data in structured form. For example: FAO requested in its manual for the submission of residue data from 2016 the submission of residue data on spreadsheets. Several templates have been developed and presented by Sponsors, but to date there is no agreed solution. As a major step forward FAO/WHO should establish relational databases with interfaces for upload of (structured) information provided by sponsors; utilizing electronic submissions by adopting OECD recommended formatting and naming conventions for study reports would also add efficiencies to the process. *Category : SUBSTANTIVE*	
2.1.2 CCPR Processes and Procedures	
Australia Extra resources could be put towards updating the pesticide MRL database in a timely manner following adoption by Codex. Countries rely on this database as the source of truth for CXLs, so maintaining its currency should facilitate trade *Category : SUBSTANTIVE*	

Text	Comment
Canada o Canada is of the opinion that the CCPR processes and procedures are relatively efficient, especially considering the scheduling of pre-meetings for various eWGs, ahead of the plenary, where several concerns raised by member countries are resolved, allowing a more focused discussion during the plenary. o In recent years, the MRL discussions have taken up significantly less time during plenary. However, the delays in reaching a consensus on some compounds appear to be due to the interventions from non-members (observer status) raising concerns that are not always scientifically-based and validated. While the CCPR Chair and secretariat have been very respectful and diplomatic in addressing these interventions, CCPR is encouraged to explore opportunities to limit such interventions from observers, used predominantly to show case their organization. *Category : SUBSTANTIVE*	
Colombia Actualmente los LMR fijados por la unión europea pueden considerarse como un referente mundial para el comercio de productos agrícolas. Por parte de Codex podría llegar a considerarse el buscar y acoger valores LMR para moléculas aun no estudiadas, siempre que los mismos provengan de resultados determinados con base en pruebas técnico científicas aportados por unión europea y puedan ser considerados como técnicamente viables y no restrictivos para el libre comercio por el comité del codex; esto de manera provisional hasta que las respectivas pruebas técnicas para los productos y moléculas probados para determinación de LMR – Codex sean avaladas y acogidas pasando todos los tramites de rigor. *Category : SUBSTANTIVE*	
Kenya Position: Kenya proposes that the JMPR clearly describe the principles followed in its scientific risk assessments and ensure that issues that relate to risk assessment policy are referred to the CCPR. The CCPR reports shall explicitly state such policies in sufficient detail to ensure that the national governments and JMPR can apply them in their evaluations. Rationale: This shall promote effective communication on risk assessment processes and procedures between CCPR and JMPR. *Category : SUBSTANTIVE*	
Thailand An approach to enhance CCPR process is to extend the duration of periodic review specified in the Codex Procedural Manual, especially for the non-toxic pesticide of which the national registration exists. If GAPs for pesticide uses remain unchanged, CXLs are able to be retained. *Category : SUBSTANTIVE*	
USA CCPR is responsible for establishing the schedule and priority list for JMPR and has more limited ability to improve the efficiency of the evaluation process and increase JMPR's evaluation capacity. In the past, CCPR has also helped support extraordinary meetings of JMPR and 2019 and 2021. Extraordinary meetings can help increase the review capacity of JMPR in short-term instances; however, increasing the frequency of meetings also places additional burden on JMPR evaluators and will not increase JMPR's overall capacity if there is not an increase in the number of trained JMPR experts who are available to participate. *Category : SUBSTANTIVE*	
CropLife International Workload for periodic reviews: CropLife International sees opportunities for improvement particularly for the resource intensive and data rich dossiers for periodic reviews of Codex MRLs. As a matter of fact, the number of substances that are scheduled for periodic reviews is building up. Since the resources of JMPR are limited, the list of periodic review substances are leading to a growing list of 'reserve compounds' for new substances. That is an unsatisfactory development from a sponsor's point of view. Sponsors need to prioritize the preparation of dossiers which were postponed. For the next JMPR, the dossier for a rescheduled periodic review needs to be updated with new information that has become available, to avoid inconsistencies between data submitted to JMPR and national authorities. Where new data become available, a clear procedure for submission is needed from CCPR to add these data, due to the fact that they no longer show-up on the schedule. *Category : SUBSTANTIVE*	

