

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 13

CX/PR 19/51/18

March 2019

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

51<sup>st</sup> Session

Macao SAR, P.R. China, 8-13 April 2019

### NATIONAL REGISTRATIONS OF PESTICIDES

(Based on information submitted in reply to CL 2017/50-PR)

(Prepared by the Electronic Working Group chaired by Germany co-chaired by Australia)

#### Background

1. Following discussion at the 48th Session of the Codex Committee on Pesticide Residues (CCPR48 – 2016), the Committee agreed to the preparation of a circular letter (CL) seeking information from Member countries regarding national registrations for all compounds on the CCPR Pesticide List. In addition, for each pesticide, the CL would ask Member countries to list commodities for which a registered use was in place. CCPR further agreed that this work would be carried within the framework of the Electronic Work Group (EWG) on Priorities chaired by Australia and co-chaired by Germany.<sup>1</sup>
2. The main objective of the exercise is documented evidence of national registrations and additionally to list commodities for which a registered use was in place. This will improve administration and management of the Priority Lists and Schedules. The exercise started with compounds listed in Tables 2A and 2B. Nevertheless, in CCPR48 it was announced that all compounds on the CCPR pesticide list should undergo the exercise to facilitate the main objective. A list of national registrations including registered uses in place may help decision making on compounds no longer supported.
3. Australia, with the assistance of Germany, prepared a spreadsheet (excel file) and asked Member countries to complete the spreadsheet with information relevant to the compounds listed at the time in Tables 2A and 2B of the CCPR Schedules and Priority Lists.
4. The outcome was presented and discussed during CCPR49 (2017). CCPR agreed that Australia and Germany would continue to work of the National Registration Database and that a CL should be issued seeking further input to the database. In addition, CCPR agreed that the CL would introduce further ideas on the management of the database and consider whether or not to broaden the scope of the database to include all compounds listed on the CCPR Pesticide List.<sup>2</sup>
5. By Circular Letter CL2018/17-PR (January 2018) Member Countries were asked to repeat the exercise from the previous session for 24 additional substances and more information on crops with registered uses.
6. During CCPR50 (April 2018) the results were presented. The key objectives of the registration database were reconfirmed, which were to provide members with a data source to facilitate support of commodities no longer supported in a periodic re-evaluation and to determine the global registration status of unsupported compounds. In the meeting was agreed to establish an EWG to continue to develop this project.<sup>3</sup>
7. In July 2018 Codex Secretariat issued CL 2018/50/OCS-PR inviting members:
  - d to provide comments on
    - (i) proposals to simplify and improve the excel worksheet including other data / information relevant to the further development of the database (e.g. mixtures of active compounds);
    - (ii) the range of active substances that should be added to the database and the time interval to submit updated information.

<sup>1</sup> REP16/PR, paras. 180 to 183

<sup>2</sup> REP17/PR, paras. 174 to 177

<sup>3</sup> REP18/PR, paras. 154 to 183

8. In addition, Codex members and observers are kindly invited to provide comments:
- (i) the need to indicate registration of compounds for non-food uses considering the purpose of the database and the mandate of CCPR;
  - (ii) to limit the exercise to compounds subject to periodic review as opposed to all compounds on the Codex pesticide list as this exercise could be resource-intensive and changes in the registration status may occur during the interval year(s);
  - (iii) to broaden the exercise to all compounds listed on the Codex pesticide list but using a stepwise approach by which the initial / priority focus will be on compounds subject to periodic review listed in Tables 2A and 2B and will incrementally incorporate other compounds from the Codex pesticide list;
  - (iv) the need for criteria for selecting / prioritizing active substances for inclusion in the database
  - (v) to provide additional comments as may be relevant.

### **Results**

9. The comments to the CL were compiled and summarized. Both documents were presented to the Members of the EWG. Additionally a proposal to simplify the excel spread sheet was provided by The Netherlands. This document was also made available to the Members of the EWG.
10. The proposed excel sheet may not fulfill the requirement of a few Codex Members asking for a computer aided filling of the boxes.
11. A limited number of answers agree with the conclusions and propose to continue the debate at CCPR51 (2019). The proposed new excel spreadsheet was supported.
12. The excel file proposed by The Netherlands is provided in Appendix I. This appendix is for consideration by CCPR. The list of comments received is added as Appendix II. The overall summary and conclusion is added as Appendix III. These appendices are for information by CCPR.

### **Conclusion**

#### **For consideration by CCPR:**

13. There are no objections to maintain the national registration database with some improvements and simplifications. The data base should than run for 3 years with a new round of discussion 2022.

### **Recommendations**

#### **For consideration by CCPR:**

14. To maintain the National Registration Database with some improvements and simplifications as proposed by The Netherlands. The data base should than run for 3 years with a new round of discussion 2022.
15. Other global databases on registered pesticides might be retrieved once CCPPR attains the aim that this database become the National Registration Database and is then regularly updated by Members.

