

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7(a)

CX/PR 22/53/6-Add.1

June 2022

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDES

53th Session

Virtual

4-8 and 13 July 2022

ESTABLISHMENT OF MRLS FOR PESTICIDES FOR OKRA

Comments in reply to CL 2022/34-PR

*Comments of Canada, Egypt, European Union (EU), Kenya, Mauritius,
Philippines, Republic of Korea, Thailand, United Kingdom, United States of America (USA)*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2022/34-PR¹ issued in May 2022. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached in the **Annex** and are presented in table format.

¹ Codex circular letter, including CL 2022/34-PR, are available on the Codex webpage/Circular Letters:

<http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>

or on the dedicated Codex webpage/CCCF/Circular Letters:

<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

GENERAL/SPECIFIC COMMENTS

OPTION 1

COMMENT	MEMBER/ OBSERVER
<p>As a member of the Electronic Working Group on the Revision of the Classification, and discussed at CCPR 51, Canada provided monitoring data to assist in making a determination on the representative commodity from which okra may be extrapolated.</p> <p>Canada supports Option 2 and creating a new subgroup that contains only okra in the subgroup with Chili pepper as the example for the representative crop. This would be consistent with other commodity groups for which a similar approach has been taken; a separate subgroup has been established with only a single commodity in the subgroup. An example is the Spices Subgroup 028G, aril which includes only Mace as a commodity within this subgroup. Option 2 also provides better clarity and will lead to less confusion as to the representative crop for okra.</p>	Canada
<p><u>Position:</u> Ghana supports the option 1</p> <p><u>Rationale:</u> This is because there is enough data to justify the classification of okra and pepper in the same group. However, whenever data is available, we will wish to separate okra from pepper because of their differences in tissue absorption.</p>	Ghana
<p>The Philippines agrees with Option 1 retaining okra to Subgroup 12B – pepper and pepper-like commodities including the annotations 1 & 2 for extrapolation of MRLs for okra.</p> <p>The established MRLs for okra in the Philippines are adopted from Codex, ASEAN, JAS, and list of proposed MRLs of registered pesticide products following the principles of GAP and Codex principle and guidance for selection of representative commodity.</p>	Philippines
<p>Republic of Korea appreciates the efforts of the EWG, chaired by USA and co-chaired by Netherlands on the establishment of maximum residue limits for pesticides for okra.</p> <p>ROK supports option 1. Okra should be in the subgroup 012B, pepper and pepper-like commodities, and the classification does not need to be changed.</p>	Republic of Korea
<p>Thailand agrees with option 1 that okra commodity should be in subgroup 012B, pepper and pepper-like commodities. Also, a comment or footnote should be added as Peppers (VO 0051): Martynia; Okra (only data from Chili pepper can be used to set a CXL); Peppers, Chili; Peppers, sweet; Roselle.</p> <p><u>Rationale:</u></p> <p>Option 1 is in accordance with the principles of classification. Data from chili pepper are the representative commodity for okra. Thus, okra should be in the same subgroup as chili peppers.</p>	Thailand

COMMENT	MEMBER/ OBSERVER
<p>The UK would like to thank the Electronic Working Group (eWG) chaired by the United States of America and co-chaired by the Netherlands on the preparation of the draft revision of the Codex Classification of Foods and Animal Feeds.</p> <p>It is difficult to fully assess the monitoring data as no information is available on the treatment regimes of okra and the other crops. However, the UK can support option 1 i.e. chili (non-bell) pepper can be used as the representative commodity for okra.</p>	United Kingdom
<p>The United States supports the conclusion in CX/PR 22/53/6 that based on monitoring data provided by Canada and India, chili pepper (non-bell pepper) is the appropriate representative commodity for okra based on the low exceedances for okra and the sufficient conservatism in MRLs derived using the Organisation for Economic Co-operation and Development (OECD) MRL calculator to be protective of actual residues in okra.</p> <p>Based on this support, Option 1 (i.e., using chili pepper as a representative commodity for okra) is the appropriate method to facilitate this change in the Classification.</p>	USA