Text	Comment
2.1.3 JMPR Evaluation Process and Procedures	
Australia Typically when a complete data package is submitted and no issues are identified, the JMPR manages to complete assessments of compounds within a 12 month timeframe. Data packages are usually submitted in the 4th quarter of the year prior to the JMPR Meeting. These data packages are assessed and recommendations made and published in the month following, usually in October. That is significantly faster than many national authorities. Ensuring that the JMPR evaluator has a complete dataset, by a set cut off date, may help facilitate a more efficient JMPR evaluation. An effective mechanism for JMPR conducing preliminary checks of submission quality may be beneficial. The current approach is for the JMPR toxicology and residue evaluations to be conducted at the same time, but the completion of a draft toxicology monographs the year before the residue's evaluation is undertaken may allow for more efficiencies for the residues evaluation particularly with regard to the residue definition determination and dietary exposure assessments. This however may require clear identification of potential food and feed metabolites to the JMPR toxicology evaluator by the sponsor and a potential need for the toxicology monograph to be revisited when the residues monograph has been drafted. The effective use of virtual meetings and more extensive peer review should be continued with the aim of resolving possible issues in advance of the face-to-face meeting. *Category : SUBSTANTIVE*	
Canada o For new compounds, periodic reviews, and new uses where new toxicology data is submitted to WHO, consideration should be given to having WHO complete their evaluation one year prior to FAO conducting their evaluation. Having the Health Based Guidance Values (HBGVs) and toxicology assessment of the metabolites well ahead of the FAO evaluation could reduce the amount of time spent during the Meeting conducting the risk assessment. Currently, FAO receives the WHO assessment on the metabolites days before the end of the Meeting, creating significant but unnecessary stress and anxiety. o Virtual meetings: ☐ Although virtual meetings cannot replace in-person meetings, they could be a mechanism for potentially increasing the number of approvals for smaller and less complex evaluations (e.g. new uses). Virtual meetings cost less to host than in-person meetings and generally require less planning (i.e. no need to book hotels and flights). However, the challenge with virtual meetings is the differing time zones. ☐ In recent years, FAO has held a few virtual pre-meetings leading up to the September meeting, with members grouped according to time zones, to go through as many identified issues before the Meeting. However, as these pre-meetings do not involve all FAO experts, consensus can only be reached during the Meeting, where occasionally differing scientific opinions are raised and experts are required to revisit/re-assess decisions previously reached in the pre-meetings o JMPR Sharepoint: ☐ FAO created a sharepoint to share information, provide updates, exchange reviews, which has been extremely useful. ☐ All FAO experts have the opportunity to peer-review the reviews on the sharepoint, ahead of the Meeting, which would facilitate and expedite discussions during the Meeting. However, most FAO experts are so busy with their day-to-day jobs, reviewing/completing their own compounds (on their own time), there is very little time for the entire panel to peer-review the reviews available on the sharepoint ahead of the September meeting. *Category : SUBSTANTIVE*	
Kenya Position: Kenya proposes that quality assurance criteria is set for the data submitted to JMPR for review and evaluation and FAO and WHO explore the practical considerations associated with undertaking some of the work of the JMPR on an inter-sessional basis. Rationale: This will enhance the credibility of the data and the monographs while the inter-sessional meetings are likely to reduce the workload. *Category : SUBSTANTIVE*	

