

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 4a, 5, 7a, 7b, 7c, 7d, 7e

CRD 12

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

49<sup>th</sup> Session

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

#### COMMENTS OF NIGERIA

#### AGENDA ITEM 4(a): Matters of interest arising from FAO and WHO CX/PR17/49/03

##### 2. (Call for pesticide monitoring plans)

###### Comment:

Nigeria commends JMPR for this work. Nigeria supports the collection of pesticide monitoring plans and the need for all Codex member states to submit the pesticide residue plans. However, for this work to produce a fruitful outcome there should be a comprehensive data submission of all the proposed parameters in the model and it should represent all regions, especially all those stated in the GEMS food Cluster diets. This work should be continuous to encourage this comprehensive data submission and should not be limited to a single call for data. Nigeria also proposes that WHO provides technical assistance to developing countries that do not have monitoring plans to provide this information.

###### Rationale:

The data should be comprehensive to ensure critical information to be used in review of the IESTI equation is provided.

#### AGENDA ITEM 5.1: Report on items of general consideration by 2016 JMPR (special meeting) 2016 May JMPR Report

##### 2. GENERAL CONSIDERATIONS

##### 2.1 GENERAL CONSIDERATIONS ON THE EVALUATION OF GENOTOXICITY STUDIES

###### Comment:

Nigeria commends JMPR for this work on evaluation of Pesticide residues. Nigeria supports the recommendation of JMPR that a guidance document be developed for the evaluation of genotoxicity studies, taking the experience gained from this meeting into account.

###### Rationale:

Guidance document will ensure consistency and transparency in evaluation studies of Pesticide residues.

#### AGENDA ITEM 5.2: Report on items of general consideration by 2016 JMPR (regular meeting) 2016 September JMPR Report Section 2

##### 2.1 Update on the revision of Principles and Methods for Risk Assessment of Chemicals in Food (EHC 240)

##### 2.1.1 Benchmark dose

###### Comment:

Nigeria commends JMPR for this work. Given the importance of using this tool in the evaluation of toxicological data, Nigeria agrees with the recommendation of JMPR that the EHC 240 should be updated to include the Benchmark dose Approach.

###### Rationale:

This will increase transparency in the evaluations and better characterize the point of departure (POD)

### **Section 2.1.3: Guidance on the use and interpretation of statistical evaluations and historical control data**

#### **Comment:**

Nigeria commends JMPR for this work. Nigeria agrees with the recommendation of JMPR that a joint JMPR /JECFA electronic working group be convened to consider possible amendments to EHC 240.

#### **Rationale:**

The outcome of the work of joint JMPR/JECFA Electronic Working Group will give more clarity on the use of some aspects of statistics and the use of historical control data in EHC 240.

### **AGENDA ITEM 7(a): Draft and proposed revision of the Classification of Food and Feed at steps 7 and 4: Vegetable commodity groups CX/PR 17/49/06**

#### **Comment:**

Nigeria commends the Electronic Working Group led by the United States and co-chaired by Netherlands on this draft document. Nigeria supports the advancement of the proposed crop groups for final adoption at the commission; the document now has inclusion of minor crops from African countries.

#### **Rationale:**

The vegetable crop grouping will assist the establishment of Maximum Residue Limits for minor crop uses and will facilitate trade in these commodities from the African Region.

### **AGENDA ITEM 7(b): Draft revision of the Classification of Food and Feed at Step 7: Selected commodity groups (Group 020 – Grasses of cereal grains) CL 2017/19 Rev\_PR**

#### **Comment:**

Nigeria thanks the EWG led by USA and co-chaired by Netherlands for the work done to refine the classification as proposed in Group 020 Grasses of Cereal Grain. Nigeria has also noted that concerns during the CCPR48 have now been incorporated in the current proposal specifically to have a separate commodity code for Baby corn (immature corn) *Zea mays L*, which has been incorporated in Sweet Corns, subgroup 020E. Also noted is the inclusion of the Sweet corn (Corn-on-the-cob) GC 0447 in the same subgroup. The subgroup should however have the confirmation that the commodities referred to in the subgroup are succulent, since this would have direct relevance to the residues found in these commodities – this could be included as a description of the subgroup.