**EXCEL FILE PROPOSED BY THE NETHERLANDS FOR REGISTERED USES OF SUBSTANCES  
(EXAMPLE 2 OF THE EXCEL FILE)**

**(For consideration by CCPR)**

Please access the following link: <https://drive.google.com/open?id=18dbgEWXrhaH7H8ziHqmA97YtJfivUWG>

**APPENDIX II**

**Consolidated reconciliation report for replies to CL 2018/50-PR - Request for comments and information on national registration for pesticides  
Comments received from Australia, Canada, Chile, China, Egypt, IAEA, Iran, Netherlands, Syrian Arab Republic, Uruquay, USA  
(For information)**

**GENERAL COMMENTS****China**

China appreciates the meticulous work of EWG on further developing the national registration database, and would like to assist in completing the national registration database.

*Category : EDITORIAL*

**Iran**

Iran appreciates the carefully work of EWGs to further develop the national registration database .Iran is grateful and willing to assist in completing the national registration database. In this way Iran provided National MRL Database.

*Category : EDITORIAL*

**Netherlands**

The Netherlands appreciates the opportunity to provide comments in response to the Circular Letter (CL 2018/50/OCS-PR) requesting proposals to simplify and improve the excel worksheet to the further development of the database for national registrations.

In recent years, the Codex Committee on Pesticide Residues (CCPR) has agreed to update an overview of national registrations with additional compounds that are listed for periodic review with their changes to national registration. The frequency of updates; the appropriate number of compounds to be added to the database; the criteria for selecting / prioritizing compounds for inclusion in the database; and the further broadening of the database to include all compounds listed on the CCPR pesticide list should be determined.

*Category : EDITORIAL*

**Syrian Arab Republic**

No comments.

*Category : EDITORIAL*

**SPECIFIC COMMENTS ON QUESTIONS IN PARAGRAPHS 7 AND 8 OF CX/PR 19/51/18****PARAGRAPH 7****QUESTION (i): Proposals to simplify and improve the excel worksheet including other data / information relevant to the further development of the database (e.g. mixtures of active compounds)****Australia**

To simplify the spreadsheet, members should be asked to list commodities and commodity groups (including animal feed commodities) for which they have approved uses (as per registered labels) in English alphabetical order.

This will be consistent with the way commodities are listed in the Codex MRL database (and Australia's original proposal).

If a product containing two or more pesticides is registered for use on say, citrus fruits, pome fruit, macadamia nuts and pineapple, then citrus fruits, pome fruits, macadamia nuts and pineapple should be listed under each of the pesticides present in the registered product.

*Category: TECHNICAL*

**Chile**

- a) It is agreed to maintain the content of the first sheet of the Excel file, related to the existence or non existence of a register data base of each country for pesticide.
- b) In the sheet where the existing CXLs for each pesticide are listed, it would be useful to add in the columns the countries that have at least one registered food, indicating with an "X" when it has a record for each food with CXL.
- c) The above, because it is aimed to know the status of each pesticide listed in categories 2A and 2B worldwide, in relation to the CXL in process of evaluation, information that has been considered useful to define whether it is maintained or not. This way it can be determined which and how many of these CXL are important for the countries that have a register data base.

**Chile**

- a) Se apoya que se mantenga el contenido de la primera hoja del archivo Excel, relativa a la existencia o no de registro en cada país para cada plaguicida.
- b) En la hoja donde se listan los CLX existentes para cada plaguicida, resultaría útil agregar en las columnas los países que tienen al menos un alimento registrado, indicando con una "X" cuando cuenta con registro para cada uno de los alimentos con CXL.
- c) Lo anterior, porque lo que se busca conocer la situación de cada plaguicida listado en las categorías 2A y 2B a nivel mundial, respecto a los CXL que están en proceso de evaluación, información que se ha considerado útil para definir si se mantiene o no. Así se podría conocer cuáles y cuántos de estos CXL tienen importancia para los países que cuentan con registro.

*Category : TECHNICAL*

**China**

The overall design of the table can meet the needs of the database. However, as a class of pesticides, dithiocarbamate pesticides are recommended to list the source of active components separately, in order to facilitate the search and query of the table. Meanwhile, the specific active ingredients of mixtures should be listed in the table.

*Category : TECHNICAL*

**Canada**

Canada supports the current format of the spreadsheet as it standardizes the content of the information making it easier to manipulate and consolidate, when required, the registration status from various member countries and observers. Similar to the example provided (mancozeb, propineb), further consideration should be given to those active ingredients where their metabolites may also be active ingredients (e.g., acephate/methamidaphos, triadimefon/triadimenol, thiodicarb/methomyl).

*Category : SUBSTANTIVE*

**Egypt**

Egypt proposes to provide the national database of registered pesticides with an Excel Worksheet for mixtures of active compounds.

Category : *TECHNICAL*

**Iran**

To simplify the spreadsheet, members should be asked to list commodities and commodity groups (including animal feed commodities) for which they have approved uses (as per registered labels) in English alphabetical order.