Text	Comment
New Zealand • Does JMPR undertake a pre-assessment of the Data Sponsor Dossier before assessment is undertaken. If not, then this could be an opportunity to filter out incomplete dossiers before they enter the assessment process. They then go to the back of the queue. Depending on the process, there could be backup submissions to replace those submissions rejected at the pre-assessment. • Where additional uses are made for existing compounds, when the compound is due for a periodic evaluations, what is JMPR position on assessment of such data eg less than 5 years from when the periodic evaluation commences. • JMPR monographs need to be transparent and sufficient for a third party to determine how JMPR reached its conclusions and recommendations. The key challenge is how much is too much and how little is too little. Therefore, is the balance between these two correct for current monographs? Should it be considered they are 'over engineered' then they could be reduced saving time for assessors and allowing them to assess more submissions. *Category : SUBSTANTIVE*	
New Zealand • Is it possible to extend out the period for period evaluations such as 20 years. This will reduce the number of periodic evaluations over time *Category : TECHNICAL*	
Thailand We support synergies between JMPR and other EWGs under CCPR to eliminate the backlog of evaluations and meet the future demand of establishing codex maximum residue limits for pesticides. *Category : SUBSTANTIVE*	
CropLife International CropLife International believes that the main bottle neck are the capacity and limited number of experts rather than the processes and procedures within JMPR. However, CropLife International asks the CCPR to consider the following concrete proposals: • JMPR should continue to work face-to-face complemented by virtual meetings. • CropLife International suggests to provide the opportunity for pre-submission meetings between the data sponsors and the expert evaluators. • There should be an opportunity for the data sponsor to respond to concerns during the JMPR. This could reduce the number of MRLs that cannot be set because of "missing" data, or misalignment between tox and environment evaluations. Regarding scientific procedures, where data requirements change, following discussions in JMPR or other expert consultations, FAO/WHO are asked to better explain the rationale for this change and invite public comments before implementation. Changes in requirements should be published on-line as amendments to existing guidance, and not requested on an ad hoc basis during evaluations. FAO and WHO should increase their efforts to ensure that all decisions are taken consistently in line with published guidance. Revision of evaluations after the JMPR leads almost unavoidably to a one year delay in progressing a standard. FAO and WHO are asked to implement procedural changes so that, where necessary, JMPR opinions can be revised prior to the next CCPR meeting. In case of concerns, a peer review by different experts as a second opinion is suggested. *Category : SUBSTANTIVE*	
2.1.4 JMPR Organizational Structure, Staffing and Resources	
Australia It is considered that recruiting and training new expertise and retaining existing JMPR expertise is of critical importance. JMPR training sessions for potential new toxicology and residues evaluators may help recruit new experts but additional initiatives to attract and retain experts may be needed. Retaining existing expertise to help train new additions and to complete the more complex evaluations in the short-term is of great importance but care should be taken to not over-burden experienced experts. JMPR experts can spend considerable amounts of their own time preparing JMPR monographs and it has been suggested that a cap on the number of hours JMPR experts can individually spend on monograph preparations prior to the meeting may help attract and retain experts.	

Text	Comment
Another option for increasing the JMPR expert capacity that should be explored is for the FAO and WHO to employ full-time JMPR evaluators, or second staff on a semi-permanent basis, to draft a certain number of monographs per year. This would assist with providing monographs to the meeting, however it should be noted that there still may be challenges within the current format for enough 'face-to-face' time for discussion of issues. A clear process for peer review for these reports would be required, which may still rely on the resources of the JMPR experts. JMPR meetings are typically held in Rome or Geneva, but more flexibility in terms of meeting locations may be attractive to JMPR experts, particularly for those based outside of Europe. *Category : SUBSTANTIVE*	
Canada See question 1. *Category : SUBSTANTIVE*	
Kenya Position: Kenya notes that developing countries have financial limitations and therefore recommends that FAO and WHO explore the possibility of securing additional funds from donors e.g., Crop Life International to allow the better resourcing of the JMPR. Rationale: Additional funding shall improve efficiency and increase output. *Category : SUBSTANTIVE*	
New Zealand • Funding is one of the key constraints. If JMPR could employ more staff and pay assessors this would assist. *Category : TECHNICAL*	
Singapore Since the shortage of JMPR experts to carry out the evaluation of toxicological and residues dossiers submitted by the agrochemical industry and member countries has been identified as a key contributing factor behind the built-up of the backlog, Singapore would like to suggest that CCPR and JMPR shall jointly explore the possibilities and approaches for enrolling more JMPR expert from Member Countries. Equally important is to recruit and train up promising young officers with good scientific qualification and technical experience in the critical domain areas through capacity building and mentorship programme. *Category : SUBSTANTIVE*	
Thailand More experts are needed to expand the capacity of the JMPR panels. *Category : SUBSTANTIVE*	
USA The United States would like to call attention to the previous 2002 review of the working procedures of JMPR: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf. This report found that "both the FAO and WHO are severely limited in the financial resources that they can make available for the work of the JMPR due to competing demands on their respective budgets." In addition, the 2002 report found that participation of JMPR experts is done on a voluntary basis and requires the support of national regulatory authorities. National authorities may be resistant to allowing their experts to work on JMPR. Given these constraints in resources and staffing, it may be more promising to consider other opportunities that increase the efficiency of the existing evaluation process or re-evaluate the JMPR evaluation model. *Category : SUBSTANTIVE*	

