

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 3, 6, 7(a), 7(b), 7(c)

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ORIGINAL LANGUAGE

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

50<sup>th</sup> Session

Haikou, P.R. China, 9-14 April 2018

### NIGERIAN POSITION

#### **Agenda Item 3: Matters referred to the Committee by the Codex Alimentarius Commission and /or its subsidiary bodies. (CX/PR 18/50/2)**

**Position:** Nigeria would like to thank Chile for raising this important issue to the Commission for guidance, and welcomes further discussion on developing a guidance document to be presented to a suitable subsidiary body of the Commission.

This is in line with the spirit of the CCPR to harmonize divergent global approaches, and the Strategic Plan (2014-2019) Strategic objective 1.2 on identification of emerging issues.

Nigeria also looks forward to the discussion paper to be developed by Chile based on the recommendation by the CAC40.

#### **Rationale:**

Biopesticides, biofertilisers and biostimulants are emerging issues and so there is lack of internationally harmonized guidance on definitions and recommendations on these subjects. The lack of harmonized international guidelines might lead to future trade challenges due to divergent national legislation initiatives. This is especially due to the increasing use of these products to improve agricultural productivity. There is therefore the need for harmonized guidance on definitions and recommendations.

#### **1. Matters arising from the 73<sup>rd</sup> Session of the Executive Committee**

2. **Position:** Nigeria supports the proposal to have a back-to-back meeting in 2020 between the two committees to encourage closer collaboration in setting MRLs.

**Rationale:** This is to ensure that there are harmonized conclusions for compounds used as both Veterinary Drugs and Pesticide Residues.

#### **Agenda Item 6: Draft and proposed draft maximum residue limits for pesticides in food and feed at steps 7 and 4 (CX/PR 18/50/5)**

##### **1. 2, 4-D (020),**

#### **Issue:**

The herbicide, 2,4-D was scheduled for JMPR evaluation in the year 2017 for consideration of residues arising from a GM cotton crop. The Meeting received supervised trials data for 2,4-D on AAD-12 cotton.

#### **Position:**

Nigeria supports the recommendation by the JMPR not to set MRL for cotton crop.

#### **Rationale:**

Due to the questionable storage stability of both 2,4-D and 2,4-DCP in cotton seed, it was not possible for the 2017 Meeting to evaluate the trial data

##### **2. Difenoconazole (224),**

#### **Issue:**

Difenoconazole was scheduled for evaluation of additional use patterns by the 2017 JMPR. The 2017 Meeting received additional analytical methods, storage stability data for dried beans and oranges, processing data for rice, GAP information and residue trial data for uses on pome fruits (apples, pears), blueberries, strawberries, guava, dragon fruit, watermelon, chili peppers, sweet corn, pulses (beans, peas (except soya bean) and chickpeas), ginseng, globe artichoke, rice and coffee beans.

Farm animal feeding studies were evaluated by the 2017 Meeting in Pea vines and pea hay, Sweet corn forage and sweet corn fodder (stover) and Rice straw.

**Position:**

Nigeria supports the proposed MRLs for the following commodities (Pome fruits, Blueberries, Strawberries, Pitaya (dragon fruit), Watermelon. Group of Fruiting vegetables other than cucurbits (except Peppers, Chili), Chili, Peppers, Chili, dried, Sweet corn (Corn on the cob)(kernels plus cob with husk removed), Subgroup of dry beans (except soya bean), Subgroup of dry peas (includes all commodities in this subgroup), Ginseng, dried including red ginseng, Globe artichoke, Rice, Rice, polished, Rice straw and fodder, dry, Coffee beans and Sweet corn fodder).

**3. Fenpyroximate (193),**

**Issue:**

Fenpyroximate is a pyrazole non-systemic selective acaricide/insecticide. It was reviewed by the 2017 Meeting under the periodic review programme of Codex Committee on Pesticide Residues (CCPR). Supervised residue field trial and toxicological data were submitted to the JMPR in 2017 for evaluation for the following crops: citrus (oranges, mandarin, lemons, grapefruit, natsudaidai, tangor), pome fruit (apples, pears), stone fruit (cherries, peaches, apricot, plums), berries and other small fruits (grape, raspberries, strawberries), assorted tropical and subtropical fruits-inedible peel (avocado, papaya), cucurbits (cucumber, melon, courgette, watermelon, cantaloupe), fruit vegetables other than cucurbits (tomatoes, pepper), legume vegetables (beans), root and tuber vegetables (potatoes), cereal grain (maize), tree nuts (almond, pecan, walnut), hops, coffee and tea.

Farm animal feeding and dietary burdens studies were evaluated by the 2017 Meeting in tissues and milk of dairy cows.