This will be consistent with the way commodities are listed in the Codex MRL database .

Category: *TECHNICAL*

**Netherlands**

- To prevent workload of typing in all crops in which products are registered, the Codex crops could be listed in the first row or column. MS only have to fill in a “Y” if a registered label exists for the crop.
- For a better overview the groups can be listed sequentially in the same row or column. This way, all the crops for which a registered label exists for each substance are all listed in one row or column.
- The use of filters can be helpful. To make the use of filters possible, the table should be transposed. During filling the table, when a user has trouble finding a crop, the user can then use the filter to find a crop quicker.
- When the table is filled, with the filter an overview of only the registrations can be shown. Filter on “Y”
- If desirable, different letters can be used to make a classification. For example to mention whether a substance is authorized solo = S, as a mixture =M or both = B.

Category : *SUBSTANTIVE*

**Uruguay**

*Courtesy translation*

To help member countries complete the National Records database, it is proposed to include the drop-down list of the crops belonging to each food and feed group. In this way, the crop for which the pesticide in question is registered is directly selected. Additionally, the possibility of listing foods not included in the current classification should be allowed.

In the case of mixtures, it is proposed that a column be included in the database, indicating whether the pesticide is present individually or as a mixture. In the latter case, include in an additional column the other active ingredients that make up the mixture.

Category : *TECHNICAL*

**Uruguay**

Para ayudar a los países miembros a completar la base de datos de Registros Nacionales, se propone incluir la lista desplegable de los cultivos que pertenecen a cada grupo de alimentos y piensos. De esta forma, se selecciona directamente el cultivo para el cual está registrado el plaguicida en cuestión. Adicionalmente debería permitirse la posibilidad de listar alimentos no incluidos en la clasificación actual.

Para el caso de mezclas, se propone que se incluya una columna en la base de datos, en la que se indique si el plaguicida está presente en forma individual o como mezcla. En este último caso, incluir en una columna adicional los otros ingredientes activos que componen la mezcla.

**USA**

As indicated prior to CCPR-50, the U.S. Delegation can supply the requested data in this format, but has concerns about the structure of the data table. In particular, a tabular format normally implies a relationship across columns, but in this table Column B (Pesticide) has independent relationships with Column D-I. For example, there is no relationship between Fruits (Column D) and Vegetables (Column E). Because the data is not in a standard data format, additional manual data entry work is required to translate U.S. information into the requested format.

Therefore, it may be worth exploring if there are data formats that help simplify data entry and better facilitate more automatic export of data from external data sources. For example, the Excel template might include the following key fields in a more standard database format: Member, Registered (Y/N), Commodity Group, and Commodity.

*Category : SUBSTANTIVE*

**IAEA**

In the excel spreadsheet:

- a) The heading of column B and row 4 should be corrected for a spelling mistake ("l" missing in the word pesticides)
- b) The heading of the excel spreadsheets could contain in the form of comments all the detailed instructions for entering information; these are currently available as a separate instruction sheet.
- c) The excel spreadsheet could be prepared as a macro and input fields clearly marked to avoid no entries, where those are essential.
- d) Additional areas should be allowed and marked for entering submissions that member countries consider appropriate, i.e. mixtures of actives, etc., even if not included in table 2A and 2B. This additional data can be stored and made available should the need arise for "emergency response".

*Category : EDITORIAL*

**QUESTION (ii): The range of active substances that should be added to the database and the time interval to submit updated information.****Australia**

Consistent with Australia's position for 50CCPR, no more than 10 pesticides should be added to the database each year.

Note: each year about 5 new compounds are added to Table 2A and 2B of the CCPR Schedules and Priority Lists.

*Category : TECHNICAL*

**Canada**

Canada supports a 5 year cycle for updating the National Registration Database for a maximum of 30 active substances. However, should the decision be to update the database every 2-3 years, Canada believes that the number of active substances should be reduced to no more than 10.