Text	Comment
CropLife International CropLife International believes that the FAO/WHO joint secretariats need additional staff, but CropLife International is not in a position to quantify that demand. For matters requiring a high degree of specialization, FAO and WHO are asked to add experts to their panels representing multiple geographical regions, including from underrepresented ones. *Category : SUBSTANTIVE*	
2.1.5 Other Areas of Enhancement	
Australia Not at this time. *Category : SUBSTANTIVE*	
Canada Canada has not other recommendations for areas of enhancement. *Category : SUBSTANTIVE*	
2.2 Opportunities for Major Reform	
Egypt Capacity building activities to strengthen capabilities of Codex members to satisfy requirements for JMPR evaluations *Category : SUBSTANTIVE*	
2.2.1 Use of National Reviews and Data	
Australia It is unclear what is being proposed by use of national reviews and data. The data packages provided to the JMPR often represent data from several countries. Following review of the data and the regulatory approvals in place at the time of the JMPR assessment, the critical GAP is decided upon the supporting data used to make a maximum residue limit recommendation. If the proposal is for JMPR to use national reviews of data and the related risk assessment, it is considered that there are pros and cons associated with the potential use of national reviews. There may be efficiencies in terms of monograph preparation if a national review could be used by the JMPR evaluator, for example to produce tables of residue trial results. The Australian Pesticides and Veterinary medicines Authority has an established process for considering international assessments to inform its regulatory decision, but it does not simply adopt the conclusions of that international assessment. If national reviews were to be used by the JMPR, a process will need to be determined to maintain the independence (both perceived and actual) of the JMPR and ensure that the decisions made by the JMPR are consistent with the JMPRs risk assessment framework. The concept of JMPR joint reviews with a national regulator has been discussed recently, but to date lacks any real drive. *Category : SUBSTANTIVE*	
Canada o National Reviews often differ from one authority to another due to different science policies and legislative requirements and in many cases because manufacturers often submit different data to each authority. All national reviews have their merits, therefore, it is questionable how JMPR will determine which national review it will rely on. Furthermore, the format and templates used to review toxicology and residue chemistry data are different among the various authorities. If all authorities and JMPR can agree to one standard template/format, perhaps the individual national reviews (excluding decisions) or summaries of each scientific study can be relied upon by JMPR, precluding JMPR experts from recreating tables and entering data. *Category : SUBSTANTIVE*	

Text	Comment
Kenya Position: Kenya recommends the use of National and/or Regional Scientific Data for Risk Assessment by JMPR. Rationale: The use of these national or regional summaries of data by the JMPR would result in substantial time savings, while allowing the JMPR to concentrate on international risk assessment. *Category : SUBSTANTIVE*	
New Zealand • In principle this is something that should be explored. It assumes there are national reviews completed when JMPR assesses the compound. Another consideration does there need to be criteria on what is considered an acceptable national review. *Category : TECHNICAL*	
Thailand We are of the view that there is an opportunity to use the national reviews for JMPR's evaluation. However, the capacity building is also needed to strengthen capabilities of Codex members to fulfil the requirements for JMPR evaluations. Furthermore, the details of each stage of the national review procedure should be thoroughly provided. *Category : SUBSTANTIVE*	
USA Given that it may be difficult to change the availability of JMPR resources and staffing, one potential area of opportunity is the use of national-level reviews by JMPR. The relates to current work by CCPR to enable the participation of JMPR in the global joint review of new compounds. The use of national reviews of data was considered in the 2002 review of the working procedures of JMPR and may be helpful to re-evaluate based on advancements by the Organization for Economic Cooperation and Development and regional approaches that may be able to be further leveraged by JMPR. *Category : SUBSTANTIVE*	
CropLife International CropLife International supports that experts consider national reviews in their evaluations. The submission of national reviews to initiate JMPR reviews has been requested by FAO for a long time. These national reviews could be submitted by national authorities in response to the Circular Letters, where all stakeholders are invited to submit relevant information. Therefore, especially the owners/publishers of those reviews should be encouraged to submit this information. Codex could also develop a system of all new national MRL reviews. For periodic reviews of existing MRLs, Codex could refer to private global databases (e.g. Homologa) that can be leveraged as they have tracked global MRL and labels for more than two decades. *Category : SUBSTANTIVE*	
2.2.2 Alternative Peer Review Models	
Australia The virtual meetings held during the pandemic shutdowns highlighted the importance of face-to-face meetings to enable full engagement in discussions of complex issues over a number of days. Particularly given the variety of time zones involved. As a result, for anything other than relatively simple decisions, face-to-face meetings are essential. *Category : SUBSTANTIVE*	
Canada o Alternative peer review models would certainly alleviate the JMPR workload, however, any organization/authority designated as peer-review would need a sound knowledge of residue chemistry data, the Codex Risk Analysis Principles, the JMPR science policies (FAO Manual) and historical JMPR decisions to ensure consistency and accountability. *Category : SUBSTANTIVE*	

