

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4(a)

CRD 04

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

49th Session

Beijing, P.R. China, 24 - 29 April 2017

Comments on Agenda Item 4(a): Matters of interest arising from FAO and WHO, submitted by European Union, Ghana, Kenya, Uganda and African Union

European Union

Mixed Competence

European Union Vote

The European Union and its Member States (EUMS) would like to thank FAO and WHO for this document and submit comments as set out below.

Progress in the coordination of the agendas between JECFA and JMPR

Differences in methodology for risk assessment of veterinary medicinal products and pesticides residues can potentially lead to different CXLs for the same substance which may cause problems for the authorities in member countries which are responsible for enforcement. The EU therefore welcomes very much the initiative that FAO and WHO have taken to establish a joint JMPR/JECFA expert group to elaborate a realistic model to assess the dietary exposure to dual use compounds. The discussion on possible harmonisation should focus not only on the methodology for risk assessment (acute and chronic risk assessment), but also other aspects should be covered, such as the review of the matrices for which CXLs are established (e.g. meat/muscle, fat including or excluding skin), the residue definitions or the concept of fat solubility of residues (e.g. setting of CXLs for milk and/or milk fat). We agree that it is desirable that only one single toxicological dossier is submitted. Particular attention should be paid on the specification of the substances assessed (identity/purity/impurity profile), to ensure that toxicological reference values derived for pesticides are applicable to active substances used in veterinary medicinal products and vice versa.

Call for pesticide monitoring plans

The EU is in possession of a very comprehensive database on pesticides monitoring data collected over many years in the EU Member States and is ready to assist by making available these data for the ongoing activities of the FAO/WHO Scientific Advice, in particular the ongoing review of the IESTI equation and the model to assess compounds used as pesticides and veterinary medicinal products. It is noted that before sharing monitoring data, coding issues need to be solved to make the data of the EU monitoring compatible with the GEMS requirements. We are also ready to provide any other type of technical information or expert advice that may be needed to progress with the ongoing activities through the European Food Safety Authority (EFSA) or the European Medicines Agency (EMA).

Ghana

Matters of interest arising from FAO and WHO

Ghana supports the ongoing work and looks forward to the report when it is finally completed.

Kenya

Item: Progress in the coordination of the agendas between JECFA and JMPR and

Position:

Kenya appreciates the progress made in the coordination of the JECFA and JMPR to have a single physical meeting in October 2017 that aims at proposing realistic model (s) to assess the dietary exposure to compounds used both as pesticides and veterinary drugs.

Item: Call for pesticide monitoring plans

Kenya supports the call for provision of pesticide monitoring plans. Kenya notes that the call for monitoring plans will provide data to be used in the ongoing review of the International Estimate Short Term Intake (IESTI) equation acute risk and therefore hopes that the data submissions will be extensive with the participation of countries from the various regions and in particular developing countries. To ensure that the data submission is comprehensive, it should be continuous rather than limiting the call within a specific time deadline. Kenya hopes that data will be representative of the various Global Environmental Monitoring System (GEMS) Food Program.

Uganda**Call for monitoring plans**

Position: Uganda supports the call for pesticide monitoring plans from Codex member countries by WHO/FAO scientific body. We also note that for this process to be very fruitful the data collected should be comprehensive and most developing countries should be supported in providing such data.

Rationale: To better inform the current proposed revision of the IESTI equation, there is the need to collect representative monitoring data from different parts of the world.

African Union**Progress in the coordination of the agendas between JECFA and JMPR****Issue:**

There are compounds that are used both as pesticides and veterinary drugs. This has in some instances made it difficult for the setting of key health based guidance reference values; namely the Acute Reference Dose (ARfD) and the Acceptable Daily Intake (ADI).

Position:

AU thanks that international risk assessment bodies in considering this matter and note that the JECFA and JMPR have established an expert working group to elaborate and to propose realistic model (s) to assess the dietary exposure to compounds. AU looks forward to the outcome of the work.

Rationale:

When the new model is developed, it will help to reduce the burden of work and resources committed to such work, both for the sponsors and the WHO Secretariat.

Call for pesticide monitoring plans**Issue:**

JMPR has been performing evaluations of compounds and proposing MRLs based on dietary exposure models supported by supervised field residue trials. In order to evaluate the accuracy and the conservatism of these models, JMPR advised initiation of the collection of pesticide monitoring plans in 2017. This data is to be used to support the proposed review of the IESTI equation.

Position:

AU supports the proposal that urges all CODEX members to submit their pesticide residue plans. However, for this work to produce fruitful outcome there is the need for a comprehensive data submission of all the proposed parameters in the model and it should be geographically representative, especially all those stated in the GEMS food Cluster diets. AU recommends that this work should be continuous to encourage this comprehensive data submission and should not be limited to a one time "Call for data". AU further recommends that FAO/WHO should provide technical support especially to developing countries that do not have monitoring plans to enable them provide this information.

Rationale:

Considering the strict data quality requirements needed for JMPR risk assessment, there is the need to build the capacities of countries to enable them comply with data requirements. The data should be comprehensive to ensure critical information to be used in review of the IESTI equation are provided.