*Category : SUBSTANTIVE*

<p><b>Chile</b></p> <p>Chile considers that the database should be limited to pesticides 2A and 2B, for periodic review in the context of the priority lists. Otherwise, the information would be very broad and the focus of what is sought with it in terms of management is lost.</p> <p>As an additional background and as mentioned in the last meeting of the CCPR, the objective of this work were always the compounds listed in 2A and 2B, since for the rest of the compounds there are a series of databases available that allow to have antecedents of pesticide register data bases globally.</p> <p>Regarding the update interval, it is suggested to be at least annual and that facilities be provided so that the countries be the ones who carry out this update, either through Codex Contact Points or through a formally informed user by Codex Members</p> <p><i>Category : TECHNICAL</i></p>	<p><b>Chile</b></p> <p>Chile considera que la base de datos debe limitarse a los plaguicidas 2A y 2B, para revisión periódica en el contexto de la listas de prioridades. De lo contrario, la información sería muy amplia y se pierde el foco de lo que se busca con ella en términos de gestión.</p> <p>Como antecedente adicional y tal como se mencionó en la última reunión del CCPR, el objetivo de este trabajo siempre fueron los compuestos listados en 2A y 2 B, ya que para el resto de compuestos hay una serie de bases de datos disponibles que permiten contar con antecedentes de los registros de plaguicidas a nivel global.</p> <p>Respecto al intervalo de actualización, se sugiere que este sea por lo menos anual y que se entregue las facilidades para que los mismos países, ya sea a través de los Puntos de Contacto Codex o mediante un usuario informado de manera formal por los Miembros del Codex, sean los que lleven a cabo dicha actualización.</p> <p><i>Category : TECHNICAL</i></p>
<p><b>China</b></p> <p>China suggests that 20 active ingredients should be added into the database every year. The priority is as follows: pesticides in Table 2A, pesticides in Table 2B, pesticides for new use and other, and finally new compound. The update interval for database is suggested to be 3 to 5 years.</p> <p><i>Category : TECHNICAL</i></p>	
<p><b>Egypt</b></p> <p>Egypt would like to inform you that the range of active substance about 20:25 active substance registered annually.</p> <p><i>Category : TECHNICAL</i></p>	
<p><b>Iran</b></p> <p>It is suggested that 10 kinds of active components should be added to the database every year. The order of priority is as follows: first, pesticide in Table 2A, then in Table 2B, third, pesticides for new use and other and finally new compound. The interval to updated information is suggested to be 3 to 5 years.</p> <p><i>Category : TECHNICAL</i></p>	
<p><b>Uruguay</b></p> <p><i>Courtesy translation</i></p> <p>With regard to the range of substances to be included in the database, it is considered convenient to include the pesticides in tables 2A and 2B, considering a maximum of 20 to 30 pesticides annually. The update should be every 2 or 3 years.</p> <p><i>Category : TECHNICAL</i></p>	<p><b>Uruguay</b></p> <p>Con respecto a la gama de sustancias a incluir en la base de datos se cree conveniente incluir los plaguicidas de los cuadros 2A y 2B, considerando un máximo de 20 a 30 plaguicidas en forma anual. La actualización debería ser cada 2 o 3 años.</p> <p><i>Category : TECHNICAL</i></p>

**USA**

The U.S. Delegation supports the views expressed by some delegations at CCPR-50. Specifically Paragraph 155 of CCPR-50 Report states the view that, "the number of compounds to be added to the database should be no more than 5-10 (instead of the proposed 20-30 active substances). In addition, the time cycle for updating registered uses should be 2-3 years rather than 5 years as this exercise could be resourceintensive and changes in the registration status that may occur during the year(s)."

*Category : SUBSTANTIVE*

**IAEA**

- a) The database should be as exhaustive as possible. Data that cannot be analysed within the JMPR sessions can be easily and safely stored for future work, i.e. "emergency evaluations".
- b) The time interval shall be discussed among and agreed by submitting agencies in ad hoc meeting.

*Category : EDITORIAL*

**PARAGRAPH 8**

**QUESTION (i): The need to indicate registration of compounds for non-food uses considering the purpose of the database and the mandate of CCPR (see paragraphs 1 and 11 of CL 2018/50-PR)**

**Australia**

Any registered non-food uses of pesticides are irrelevant to Codex and should not be included in the database.

*Category : TECHNICAL*

**Canada**

Canada supports the inclusion, in the National Registration Database, of active substances registered for use on food and feed moving in international trade. Canada does not support the inclusion of non-food uses.

*Category : SUBSTANTIVE*

**China**

Agree with the recommendation that the registration of non-food compounds should be described in the form.

*Category : EDITORIAL*

**Chile**

According to the mandate, the register data base should be included for non-food uses, but in a second stage, in order to optimize the database first, considering that the uses are mostly for food.

In this case perhaps it should be mentioned, as indicated in point 1, to know if there is a register data base for those non-food products that have CXL.

*Category : TECHNICAL*

**Chile**

De acuerdo al mandato debiera incluirse el registro para usos no alimenticios, pero en una segunda etapa, de manera de optimizar primero la base de datos, considerando que mayoritariamente los usos son alimenticios.

En este caso quizás se debiera acotar, como se señaló en la punto 1, conocer si existe registro para aquellos productos no alimenticios que cuentan con CXL.