Text	Comment
Kenya Position: Kenya supports the use of Alternative Peer Review Models for the future operation of the JMPR using a criterion set by CCPR. Rationale: Once the criterion is set by CCPR, it shall promote transparency. *Category : SUBSTANTIVE*	
New Zealand • Is the current Peer Review model fit for purpose? Similar to the comment above, is it too extensive or light, or just right. It is not clear what criteria are used for peer review process or the number of persons involved in the peer review process. These could be reviewed as to whether they are still fit for purpose. *Category : TECHNICAL*	
Thailand We consider that the alternative peer review model may be beneficial for new compound evaluations. The outcome arising from alternative peer review between JMPR and member countries should be further discussed to obtain more information on this issue. *Category : SUBSTANTIVE*	
CropLife International In order to facilitate the use of national reviews, we encourage the involvement of JMPR experts as observers. Procedurally, JMPR gets involved after a pesticide has been authorized in at least one Codex member state, as a condition for scheduling. For substances that have been nominated, by change of procedures, JMPR experts could be invited as observers to meetings of authorities when decisions are taken on relevant topics, for example the definition of the residue(s), Definition of Residues and HBGVs, MRLs. This could help to minimize differences between JMPR and national evaluations and to identify data gaps which could be closed prior to information submission to the JMPR. The independency of JMPR Reviewers' conclusions is ensured by the specific JMPR criteria they apply to a dataset summarized by a national review agency. *Category : SUBSTANTIVE*	
2.2.3 Other Areas of Reform	
Canada o Canada has no other recommendations at this time. *Category : SUBSTANTIVE*	
New Zealand • Should the scope of commodities that can have a MRL established be revisited (for example animal feed commodities). If this is reduced then this would reduce the number of submissions and hence the workload for JMPR assessors. • Where a Codex MRL has been established for a new compound, could a default MRL (such as 0.01mg/kg) be also established if there is no dietary exposure concerns. This would assistance by both reducing trade irritants and potentially reducing the number of MRL submissions. *Category : SUBSTANTIVE*	
CropLife International In a fast evolving world, CropLife International wonders whether annual decision making in Codex still meets current demands of Codex members. CropLife International suggests establishing a permanently existing JMPR working on scheduled submissions as a more appropriate solution to provide scientific advice. In addition, as already mentioned above, providing early advice to the CCPR on the schedule of existing chemistry for periodic re-evaluation could be an important contribution to reduce workload in JMPR and CCPR. In order to move to a continuously working Codex system, a second virtual CCPR meeting could be established in addition to the annual meeting of CCPR. This additional virtual CCPR could exclusively decide CXLs while the face-to-face CCPR meeting manages CXLs and all other CCPR matters (e.g. eWGs). In order to leverage the efficiencies gained at CCPR, the CAC should adopt the proposed CXLs through a written procedure in addition to adopting CXLs at the face-to-face CAC meeting.	

Text	Comment

In addition, the Codex secretariat is asked to update the online CODEX MRL database shortly after the CAC meeting, ideally within 90 days, to reflect the most recent decisions and allow for practical search for CXLs by food value chain partners and competent authorities.

Category : SUBSTANTIVE

***Question 3**: For the opportunities you have identified, please comment on the anticipated challenges and propose possible solutions that may be implemented by CCPR and JMPR. This may include challenges related to resources, process and procedures, and governance.*

Australia

For the identified opportunities related to resources, obtaining more funding may be required.

