

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

CL 2018/17-PR

January 2018

TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat,
Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: REQUEST FOR COMMENTS ON NATIONAL REGISTRATIONS OF PESTICIDES

DEADLINE: 1 March 2018

COMMENTS: See Request for comments

BACKGROUND

1. Following discussion at the 48th Session of the Committee on Pesticide Residues (CCPR48 – April 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. The Committee further agreed that this work would be carried within the framework of the Electronic Work Group on Priorities chaired by Australia and co-chaired by Germany¹.
2. Australia with the assistance of Germany prepared a spreadsheet 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.
3. The outcome was presented and discussed during CCPR49 (April 2017). The Committee agreed that Australia and Germany would continue on the work of the National Registration Database and that a CL should be issued seeking further input to the database. In addition, the Committee 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.
4. The Committee noted that the Codex Secretariat could assist in the establishment of a web-based platform in the Codex website to “house” the national registrations database which would allow each Member country to upload updates and revisions to respective country-specific worksheets. The Committee supported the Codex initiative.²

ONGOING DISCUSSIONS

5. After CAC49 further evaluation of the overall spreadsheet was conducted. It became evident that further clarification was required concerning the information Member countries are requested to enter into the database.
 - a) For each pesticide, it is intended that only those commodities/commodity groups for which there is a registered or approved use in the member country are listed in the database. In other words, Member countries should only list the commodities/commodity groups that appear on the labels registered for the pesticide in their country. A list of commodities/commodity groups for which a national MRL exists may be misleading since national MRLs often include import tolerances for pesticide uses not approved in the particular country concerned.
 - b) In the first exercise in 2016 a few active substances were not adequately included in the provided spreadsheet. This concerns carbofuran and carbosulfan as well as dithiocarbamates. Carbofuran and carbosulfan were shown in one line but two different codes for these two substances exist. The interrelation of the residue definition is acknowledged. Nevertheless uses and CXLs differ for both substances and it is likely that the same applies at a national level.

¹ REP16/PR, paras. 180 and 183

² REP17/PR, paras. 176 and 177

For the dithiocarbamates some inconsistencies in the active substances belonging to this group in the Codex system was observed. In addition, the active substances have different toxicological endpoints. In the past some discussions on methods of analysis and separate MRLs took place³. Therefore, it might be useful to indicate the active substance for which a use is authorized and for which active substance has a registered use for the different commodities/commodity groups.

- c) Finally, CXLs are set for active substances used in animal premises and/or for direct external use on animals. This point is not yet covered.
6. To facilitate the work of Member countries and to avoid misunderstandings in naming of commodities / commodity groups it seems appropriate to request Member countries to list commodities/commodity groups according to the *Classification of Food and Feed* (CXM 4-1989). Therefore, the spreadsheet was rearranged to clarify this point.
 7. As an overall aim of the exercise a database was initially proposed. It was deemed necessary to restructure the spreadsheet to better manage the information submitted by Member countries and to facilitate the development of a database if it is decided to do so in future. Each commodity or commodity group should be included separately. In addition, they should be sorted by the types of the Classification. For this reason, additional columns were added covering the types 01 Fruits, 02 Vegetables, 03 Grasses, 04 Nuts and seeds, 05 Herbs and Spices, 11 Primary feed commodities as well as animals from types 06 Mammalian products and 07 Poultry products.

NEW EXERCISE

8. Based on the above mentioned changes a new exercise is proposed. For the reasons given above, a new spreadsheet was set up containing three tables. The first table named "Instructions" contains instructions to fill the remaining two tables. These instructions are added as an Annex to this CL.
9. The second table named "Member (2016)" lists the same pesticides shown on the spreadsheet used prior to CCPR49. Member countries are kindly requested to repeat the previous exercise, using the instructions given, to overcome the gaps described above. Member countries are requested to enter their country in place of the word "Member" once they have filled in the spreadsheet.
10. During the CCPR49 it was decided to broaden the scope to all compounds listed on the CCPR Pesticide List. Given the repetition of last year's exercise and the new set-up of the spreadsheet, the chair and co-chair of the electronic working group believe that filling the spreadsheet for all active substances will be an overburden of work for all Member countries and a stepwise approach seems to be more appropriate. Therefore, the third table named "Member (2017)" includes only 24 new active substances. These active substances are currently listed in Table 3 of CCPR Schedules and Priority Lists with last complete toxicological evaluation in 2002 or before (except those covered by 2016 exercise). Member countries are kindly requested to fill in this new spreadsheet using the instructions given in the Annex. After filling the table, Member countries should enter their country name in place of the word "Member".