#### **Rationale:**

The new proposal has taken into consideration of the proposal by the African group for inclusion of the requested crops in subgroup 20E. This will assist in the establishment of MRLs for minor crops in the commodity groups.

### **AGENDA ITEM 7(c): Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 021 - Grasses for sugars or syrup production) CL 2017/20-PR**

#### **Comment:**

Nigeria thanks the EWG led by USA and co-chaired by Netherlands for the work done to refine the classification.

Nigeria will like to propose that:

- i) Amend the name of the Group 021 to be “**Plants for sugar or syrup production**”.
- ii) Nigeria supports the proposed subgroup grasses for sugar or syrup production, but re-code the subgroup as 021A; which will include Sorghum or Sorghum, Sweet (stalk) and Sugarcane.
- iii) Include a new sub-group “**Sap-producing trees**” as Group 021B. This will include items such as maple trees; and provided a suitable commodity code. This would also require the revision of the “Portion of the commodity to which the MRL applies (and which is analyzed) to incorporate sap-producing trees.

**Rationale:**

The change of the name will include more commodities that are used in sugar and syrup production, which includes commodities that are traded internationally and may require maximum residue limits and not limited to grasses only.

**AGENDA ITEM 7(d): Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 024–Seeds for beverages and sweets) CL 2017/21-PR**

**Comment:**

Nigeria will like to propose the following:

- i) Amend the name of the Group 024 to be “**Plants for beverages and sweets**”.
- ii) Nigeria supports the proposed division into three (3) subgroups:
  - a. **024A Seeds for beverages and sweets;**
  - b. **024B leaves for beverages and sweets**  
(Include **peppermint, jasmine, rooibos and hibiscus**)
  - c. **024C flowers for beverages and sweets**  
(Include **chamomile**)

**Rationale:**

This will allow for the inclusion of all other commodities not only seeds for beverages and sweets. There are commodities that are proposed for included in this Group that are not seeds but are traded for beverages and sweets e.g. licorice, liquorice (*Glycyrrhizaglabra*). The change of the name will include more commodities that are used in plants used for beverages and sweets, which includes commodities that are traded internationally and may require maximum residue limits. These commodities are also crops of minor use.

Although the EWG has proposed that no commodity that has been included in other groups, such as Basil in Group 028A Herbs and Species, should be proposed in this group, we strongly propose that the herbs or spices that are specifically traded with intention of being consumed as beverages; it is proposed that such commodities should be included. However, if the proposal to include these commodities is not appropriate, then place a specific reference (notes) with an asterisk (\*) on the specific commodity in the Group 028 (Herbs and Spices) to indicate that the commodity could be traded as a beverage.

**AGENDA ITEM 7 (e): Proposed draft Tables - Examples of selection of representative commodities (vegetable and other commodity groups) (for inclusion in the Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides to commodity groups) at Step 4 CL 2017/22-PR**

**Comment:**

Nigeria commends the Electronic Working Group on the revision of the Classification chaired by the United States of America and co-chaired by the Netherlands for the work.

Nigeria agrees with the proposals for the representative crops for the following groups:

- Group 009: Bulb vegetables
- Group 010: Brassica vegetables except brassica leafy vegetables
- Group 11: Fruiting vegetables cucurbits
- Group 12: Fruiting vegetables other than cucurbits
- Group 13: Leafy vegetables including brassica leafy vegetables
- Group 14: Legume vegetables
- Group 15: Pulses
- Group 16: Root and tuber vegetables
- Group 17: Stalk and stem vegetables
- Group 18: Edible fungi
- Group 20: Cereal grains

However, Nigeria does not agree with the proposal made for **Group 021 Grasses for sugar production and grasses and other plants for syrup production** since more work needs to be done to amend the proposed Group in order to appropriately and effectively capture all candidate crops for the group.

**Rationale:**

In view of the proposals made from the Group 021, there is need for further consideration of the proposed crops to conclude on the representative crops.