It is expected that the challenge of resourcing will be ongoing. In addition, there is the real possibility that we could see a situation develop in which it will be difficult to gain new volunteers with the requisite expertise nominating to participate in the JMPR.

It is considered that the use of national monographs may pose certain challenges with the perception of independence of the evaluation process, as well as requiring permission to be obtained not only from the sponsor but from the national authority for the use of the document.

Category : SUBSTANTIVE

Canada

- ANTICIPATED CHALLENGES:
  - As noted above, recruiting more JMPR experts is very difficult and resource-intensive. Regulatory authorities are not always able to send more than 1-2 experts to JMPR or allocate time during their work hours to conduct JMPR review due to priorities of the national authority. In addition, experts are volunteers and are not compensated for the amount of time spent working on the evaluations. In addition, although the in-person meetings give experts the opportunity to travel, there is very little recreational time for them to enjoy the cities. FAO experts only get one day off (over an almost 3 week meeting) and work late hours. There is a lack of incentive to become an expert.
  - Even if the JMPR hired a dedicated group of experts to conduct evaluations, as mentioned above, all these evaluations would need to be peer-reviewed by the individual Panels during the Meeting, which would take a considerable amount of time.
  - Experts already find it challenging to meet once a year. Many would not agree to a second yearly meeting.
- POSSIBLE SOLUTIONS:
  - Mentioned above: improved sponsor dossiers, WHO evaluation the year prior to FAO, better use of virtual meetings and standardized review templates.

Category : SUBSTANTIVE

Colombia

Como se mencionó anteriormente, una idea para impulsar una mayor capacidad operativa puede ser el destinar estímulos como: certificados, cartas de reconocimiento, acceso e invitaciones a cursos de capacitación a los profesionales que generen aportes en las revisiones y grupos de trabajo

Category : SUBSTANTIVE

Costa Rica

En relación a la claridad y calidad de los expedientes enviados por el patrocinador se podría proponer establecer un paso preliminar donde se involucre una etapa de admisibilidad de la documentación para que previo al traslado a los expertos se determine si el expediente está completo y cumple con la información necesaria para que la JMPR pueda realizar la evaluación correspondiente;, en esta etapa, las autoridades nacionales podrían colaborar en esta labor para que no se recargue el trabajo en la JMPR. Así mismo, se podría establecer la elaboración de guías claras, para los que generan la información, de esta forma se podría contar con información de calidad.

Category : SUBSTANTIVE

Egypt

- JMPR Organizational Structure, Staffing and Resources

Challenge:

Text	Comment
The lack of necessary resources & experts to carry out the committee tasks. Proposed solutions: Providing different resources methods and sufficient financial/funding support for the regular convening of the committee through proposing annual fees to be paid by Industry/trading companies Also, Expanding the database of experts participating in the various fields of work of JMPR (to be divided into smaller groups & chaired by an expert from the current JMPR experts for each group to be responsible for the evaluation of certain compounds). - Capacity building activities to strengthen capabilities of Codex members to satisfy requirements for JMPR evaluations Challenge: The lack of the capabilities of some Codex members. Proposed solutions: Provide capacity building activities to promote the improvement of human resources for those Codex members with difficulties in carrying out the necessary technical studies. These would include technical support to meet the requirements of studies and to meet formal procedures for the data submission. Ideally, these activities could be directed towards experts from different sectors within government and/or research institutes. Some activities proposed to carry out capacity building on: - Field trials (residues) - Toxicological studies - Data submission within periodic review procedures *Category : SUBSTANTIVE*	
India Comments: Kindly refer to the comments at Q1, Q2 (2.1) comments for major reforms and Q2 (2.2) *Category : TECHNICAL*	
Kenya 1. Securing additional funding for JMPR work. Challenge: There is the risk of conflict of interest and limited confidence that an accelerated procedure would influence the desired outcome. Possible Solutions: Have an acceptable set criterion, diversify donor support/funding. *Category : SUBSTANTIVE*	
New Zealand • The key challenges are funding and availability of persons with the appropriate expertise to be JMPR. In theory having a pool of full time assessors would allow timely assessment of submissions. *Category : TECHNICAL*	
Thailand As the increasing needs in resources have long been described, Thailand would like to support the sustainable use of the resources to respond to the anticipated demand for evaluations on new active ingredients, new uses, and re-evaluations. For example, training and capacity building should be conducted to increase number of competent personnel, which will benefit the JMPR's work, as well as the major reform through the use of national reviews or alternative peer reviews model should be done. In addition, when the priority list of pesticides for evaluation by JMPR is annually established, several unsupported compounds are listed. In managing those unsupported compounds for periodic review, the national registration database can be utilized. In case those pesticides are registered for use in a member country, JMPR should review updated information of GAPs. If GAPs for pesticide uses remain unchanged, CXLs are able to be retained. The member countries, where registration exist, are thus requested to provide GAPs information for the JMPR review. *Category : SUBSTANTIVE*	