*Category : TECHNICAL*

<p><b>Egypt</b></p> <p>We would like to note that there is no need to mention the non-food uses for pesticides inside the database as Codex is basically related to food.</p> <p><i>Category : TECHNICAL</i></p>
<p><b>Iran</b></p> <p>Any registered non-food uses of pesticides are irrelevant to Codex and should not be included in the database.</p> <p><i>Category : TECHNICAL</i></p>
<p><b>Netherlands</b></p> <p><i>Comments 14 I (CL 2018/50-PR):</i></p> <ul style="list-style-type: none"> <li>• <i>Substances authorized in non-food uses can result in residues in following crops. Therefore registration whether a compound is authorized for non-food uses can be of importance. To register such uses an extra “crop” can be added in the excel with for example: “non-food uses”. To keep it simple too much detail in classification of non-food uses should be prevented. In this way, also e.g. dual use, biocide-use can be added</i></li> </ul> <p><i>An example of a table in which these proposals are processed is added:</i></p> <p><i>Proposal-registered_uses-substances-NL-CL 201850OCS-PR</i></p> <p><i>Category : SUBSTANTIVE</i></p>
<p><b>Uruguay</b></p> <p>Se considera adecuado incluir en la base de datos solo los registros para usos alimentarios.</p> <p><i>Courtesy translation</i></p> <p>It is considered appropriate to include in the database only records for food uses.</p> <p><i>Category : TECHNICAL</i></p>
<p><b>USA</b></p> <p>It is unclear why information is needed on registration of non-food uses. Therefore, the database should not include non-food uses unless justification is provided and the need for inclusion of non-food uses is confirmed at CCPR.</p> <p><i>Category : SUBSTANTIVE</i></p>
<p><b>QUESTION (ii): To limit the exercise to compounds subject to periodic review as opposed to all compounds on the Codex pesticide list as this exercise could be resource-intensive and changes in the registration status may occur during the interval year(s)</b></p>
<p><b>Australia</b></p> <p>The database should be limited to only those compounds listed in Tables 2A &amp; 2B.</p> <p><i>Category : TECHNICAL</i></p>
<p><b>Canada</b></p> <p>Canada agrees with the proposal to limit the exercise of populating the National Registration Database with active substances subject to periodic review only (Tables 2A and 2B) with the understanding that all new compounds and new uses and other evaluations, as nominated by member countries, are supported jointly by them and the manufacturers. <i>Category : SUBSTANTIVE</i></p>

<p><b>Chile</b></p> <p>Chile agrees to limit the exercise, because expanding this information would not be a contribution, considering that the register data bases are very dynamic, and each Codex Member manages its own times.</p> <p><i>Category : TECHNICAL</i></p>	<p><b>Chile</b></p> <p>Chile está de acuerdo con limitar el ejercicio, porque ampliar esta información no sería un aporte, considerando que los registros son muy dinámicos y cada Miembro del Codex maneja sus propios tiempos.</p> <p><i>Category : TECHNICAL</i></p>
<p><b>China</b></p> <p>Agrees with the recommendation that pesticides under periodic review, rather than all pesticides in CCPR schedules and priority lists, should be included in the national registration database for the time being.</p> <p><i>Category : EDITORIAL</i></p>	
<p><b>Egypt</b></p> <p>We would like to inform that Egypt issued the Ministerial Decree no. 974/2017 on “The registration , handling , and usage of pesticides in Egypt” that texts on:</p> <p>“Article (6):</p> <p>Agricultural Pesticides Committee (APC) registers active ingredients of agricultural pesticides in their "technical grade" or "formulated" forms, according to the reference database of registered pesticides in European Commission (EC), the U.S. Environmental Protection Agency (U.S.EPA), or in any other agencies accepted by APC.</p> <p>Article (7):</p> <p>APC is entitled, according to the conditions it sets, to restrict the handling and use of registered highly toxic pesticides. This would protect human health, ensure the safety of the environment, and the production of clean crops. In this respect, APC determines the permissible amounts for handling and use of such pesticides, regulates their mode of handling and application, and their trading, in line with the FAO Code of Conduct..</p> <p>Article (8):</p> <p>APC periodically reviews the status of registered agricultural pesticides or those under the process of registration and takes appropriate measures in the light of any new development pertaining to the safety of these pesticides to human health, the environment and the benignity of agricultural crops and their products</p> <p>Article (22):</p> <p>APC is entitled to suspend or revoke the registration of a pesticide or any of its recommendations. The concerned person will be given a grace period until the end of the agricultural season that follows. Suspension or revocation of the pesticide applies on any of the following cases:</p> <ol style="list-style-type: none"> <li>a) Not fulfilling any of all the requirements of pesticide registration stipulated in this decree.</li> <li>b) Reduced efficacy of the pesticide against the target pest.</li> <li>c) Causing imbalance in favor of the pest.</li> <li>d) Causing unexpected hazards to human health, contaminating the environment and surpassing the permissible maximum residue levels (MRLs).</li> <li>e) Lack of reports from well trusted agencies indicating the hazards of the pesticide on human health and the environment.</li> </ol> <p>The concerned person will be notified of the suspension or revocation within 15 days of the decision making by a registered letter with a return receipt, to the mail address stated in his registration application. The concerned person may appeal against the revocation within 30 days of receiving the letter of notification. APC studies the appeal with an irrefutable decision within 60 days from the date of its submission.”</p> <p>We don't mind to provide the database with the above mentioned criteria.</p> <p><i>Category : TECHNICAL</i></p>	