**Position:**

Nigeria supports the proposed MRLs for the following commodities (Apple, Avocado, Pear, Subgroup of Cherries (includes all commodities in this subgroup), Apricot, Subgroup of Plums (including fresh prunes) (includes all commodities in this subgroup), Group of Citrus fruit (includes all commodities in this group) Grapes, Strawberries, Raspberry, Cucumber, Squash, summer, Melons, except watermelon, Watermelon, Subgroup of Peppers (except Martynia, Okra and Roselle), Subgroup of Eggplants (includes all commodities in this subgroup), Tomato, Cherry tomato, Subgroup of Beans with pods (includes all commodities in this subgroup), Potato, Maize, Tree nut, Coffee beans, Hops, dry, Tea, green, black, dried, Milks, Meat (from mammals other than marine mammals), Edible offal (mammalian), Mammalian fats (except milk fats), Apples, dried, Dried grapes (= Currants, Raisins and Sultanas), Citrus oil and Maize fodder. Nigeria therefore proposes that these draft MRLs be advanced to the next Codex step.

Nigeria does not support the establishment of MRLs for the following commodities; cherry, watermelon, peach, dried tomato and dried plums.

Nigeria supports the withdrawal of the MRLs for the following commodities: Fruiting vegetable other than cucurbits, Pome fruits, Prunes dry, Stone fruits, Common beans (pod and/or immature seeds and Peppers, Chili, dried.

**Rationale:**

The IEDIs in the seventeen cluster diet based on the estimated STMRs were 3-10% maximum ADI (0.015). The IESTI were less than 100% of a maximum ARfD for the commodities estimated, except for cherry (110% for children from Netherland and Denmark), peach (130% for children from Japan and Canada), watermelon (190% for children from Canada), dried tomato (310% the for general population from Australia), and dried plums (270% for children from Australia).

The 2017 Meeting concluded that the long-term dietary intake of residues of fenpyroximate is unlikely to present a public health concern, but the short-term intake of fenpyroximate residues from uses, considered may present a public health concern and therefore is likely to impede trade in the above commodities.

**4. Flonicamid (282),**

**Issue:**

Flonicamid is a systemic pyridine carboxamide insecticide. It was proposed by the 48<sup>th</sup> Session of the CCPR for the evaluation of additional new uses. The 2017 Meeting received new GAP information and supervised field trials on legume vegetables and pulses

**Position:**

Nigeria supports the proposed MRLs for the following commodities (Subgroup of Beans with pods (except soya bean (succulent seeds in pods), Subgroup of Peas with pods, Subgroup of Succulent beans without pods (except soya bean (succulent seeds), Subgroup of Succulent peas without pods, Subgroup of Dry beans (except soya bean (dry) and Subgroup of Dry peas).

Nigeria therefore proposes that these draft MRLs be advanced to the next Codex step.

**Rationale:**

The IEDIs in the seventeen cluster diet based on the estimated STMRs were 0-10% maximum ADI (0.07 mg/kg bw). The 2015 JMPR decided that an ARfD for flonicamid was unnecessary.

The low percentage of long dietary exposures to residues of flonicamid does not present any public health concern and therefore is unlikely to impede trade in the above commodities.

### 5. Propiconazole (160)

**Issue:**

Propiconazole was scheduled at the 48<sup>th</sup> Session of the CCPR (2016) for the evaluation of additional MRLs at the 2017 JMPR. Supervised residue field trials data were submitted to the JMPR in 2017 for evaluation of the following crops; citrus fruits, stone fruits and pineapple and pre-harvest treatment on tea.

**Position:**

Nigeria supports the proposed MRLs for the following commodities (Subgroup of Oranges, Sweet, Sour (including Orange-like hybrids), Subgroup of Mandarins (including Mandarin-like hybrids), Subgroup of Lemons and Limes (including Citron), Subgroup of Pummelo and Grapefruits (including Shaddock-like hybrids), Peach, Subgroup of Cherries (includes all commodities in this subgroup), Subgroup of Plum including Prunes) (includes all commodities in this subgroup), Pineapple and Orange oil).

Nigeria therefore proposes that, these draft MRLs be advanced to the next Codex step.

### 6. Tebuconazole (189)

**Issue:**

Tebuconazole, a triazole fungicide, was first evaluated by the JMPR in 1994 (T, R), and last evaluated for toxicology in 2010 and for residues in 2011 within the periodic review programme.

It was scheduled by the 48<sup>th</sup> Session of CCPR (2016) for evaluation by the 2017 JMPR for additional uses. The JMPR received data on supervised residue trials on beans with pod.

**Position:**

Nigeria supports the proposed e Subgroup MRL for Beans with pods (includes all commodities in this subgroup) and at the same time supports the withdrawal Common bean (pods and/or immature seeds).