Text	Comment
USA Opportunities for Enhancement: • Data Sponsor Dossier and Electronic Data Submission: Development of software and tools to enable more standardized data reporting may require extensive collaboration with stakeholders. Depending on the type of data being considered, there may be reasons that data reporting cannot be fully standardizes, which would limit the ability to create software and other data tools. • CCPR Processes and Procedures: As indicated, CCPR is likely to have more limited ability to increase the evaluation of capacity of JMPR. Extraordinary meetings may help address temporary workload issues, but are unlikely to be a sustainable solution for increasing JMPR's capacity. • JMPR Organizational Structure, Staffing and Resources: As indicated, there may be limited ability to increase JMPR resources, staffing, and the availability of experts. It may be more promising to consider other opportunities that increase the efficiency of the existing evaluation process or re-evaluate the JMPR evaluation model more broadly. Opportunities for Major Reform • Use of National Reviews and Data: Use of national reviews and data by JMPR must be balanced with the need to maintain JMPR as an independent, international scientific advisory panel. This is a core element of JMPR so clear working procedures would have to be developed to maintain its ability to independently evaluate pesticides when making MRL recommendations. *Category : SUBSTANTIVE*	
CropLife International The foreseeable challenges and potential solutions have been outlined in CropLife International's responses to the questions above. *Category : SUBSTANTIVE*	
Question 4: *Codex members and observers are requested to provide feedback on the focus of additional stakeholder workshops that aim to expand upon the virtual stakeholder workshop sponsored by CropLife International on March 31, 2022 and summarized in CX/PR 22/53/20[2]. Please provide recommendations on key topics and themes for this follow-up workshop.*	
Australia If an additional stakeholder workshop on this topic is organised, Australian representatives would like to be involved. *Category : SUBSTANTIVE*	
Canada As noted at the March 31, 2022 workshop, the challenges noted herein are likely similar to those experienced by other Codex Committees, not only CCPR. Perhaps there is merit in engaging other Codex Committees to share experiences, exchange ideas and collectively brainstorm on how to make the process more efficient across Codex. *Category : SUBSTANTIVE*	
Egypt Egypt suggests the following topic; Pesticide residue risk assessment and Maximum Residue Levels (MRLs) setting *Category : SUBSTANTIVE*	
European Union The EU is of the view that to enhance the capacity of JMPR, some major procedural and structural changes will be necessary and should be seriously considered. While little improvements can be made immediately this will not address the structural problems arising from the fact that the JMPR is not a permanent structure supported by permanent staff. If a future workshop is organised, it should primarily focus on how to achieve major structural changes for the future´, e.g.by developing a roadmap for such a change. *Category : SUBSTANTIVE*	