<p><b>Iran</b></p> <p>The database should be limited to only those compounds listed in Tables 2A &amp; 2B.  <i>Category : TECHNICAL</i></p>	
<p><b>Uruguay</b></p> <p><i>Courtesy translation</i></p> <p>The advantage of including only the compounds subjected to periodic review is that it would allow a greater response from the countries, so this possibility should be considered.  <i>Category : TECHNICAL</i></p>	<p><b>Uruguay</b></p> <p>La ventaja de incluir solo los compuestos sometidos a examen periódicos es que permitiría obtener una mayor respuesta por parte de los países por lo que debería considerarse esta posibilidad.  <i>Category : TECHNICAL</i></p>
<p><b>USA</b></p> <p>The U.S. Delegation supports limiting the database to only compounds subject to periodic review.  <i>Category : SUBSTANTIVE</i></p>	
<p><b>IAEA</b></p> <p>This is true, however when review is started, a confirmation by the submitting authority that no changes have occurred during the interval years is much easier than asking for submission of information.  <i>Category : EDITORIAL</i></p>	
<p><b>QUESTION (iii): To broaden the exercise to all compounds listed on the Codex pesticide list but using a stepwise approach by which the initial / priority focus will be on compounds subject to periodic review listed in Tables 2A and 2B and will incrementally incorporate other compounds from the Codex pesticide list</b></p>	
<p><b>Australia</b></p> <p>If the exercise is limited to those pesticides listed in Tables 2A &amp; 2B as proposed above, more and more compounds will be incorporated into the database over time, but in an organised, manageable manner.  <i>Category : TECHNICAL</i></p>	
<p><b>Canada</b></p> <p>Canada agrees with the proposal to limit the exercise of populating the National Registration Database with active substances subject to periodic review only (Tables 2A and 2B) with the understanding that all new compounds and new uses and other evaluations, as nominated by member countries, are supported jointly by them and the manufacturers.  <i>Category : SUBSTANTIVE</i></p>	
<p><b>Chile</b></p> <p>Chile does not agree with extending the exercise, for the reasons explained in the previous answers.  <i>Category : TECHNICAL</i></p>	<p><b>Chile</b></p> <p>Chile no está de acuerdo con ampliar el ejercicio, por las razones expuestas en las respuestas anteriores.  <i>Category : TECHNICAL</i></p>

<p><b>China</b></p> <p>Agreed with the proposal to progressively update the database, until all pesticides in CCPR schedules and priority lists have been included in the national registration database.</p> <p><i>Category : EDITORIAL</i></p>	
<p><b>Iran</b></p> <p>If the exercise is limited to those pesticides listed in Tables 2A &amp; 2B as proposed above, more and more compounds will be incorporated into the database over time, but in an organised, manageable manner.</p> <p><i>Category : TECHNICAL</i></p>	
<p><b>Uruguay</b></p> <p><i>Courtesy translation</i></p> <p>The inclusion of all pesticides in a progressive manner requires a very important workload, so it is considered more important to prioritize the compounds included in tables 2A and 2B, so that countries have the resources available for sending the information</p> <p><i>Category : TECHNICAL</i></p>	<p><b>Uruguay</b></p> <p>La inclusión de todos los plaguicidas en forma progresiva requiere una carga de trabajo muy importante, por lo que se considera más importante priorizar los compuestos incluidos en los cuadros 2A y 2B, de forma que los países tengan los recursos disponibles para el envío de la información.</p>
<p><b>USA</b></p> <p>As indicated above, the U.S. supports limiting the database to only compounds subject to periodic review. If compounds listed in Tables 2A and 2B are fully incorporated into the database, it may be worth examining if the database should be expanded to other compounds.</p> <p><i>Category : SUBSTANTIVE</i></p>	
<p><b>QUESTION (iv): The need for criteria for selecting / prioritizing active substances for inclusion in the database</b></p>	
<p><b>Australia</b></p> <p>There is no need to include prioritisation criteria in the database. This part of the prioritisation process is effectively and more appropriately covered in the Codex Procedure Manual.</p> <p><i>Category : TECHNICAL</i></p>	
<p><b>Canada</b></p> <p>The main criteria for prioritizing active substances for inclusion in the database should be the knowledge of a public health concern. However, another criteria for prioritizing an active substance may be the number of existing Codex MRLs for the pesticide. For example, an active substance with greater than 10 Codex MRLs for which most of the uses are currently registered in member countries should be prioritized ahead of a pesticide for which there are much fewer Codex MRLs and for which uses may no longer be registered in member countries (i.e., carbaryl vs dodine).</p> <p><i>Category : SUBSTANTIVE</i></p>	