OPTION 2

COMMENT	MEMBER/ OBSERVER																												
Colombia considera apoyar la opción 2, la cual consiste en transferir quimbombó (okra) a un subgrupo aparte en la Clasificación, lo que permite identificar claramente al pimiento de chile como el producto representativo en esta clasificación.	Colombia																												
Egypt agrees on the option no. 2 to move Okra to a separate subgroup	Egypt																												
Kenya thanks Electronic Working Group chaired by the United States of America and co-chaired by the Netherlands for this work and selects option 2. Kenya further proposes to add sweet pepper as an option to read; Chili or sweet pepper in column 2. Justification: Data for either chili pepper or sweet pepper can be extrapolated to Okra. Since the two crops are of similar morphology hence require similar pest management practices.	Kenya																												
<p>This option is preferred although okra is not of the same family as chilli pepper.</p> <p>In addition, Mauritius welcomes this opportunity to share some testing data as we did not participate in the EWG on same.</p> <p>Only 13 chemical pesticides (as below) are recommended for use on okra in Mauritius. The MRLs have been based as per Codex Alimentarius. A wide range of organic pesticides and biopesticides are also recommended.</p> <p>The main pests and diseases on okra in Mauritius are Amrasca biguttula, the cotton jassid (leafhopper), Tetranychus spp., powdery mildew and Cercospora spp. Use of organic and biopesticides and good cultural practices are mainly recommended for control of pests and diseases, especially at harvest stage since okra is harvested after every 2 days. To note that most of the chemical pesticides recommended have a pre-harvest interval of more than 2 days and hence they are not recommended for use during the harvest period.</p> <p>With regard to pesticide residue monitoring on okra, it is to be noted that 9 samples were sent for analysis in 2021 and 3 samples had no detectable level of pesticide, 2 samples had residues (acetamiprid) within the MRL, 1 sample had residue (acetamiprid) above the MRL and 3 samples contained pesticide not recommended for use in okra.</p> <p>In 2022, 5 samples were analysed for period January to March. 2 samples had no detectable level of residue, 1 sample had residues within the MRL and 2 samples contained pesticides which are not recommended for use on okra.</p> <p>Table 1: Pesticides recommended for use on okra in Mauritius and MRLs Okra/lady's fingers (Abelmoschus esculentus)</p> <table border="1" data-bbox="152 1121 1809 1161"> <thead> <tr> <th data-bbox="152 1121 981 1161">Pesticide (Active ingredient)</th> <th data-bbox="981 1121 1809 1161">MRL (mg/kg)</th> </tr> </thead> <tbody> <tr> <td data-bbox="152 1169 981 1201">Lambda cyhalothrin</td> <td data-bbox="981 1169 1809 1201">0.3</td> </tr> <tr> <td data-bbox="152 1201 981 1233">Azadirachtin</td> <td data-bbox="981 1201 1809 1233">1</td> </tr> <tr> <td data-bbox="152 1233 981 1265">Flonicamid</td> <td data-bbox="981 1233 1809 1265">0.03</td> </tr> <tr> <td data-bbox="152 1265 981 1297">Acetamiprid</td> <td data-bbox="981 1265 1809 1297">0.2</td> </tr> <tr> <td data-bbox="152 1297 981 1329">Abamectin</td> <td data-bbox="981 1297 1809 1329">0.01</td> </tr> <tr> <td data-bbox="152 1329 981 1361">Cypermethrin</td> <td data-bbox="981 1329 1809 1361">0.5</td> </tr> <tr> <td data-bbox="152 1361 981 1393">Deltamethrin</td> <td data-bbox="981 1361 1809 1393">0.01</td> </tr> <tr> <td data-bbox="981 1169 1809 1201">Spiromesifen</td> <td data-bbox="981 1169 1809 1201">0.02</td> </tr> <tr> <td data-bbox="981 1201 1809 1233">Sulfur</td> <td data-bbox="981 1201 1809 1233">No MRL required</td> </tr> <tr> <td data-bbox="981 1233 1809 1265">Spirotetramat</td> <td data-bbox="981 1233 1809 1265">1</td> </tr> <tr> <td data-bbox="981 1265 1809 1297">Chlorantraniliprole</td> <td data-bbox="981 1265 1809 1297">0.6</td> </tr> <tr> <td data-bbox="981 1297 1809 1329">Spinosad</td> <td data-bbox="981 1297 1809 1329">0.02</td> </tr> <tr> <td data-bbox="981 1329 1809 1361">Spinetoram</td> <td data-bbox="981 1329 1809 1361">0.5</td> </tr> </tbody> </table>	Pesticide (Active ingredient)	MRL (mg/kg)	Lambda cyhalothrin	0.3	Azadirachtin	1	Flonicamid	0.03	Acetamiprid	0.2	Abamectin	0.01	Cypermethrin	0.5	Deltamethrin	0.01	Spiromesifen	0.02	Sulfur	No MRL required	Spirotetramat	1	Chlorantraniliprole	0.6	Spinosad	0.02	Spinetoram	0.5	Mauritius
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OPTION 3: ALTERNATIVE OPTION PROPOSED BY EU

COMMENT	MEMBER / OBSERVER
<p>The European Union (EU) would like to thank the Electronic Working Group (eWG) on the revision of the Classification of food and feed chaired by the United States of America and co-chaired by the Netherlands for the preparation of the draft on the revision of the Codex Classification of Foods and Animal Feeds.</p> <p>The EU acknowledges the work done by the eWG to address the difficulties to extrapolate MRLs for okra from the Subgroup Pepper and pepper-like commodities, considering monitoring data from Canada and India for representative commodities from which MRLs for okra could be extrapolated.</p> <p>The EU recognises the difficulty of drawing a conclusion based on the available monitoring data from Canada and India without knowing the Good Agricultural Practices (GAPs) behind the okra residue data. Without being able to compare residue trials on okra and chili peppers with known GAPs, the EU believes that no conclusion can be drawn on appropriate extrapolations and that the use of monitoring data would be justified only if these data can be linked to authorized uses (with comparable GAPs) and if statistically sufficient data points are available.</p> <p>Based on the above, the EU considers that okra should be moved to a separate subgroup and, relying on the JMPR evaluation, that an extrapolation from chili peppers to okra may not be sufficiently supported by data.</p> <p>The EU calls the attention on the fact that, while the scope of the eWG was limited to okra, similar extrapolation issues may exist for other crops belonging to Group 12B, Pepper and pepper-like commodities, such as martynia and roselle.</p> <p>Therefore, concerning the document CX/PR 22/53/6, the EU would like to propose a new option (Option 3) for consideration to the Committee.</p> <p><u>Option 3</u></p> <p>Delete okra, martynia, and roselle from Subgroup 12B “Pepper and pepper-like commodities” and add a new Subgroup 12D “miscellaneous fruit and vegetable other than cucurbits” with okra, martynia, and roselle being the only commodities in this group. Amend Table 2 on Examples of Selection of Representative Commodities (Vegetable Commodity Groups) as to make okra the representative crop for Subgroup 12D, thus allowing no extrapolation, and add okra separately as representative crop in the line of Group 012 “Fruiting vegetables, other than cucurbits”.</p>	<p>EU</p>