Text	Comment
Kenya Position: Kenya agrees with the recommendations made in enhancing operational procedures of JMPR and CCPR to eliminate the backlog of evaluations and meet the future demand of establishing codex maximum residue limits for pesticides, CX/PR 22/53/20. Rationale: Considering the backlog it's important to enhance the technical and operational procedures of JMPR and CCPR with evidence that the current system is unable to keep up with the demand for evaluations on new active ingredients, new uses, and periodic re-evaluations. *Category : SUBSTANTIVE*	
USA The United States believes that future deliberation could benefit by discussing the previous 2002 review of the working procedures of JMPR. In particular, it would be helpful to identify key findings and recommendations that are relevant to current discussion on JMPR's review capacity. It would also be helpful for the follow-up workshop to include participation from a range of stakeholders in the evaluation process, including Codex Members, Observer Organizations, JMPR experts, and FAO/WHO. This will enable engagement of stakeholders and also ensure the viewpoints of JMPR experts that have the greatest understanding of the current process are represented. *Category : SUBSTANTIVE*	
CropLife International CropLife International proposes to divide topics for a future workshop into three areas: Communication: For example: • Ways of working • Exchange with data sponsors • IT Infrastructure Provision of Scientific Advice: For example: • Overcome capacity constraints • More meetings, permanent 'JMPR'. • Practicability of inviting JMPR experts to expert meetings of governments. CCPR(CAC): • Procedural changes in CCPR • bi-annual meetings (one f2f, one virtual, written procedures) • procedural changes in CAC *Category : SUBSTANTIVE*	
GAFTA Gafta fully supports the focus on how to improve operations procedures so Codex is more effective. However, from a trade perspective, we would like to discuss how to encourage more countries to use international standards which would encourage alignment and facilitate trade. The importance of MRLs set on sound science is also key to this discussion and to setting reliable policy. Further discussion on how to promote more MRLs set on crop groupings for minor crops is considered important for our membership. *Category : SUBSTANTIVE*	
***Question 5**: Do you have any further proposals or recommendation that are not covered by the four previous questions?*	
Australia Not at this time. *Category : SUBSTANTIVE*	

Text	Comment
Canada Canada has no other recommendations at this time. *Category : SUBSTANTIVE*	
Egypt Egypt suggests establish & creating an online training awareness session related to JMPR work and procedures, to be published on the proposed JMPR platform. *Category : SUBSTANTIVE*	
European Union The current situation is caused by high customer demands, limited financial resources, limited work power and slow administrational procedures. Therefore, the feasibility of the of whole process in terms of available capacities, efficiency and restricting bottlenecks should be assessed and where possible improvements should be proposed. *Category : SUBSTANTIVE*	
Kenya 1. The need to increase the number of meetings to allow for establishment of more Codex MRLs. 2. Build capacity of experts in data collections, review, and evaluation especially in developing countries that will enhance in National and regional reviews as a way of broadening the resources of JMPR 3. Increase sustainable funding of the FAO, WHO to support the work of CCPR and JMPR. 4. Explore the possibility of the Codex CXL setting process to be an ongoing process prior to the the annual meetings. 5. Kenya notes the low participation of Experts from developing countries in JMPR activities and CCPR meetings and therefore proposes for facilitation to enhance participation. 6. Considerations shall be given to geographical representation in capacity building of experts, data collection and wholistic participation in Codex CXL setting process. *Category : SUBSTANTIVE*	
New Zealand No *Category : EDITORIAL*	
CropLife International Budgetary matters: o Like FAO, WHO is asked to assign a permanent budget for the provision of scientific advice. While this matter cannot be resolved in CCPR or in the CAC, Codex members are requested to engage when budgets are discussed within the WHO. o FAO and WHO are asked to investigate how financial contributions from the private sector could be accepted to support the provision of scientific advice by JMPR and other scientific joint meetings or consultations while keeping FAO's and WHO's independence. o FAO and WHO are asked to invest more resources into permanent employees for the preparation of initial draft review documents for consideration by the JMPR expert panels. These additional resources could be created using additional funding from governments or via secondment of experts from governments for a 3-5 year period. Full-time reviewers for new compounds could also ensure more concurrent MRL setting with national MRL from countries where new compounds are registered first. o Use and implementation of Codex standards by members (Codex SDG Goal 3): the Codex secretariat is asked to regularly collect and publish updated information on progress of active adoption of CXLs by national governments and deferral policies for discussion in the CCPR and CAC meetings. *Category : SUBSTANTIVE*	

Text	Comment
GAFTA Gafta members trading agricultural bulk commodities all around the world are reliant on transparency of standards including MRLs which gives necessary predictability to operate. Gafta would encourage Codex or CCPR to publish changes to MRLs once fully adopted in Codex system. Experience has shown that it takes a very long time to publish new or revised MRLs on Codex website. We would appreciate if CCPR would consider a speedier publication on the Codex website as soon as possible after adoption by CAC. *Category : TECHNICAL*	

APPENDIX II

LIST OF PARTICIPANTS

Australia
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Australia
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