<p><b>Chile</b> Chile considers that pesticides 2A and 2B should be delimited, for which criteria are established in the document on Principles for the Analysis of Risks Applied by the Codex Committee on Pesticide Residues, included in the Procedures Manual. <i>Category : TECHNICAL</i></p>	<p><b>Chile</b> Chile considera que se debe acotar a los plaguicidas 2A y 2B para los cuales los criterios están establecidos en el documento sobre Principios para el Análisis de Riesgos Aplicados por el Comité del Codex sobre Residuos de Plaguicidas, incluido en el Manual de Procedimientos. <i>Category : TECHNICAL</i></p>
<p><b>China</b> We propose the following criteria for selecting compounds to be included in the database: 1. The year of the last full-evaluation; 2. Comprehensive consideration of the registration status of the country and the number of registered countries; 3. The amount of pesticide used. <i>Category : TECHNICAL</i></p>	
<p><b>Iran</b> There is no need to include prioritisation criteria in the database. This part of the prioritisation process is effectively and more appropriately covered in the Codex Procedure Manual. <i>Category : TECHNICAL</i></p>	
<p><b>Uruguay</b> <i>Courtesy translation</i> The priority is given for the compounds subject to the periodic review included in tables 2A and 2B. <i>Category : TECHNICAL</i></p>	<p><b>Uruguay</b> La prioridad es dada para los compuestos objeto del examen periódico incluidos en los cuadros 2A y 2B. <i>Category : TECHNICAL</i></p>
<p><b>IAEA</b> Criteria to be used could include published monitoring/surveillance data and risk assessments by national authorities or regional bodies. <i>Category : EDITORIAL</i></p>	
<p><b>QUESTION (v): To provide additional comments as may be relevant</b></p>	
<p><b>Australia</b> Members should be requested to update their inputs into the database at least every 7 years. The CCPR should consider how to evaluate the usefulness of the database within the next 3 years. If the effort to maintain the database is not demonstrated, then the work should cease. <i>Category: TECHNICAL</i></p>	
<p><b>Canada</b> Canada recommends that CropLife International become more engaged in the development of the National Registration Database as the manufacturers are the most knowledgeable on the registration status of the active substances on Lists 2A and 2B. <i>Category : SUBSTANTIVE</i></p>	

**Chile**

As long as available resources allow it, it would be beneficial to have a database other than Excel that makes the search for information easier, since this is currently not easy to manage.

*Category : TECHNICAL*

**Chile**

En la medida que los recursos disponibles lo permitan sería beneficioso contar con una base de datos distinta al Excel y que facilite la búsqueda de información, ya que esto actualmente no es fácil manejo.

*Category : TECHNICAL*

**SUMMARY OF COMMENTS SUBMITTED  
IN REPLY TO CL 2018/50-PR (July 2018)  
(For information)**

**Request for comments**

**13. Codex members and observers are kindly invited to provide comments on the following:**

**(i) proposals to simplify and improve the excel worksheet including other data / information relevant to the further development of the database (e.g. mixtures of active compounds)**

**Summary of comments**

The following proposals were made

- To include detailed instructions in comment boxes in the heading of the spreadsheet.
- To use macros and input fields
- To add additional fields for substantial comments to be made by Members
- To ask Members to list commodities and commodity groups (including animal feed commodities) for which they have approved uses (as per registered labels) in English alphabetical order
  
- To include a drop down list of the crops belonging to each food and feed group
- Allowing to select food crops not included in the Codex classification
- To re-arrange the table with a fixed column of food and feed by crop group and crops with the aim that only "Y" need to be added by a MS in the entire cell
- To use filter for working with the spreadsheet.
- To explore if there are data formats that help simplify data entry and better facilitate more automatic export of data from external data sources. For example, the Excel template might include the following key fields in a more standard database format: Member, Registered (Y/N), Commodity Group, and Commodity.
  
- To further elaborate how to handle active substances having the same metabolite to be analysed (e. g. dithiocarbamates, active substances where their metabolites may also be an active substance (e.g., acephate/methamidaphos), use of isomers (e. g. cyfluthrin/ $\beta$ -cyfluthrin)
  
- To provide a spreadsheet for mixtures of active compounds
- To include a column indicating whether the pesticide is present individually or as a mixture; if yes other active substances should be mentioned in an additional column.
- To use different letters to indicate whether an active substance is authorized solo, as a mixture or both.
- In case of mixtures, commodities should be listed under each pesticide in the mixture
  
- to maintain the content of the first sheet of the Excel file, related to the existence or non-existence of a registration in each country for the pesticide
  - o restricted to active substances listed in Tables 2A and 2B and
  - o include in the sheet where the existing CXLs for each pesticide are listed a columns listing the countries that have at least one registered food and indicating with an "X" when it has a record for each food with CXL.

**Comment**

Some room for improvement can be seen from comments.

**13. Codex members and observers are kindly invited to provide comments on the following:****(ii) the range of active substances that should be added to the database and the time interval to submit updated information**Summary of comments

The following proposals were made

- 5-10 active substances per year, updated every 2-3 years
- Maximum of 10 active substances per year, updated every 2-3 years or maximum of 30 active substances updated every 5 years
- To add 20-25 active substances per year
- As exhaustive as possible
- 10 active substances per year (priority as from Table 2A and 2B), updated every 3-5 years
- 20 active substances per year (priority as from Table 2A and 2B), updated every 3-5 years
- 20-30 active substances per year (priority as from Table 2A and 2B), updated every 2-3 years
- Only substances from Table 2A and 2B, annual updated. For other as the use of other available databases on globally registered pesticides could be an option.