Nigeria therefore supports the proposed draft MRL should advance to the next Step

**Rationale:**

The Meeting estimated a maximum residue level of 3 mg/kg, a STMR of 0.315 mg/kg and a HR of 1.9 mg/kg for tebuconazole in beans with pods as a sub-group, and replaced its previous MRL recommendation of 2 mg/kg for common beans (pods and/or immature seeds).

The International Estimated Daily Intakes (IEDIs) of tebuconazole from the 17 GEMS/Food cluster diets based on the STMRs were in the range 2–9% of the maximum ADI of 0.03mg/kg bw. The IESTI represented a maximum of 5% and 9% of the ARfD (0.3 mg/kg bw) for the general population and for children, respectively.

With the low percentage of ADI and ARfD, the long and short term dietary exposure to residues of tebuconazole is unlikely to pose any consumer health risk and impede trade in the above commodities

**Agenda Item 7a: Type 04: Nuts, Seeds and saps, Draft Group 022: Tree nuts (at Step 7), Draft Group 024: Seeds for beverages and sweets (at Step 7), Proposed draft Group 025: Tree Saps (at step 4) (CX/PR 18/50/6)**

**Position:**

Nigeria agrees with the proposed revised commodity group 025 for Tree sap under Type 04 Nuts, seeds and saps and supports the recommendation of the EWG to forward the revised type 04 with the corresponding table for representative commodities for final adoption by the 41 session of CAC.

**Rationale:**

The tree sap group was created because they did not belong to grass family, and to include this group in a renamed type 04 “nuts, seeds and saps” in view of the large difference in forms between saps and the other commodities included in the type.

The revision is therefore consistent with the decision of the 49<sup>th</sup> Session of CCPR to create a new Group 025 for tree saps and the proposals on examples of representative commodities for commodity groups for Type 04 under Agenda Item 7(e).

**Agenda Item 7 (b): Type05: Herbs and Spices: Draft Group 027: herbs 9at Step 7) and Draft group 028: Spices (at Step 7) (CX /PR 18/50/7)**

**Position:**

Nigeria supports the recommendation of the EWG to forward the revised Type 05 Herbs and spices and the corresponding Table on examples of representative commodities for commodity groups for this Type 05 for final adoption by 41 CAC.

**Rationale:**

The proposed revision by the EWG is consistent with the decision of the committee to include

- a commodity only in one group or subgroup to avoid confusion of having two different CXLs for the same commodity;
- the same commodity with different plant parts in different groups to allow consideration of plant parts when describing a commodity;
- cross-referencing where commodities (without a code number) can be listed in a group, but with reference to its primary classification;
- the words “sub-group of” to the description of all subgroups to prevent misinterpretation between subgroups and individual commodities that share the same group.

This will facilitate the establishment of MRLs for Herbs and spices and facilitate trade on these commodities most of which are minor crops

**Agenda Item 7 (c): Impact of the revised commodity groups and subgroups in type 03, type 04 and Type 05 on the Codex MRLs(CLXs) adopted by the Codex Alimentarius Commission (CX/PR 18/50/8)**

**Position:**

Nigeria supports the proposed changes for moving commodities within Type 03 from other groups i.e. Sweet corn (corn and the cob) Sweet corn (whole kernel) from the vegetable group to the cereal group to exclude both sweet corn from the new group CXL of cereals the, note, “excluding sweet corn” has to be added to code GC 0080 Group cereal grains and the code GC 0081 subgroup of cereal grains except pseudo cereals. At the same time the groups CXLs of the vegetable group and the sub group fruiting vegetables other than cucurbits has to be added to both sweet corns.

Similarly, for Type 04 (Nuts, Seeds and Saps,) Nigeria supports the proposal that the CXL of FT 0305 (Olives) can be taken over by SO 0305.

We also support under Type 05 commodities moving to herbs and spices from other groups i.e. Pepper leaves is moved from the leafy vegetable groups to the herbs and spices group. To exclude Pepper leaves from the new group CXLs of herbs and spices the note “excluding Pepper leaves” has to be added to the group code HH0092 herbs and the subgroup code HH 2095. The group CXL of the leafy vegetable must be added to the Pepper leaves.

Nigeria supports the existing CXLs for herbs HH0092 has to be an individual CXL to those commodities. Chives have to be excluded from the CXL of the new subgroup VA 2032 (Subgroup of Green Onion)

**Rationale:**

This is in line with the decision of the 49<sup>th</sup> Session of CCPR that specific CXLs of the old group CXL for the relocated commodity will keep its existing CXL and at the same time the commodity will be excluded from the new group CXLs. The exclusion of the CXL from the new group CXL will be done in the column notes. After evaluation by JMPR it may be appropriate to implement the CXL of the new sub group and withdrawal of the CXL of the old group.