

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5a, 5b, 6, 7a,7b,7c, 7d, 8, 9, 11, 12, 13, 14, 16, 17

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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(Comments of Arab Industrial Development, Standardization and Mining Organization)

The objective of this Conference Room Document is to offer comments on behalf of the Arab Industrial Development, Standardization and Mining Organization (AIDSMO), an observer organization of the Codex Alimentarius Commission, on various agenda items tabled at the 53rd Session of the Codex Committee on Pesticide Residues (CCPR53).

These comments were developed by an Expert Group of the Arab Codex Initiative and with consultation of Codex contact points of Arab countries.

These comments should not be considered as an official position in lieu of the official position of country delegations, members of the League of Arab states, represented at the CCPR53.

Agenda Item 5a: REPORT ON ITEMS OF GENERAL CONSIDERATION ARISING FROM THE 2021 JMPR EXTRA AND REGULAR MEETINGS: INTERNATIONAL ESTIMATE OF SHORT-TERM INTAKES (IESTI) EQUATIONS Section 2 of the JMPR Report (English only)

The conclusions reached by the EWG and JMPR are informative and continue to support the evolutionary nature of risk assessment methodologies. The Risk Assessment Community in the Arab region supports these developments, which will continue to enhance its own approaches in risk assessment to enable the development of MRLs relevant for the region, based on trial data, when available.

Agenda Items 5b & 6: RESPONSES TO SPECIFIC CONCERNS RAISED BY CCPR AND MRLS FOR PESTICIDES IN FOOD AND FEED (AT STEPS 7 AND 4) CX/PR 22/53/5

In its aim to support the substantial work performed by JMPR for the proposition of MRLs for pesticides, AIDSMO will encourage Arab food and feed competent authorities to generate and provide updated data related to pesticide residues from the Arab region, and that to support dietary exposure assessment for pesticide in food, particularly relying on food consumption data relevant to the region and to update the relevant Cluster Diet in the GEMS/Food database.

Agenda Item 7a: REVISION OF THE CLASSIFICATION OF FOOD AND FEED (CXA 4-1989): ESTABLISHMENT OF MRLS FOR PESTICIDES FOR OKRA CX/PR 22/53/6

Okra is an important crop and a substantial food commodity widely cultivated and consumed in the Arab region.

AIDSMO supports every effort to have Okra covered by MRLs, where pesticide use is needed for the production of this crop. The limited availability of field trials to enable the establishment of MRLs supports the approach to have Okra classified in a manner where other MRLs for a surrogate crop could be applied. This is critical to ensure availability and reliance on established Pesticide MRLs supporting the safety and trade of this important crop for the Arab region.

While Chili pepper may not be the best representative crop for Okra, given the differences in texture, agriculture practice or consumption, using this commodity as a possible surrogate for establishment of codex MRLs is the best available approach, based upon the data available to date.

AIDSMO, supports option 2 identified by the Electronic Working Group i.e. to have Okra listed in an individual sub-class referring to Chili Pepper.

AIDSMO will work with food competent authorities of Arab states to enable the availability of data in support of identifying another more suitable surrogate crop for Okra.

Agenda Items 7b / 7c: CLASS B – PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN (ALL TYPES) (AT STEP 4)**CLASS E - PROCESSED FOODS OF ANIMAL ORIGIN (ALL TYPES) (AT STEP 4) CX/PR 22/53/7, 8**

The proposed amendments in the classification systems (class B and E) are well substantiated.

Regarding class B, AIDSMO supports continuous harmonization with the definitions proposed by CCRVDF25 (2021).

For type 7 poultry products; regarding the replacement of the term “poultry” by “avian”; AIDSMO suggests harmonization of the new term “avian” with the definitions proposed by CCRVDF.

Agenda Items 7d / 8: COORDINATION OF WORK BETWEEN CCPR AND CCRVDF CX/PR 22/53/9, 10

Given the importance of this effort to alleviate confusion and prevent situations where there may be misaligned standards for the same substances, depending on their intended use, with possible negative impacts on international trade, it will be important to bring the different terminology, definitions and Guidelines used by CCPR and CCRVDF in line, aiming, where possible, for the establishment of single/harmonized MRLs for the same tissue/food for compounds with dual uses.

Agenda Item 9: GUIDELINES FOR COMPOUNDS OF LOW PUBLIC HEALTH CONCERN THAT MAY BE EXEMPTED FROM THE ESTABLISHMENT OF CODEX MRLS OR DO NOT GIVE RISE TO RESIDUES (AT STEP 7) CX/PR 22/53/11

These guidelines are intended to be used by countries' competent authorities that do not have established criteria for the MRLs exemption for active substances or their authorized uses in their respective legislation.

These proposed guidelines are important and will enable relevant authorities to streamline efforts, and resources for pesticide residue management, clearly identifying uses that do not warrant MRLs, and therefore undue regulatory burden.

Agenda Items 11/12/13**Item 11: MANAGEMENT OF UNSUPPORTED COMPOUNDS WITHOUT PUBLIC HEALTH CONCERN SCHEDULED FOR PERIODIC REVIEW CX/PR 22/53/13****Item 12: NATIONAL REGISTRATIONS OF PESTICIDES CX/PR 22/53/14****Item 13: ESTABLISHMENT OF CODEX SCHEDULES AND PRIORITY LISTS OF PESTICIDES FOR EVALUATION/RE-EVALUATION BY JMPR CX/PR 22/53/15**

There is definite benefit from carrying out this work, as it would support the up-to-date nature of Codex standards and help CCPR in its efforts to prioritize and balance the periodic review of pesticides.

AIDSMO will deploy more efforts to encourage competent authorities from the Arab region to follow-up on this item and to participate more actively to the calls for national registration information, so that the realities of pesticide use in the Arab region are reflected in the criteria set to prioritize compounds to be evaluated / re-evaluated by JMPR in future years.

Agenda Item 14: DISCUSSION PAPER ON THE REVIEW OF MASS SPECTROMETRY PROVISIONS CX/PR 22/53/16

The rationale to proceed with this simplification of guidance, through the revocation of CXG56-2005 and the update of CXG90-2017 is well supported.

AIDSMO will encourage Arab Codex delegations towards being more involved in the discussion and playing a leadership role in the completion of the discussion paper, offering proposed amendments to CXG90-2017.

AIDSMO notes also that the completeness of this task will likely require the additional step of consultation with CCMAS, prior to proceeding with the final amendments.

Agenda Item 16: MITIGATION OF TRADE IMPACTS ASSOCIATED WITH THE USE OF ENVIRONMENTAL INHIBITORS IN AGRICULTURE CX/PR 22/53/18

As the topic of environmental inhibitors in agriculture is a new emerging issue, AIDSMO will encourage Arab food and feed competent authorities to start investigating this issue, with the possible generation of data on the prevalence of these chemicals in the environment in the region.

Agenda Item 17: MODIFICATION OF THE PORTION OF COMMODITIES TO WHICH CODEX MRLS APPLY AND WHICH IS ANALYZED: GROUP 14 (ASSORTED FRUITS – INEDIBLE PEEL). CX/PR 22/53/19

AIDSMO supports the proposal made in the discussion paper with regards to restricting the applicability of pesticide MRLs to the edible portion (without the peel) for Group 14 foods. This change will undoubtedly support the trade interests of countries of the Arab region as producers and exporters of these commodities.