Comment

More than 20 active substances per year is in contradiction to the proposal here and below to restrict the exercise to the periodic review substances in Table 2A and 2B.

**14. In addition, Codex members and observers are kindly invited to provide comments as follows:****(i) the need to indicate registration of compounds for non-food uses considering the purpose of the database and the mandate of CCPR (see paragraphs 1 and 11)**Summary of comments

In the majority of comments the need for inclusion of compounds for non-food uses are questioned. Only in one case, where the inclusion was recommended, a reasoning was given as residues in succeeding crops may occur.

Comment

Despite of some advantages the inclusion of non-food uses is not recommended.

**14. In addition, Codex members and observers are kindly invited to provide comments as follows:****(ii) to limit the exercise to compounds subject to periodic review as opposed to all compounds on the Codex pesticide list as this exercise could be resource-intensive and changes in the registration status may occur during the interval year(s)**Summary of comments

Most of the comments proposes to limit the database to only compounds subject to periodic review, i. e. Table 2A and 2B.

Only in one case the advantage of having a database was mentioned.

Comment

Clear vote.

**14. In addition, Codex members and observers are kindly invited to provide comments as follows:****(iii) to broaden the exercise to all compounds listed on the Codex pesticide list but using a stepwise approach by which the initial / priority focus will be on compounds subject to periodic review listed in Tables 2A and 2B and will incrementally incorporate other compounds from the Codex pesticide list**Summary of comments

All comments propose to restrict the work to active substances in the periodic review.

Comment

Clear vote.

**14. In addition, Codex members and observers are kindly invited to provide comments as follows:**

**(iv) the need for criteria for selecting / prioritizing active substances for inclusion in the database**

Summary of comments

The following criteria were proposed

- compounds subject to the periodic review included in tables 2A and 2B (based on the Risk Analysis Principles)
- the year of the last full-evaluation
- comprehensive consideration of the registration status of the country and the number of registered countries
- the amount of pesticide used.
- knowledge of a public health concern
- the number of existing Codex MRLs for the pesticide, given substances with a high number of CXL (e.g. >10) a higher priority
- published monitoring/surveillance data
- risk assessments by national authorities or regional bodies
- the need of prioritisation criteria is questioned since guidance is given in the Procedural Manual.

Comment

A few new ideas for prioritisation are made. The amount of pesticide used is quite interesting but publication on active substances basis made be restricted.

**14. In addition, Codex members and observers are kindly invited to provide comments as follows:**

**(v) to provide additional comments as may be relevant**

Summary of comments

Three proposals were made:

- a) To use a database instead of an excel spreadsheet allowing more flexibility in managing and searching.
- b) To engage CropLife International in development of the data base since they have the best knowledge on the registration status.
- c) To request an update of the inputs into the database at least every 7 years. The CCPR should consider how to evaluate the usefulness of the database within the next 3 years. If the effort to maintain the database is not demonstrated, then the work should cease.

Comment

The question of a database can be discussed when all Members agree on the way forward with the National Registration data base. As proposed that can be done after a period of three years of experience.

## Overall summary

A widespread of comments were received with some very divergent view on how to proceed with the data base.

Although a majority of comments were in favour to add active substances (up to 30) on a yearly basis and to updated them regularly (para 13 (ii)) all comments propose not to broaden the scope and restrict the data base to periodic review. By using only active substances for periodic review a complete data base might become available within the next 25 years.

Some proposals were made to improve and simplify the database with a concrete Proposal submitted by the Netherlands which may allow to include some information on uses and mixtures of pesticides. According to my understanding from CCPR 2018 the problem was not indicating mixtures of pesticides but to retrieve them from the list of authorised pesticides. In addition, the question whether a pesticide contain one or more active substances is of interest in cumulative risk assessments. For MRL setting for a certain active substance the question is of interest when one of the active substances enhance the residues of another one which is quite seldom the case.

Non-food uses should not be included in the data base.

Some interesting criteria were proposed which might be useful when the addition of active substances is not restricted to periodic review compounds. For periodic review compounds clear guidance is given in the Risk Analysis Principles.

Two comments should be mentioned here that might be of interest.

- a) To engage CropLife International in development of the data base since they have the best knowledge on the registration status.

From the discussion last year a proposal to use a commercial data base instead of the National Registration Database was not a favourite option of the Codex Secretariat. In addition, the following question should be answered: Who will CropLife International motivate to include registered uses in a database when it is known from Table 2A and 2B that industry has no interest to support an active substance?

- b) It was mentioned that the use of other available databases on globally registered pesticides could be an option.

Is it possible to ask interested Members to retrieve such databases in cases where an active substance is not supported or less than 10 respondents to the National registration database indicate an use/authorisation of the entire active substance.

**APPENDIX IV****LIST OF PARTICIPANTS**

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