REQUEST FOR COMMENTS

11. Member countries are invited to provide information on their national registrations for pesticides by filling in the new spreadsheet using the instructions given in the Annex. After filling the table, Member countries should enter their country name in place of the word "Member".
12. In addition, Member countries are invited to comment on the following questions and send their replies to the Chair of the EWG (Email: ian.reichstein@agriculture.gov.au) with a copy to the Codex Secretariat (Email: codex@fao.org).
 - a) It is suggested that no more than 20 – 30 active substances should be added to the National Registration Database each year. Do Member countries consider this to be an acceptable and manageable number?
 - b) From time to time the content of the National Registration Database needs an update concerning registered uses. Is a 5 year cycle acceptable?
 - c) The Chair and co-chair of the EWG on Priorities propose to publish the complete National Registration Database in a non-changeable format. Member countries should store the entries into their Member database and update their Member database as requested. We kindly request your views on this proposal on the way forward.

³ ALINORM 04/27/24, paras. 196 – 201 and ALINORM 05/28/24, para. 128.

ANNEX

Instructions to get, fill and upload the spreadsheet (Excel file) on the Codex Website

1. Firstly please login with your credentials at: <http://www.fao.org/fao-who-codexalimentarius/login/en/>.
2. In the “MyCodex dashboard” page please click on the link “Upload of the Excel File on National Registrations of Pesticides”.
3. In the page “CCPR National Registrations Database” you can please download the XSL file to be filled in by clicking on “Please download the XLS file empty form here” and save the file locally.
4. Then please fill-in the Excel file you have saved locally. In the following section you will find the instructions to fill the tables on national registrations.
5. Once done, you can then follow again the steps #1 and #2 above and still in the “CCPR National Registrations Database” page you can now upload the filled-in Excel file by using the box “Upload of the Excel (XLS) File on national registrations of pesticides”.
6. On the same page you will be able to also see the history of your uploads.

Instructions to fill the tables on national registrations

Lines 1 to 4: Please do not change the content of these lines except to add the name of your country and the date you entered the data in the appropriate cells.

Columns A and B: These columns contain Codex Pesticide Number and the Pesticide Name. Please do not change these entries.

Column C: Please add a Y if your country has authorized the use for the active substance mentioned in column B in one or more primary crops that are used as food or feed. In Case of Yes fill in columns D to I as described below.

In case you have authorized uses in animal premises or for direct external treatment of animals please indicate the animals treated in Column J as described below.

Please add a N if your country has not authorized the use for the active substance mentioned in column B or if the authorized use for the active substance mentioned in column B is only for crops not used as food or feed or if the authorized use for the active substance mentioned in column B is only for emergency cases for a limited time. In this case, nothing should be filled in columns D to J.

Entries can only made in the cell beneath the name of the active substance and only Y and N are allowed.

Column D to I: In case you set a Y in column C please include all commodity/commodity groups for which a registered label exists in your country.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

Column D: Please insert all commodities/commodity groups for type 01 Fruits as re-adopted by Codex Alimentarius Commission in 2017.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

It is proposed to add the commodities in the following order.

- 001 Citrus fruits FC
- 002 Pome fruits FP
- 003 Stone fruits FS
- 004 Berries and other small fruits FB
- 005 Assorted tropical and sub-tropical fruits - edible peel FT
- 006 Assorted tropical and sub-tropical fruits - inedible peel FI

Column E: Please insert all commodities/commodity groups for type 02 Vegetables as adopted by Codex Alimentarius Commission in 2017.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

It is proposed to add the commodities in the following order.

- 009 Bulb vegetables VA
- 010 Brassica vegetables (except Brassica leafy vegetables) VB
- 011 Fruiting vegetables, Cucurbits VC
- 012 Fruiting vegetables, other than Cucurbits VO
- 013 Leafy vegetables (including Brassica leafy vegetables) VL
- 014 Legume vegetables VP
- 015 Pulses VD
- 016 Root and tuber vegetables VR
- 017 Stalk and stem vegetables VS
- 018 Edible fungi VF

Column F: Please insert all commodities/commodity groups for type 03 Grasses as adopted by Codex Alimentarius Commission in 2017.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

It is proposed to add the commodities in the following order.

- 020 Cereal grains GC
- 021 Grasses, for sugar or syrup production GS

Column G: Please insert all commodities/commodity groups for type 04 Nuts and seeds according to Codex Standard 1993.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

It is proposed to add the commodities in the following order.

- 022 Tree nuts
- 023 Oilseed
- 024 Seed for beverages and sweets

Column H: Please insert all commodities/commodity groups for type 05 Herbs and Spices according to Codex Standard 1993.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

It is proposed to add the commodities in the following order.

- 027 Herbs
- 028 Spices

Column I: Please insert all commodities/commodity groups for type 11 Primary feed commodities of plant origin according to Codex Standard 1993.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

It is proposed to add the commodities in the following order.

- 050 Legume animal feeds
- 051 Straw, fodder and forage of cereal grains and grasses (including buckwheat fodder) (forage)
- 051 Straw, fodder and forage of cereal grains and grasses (including buckwheat fodder) (straws and fodders dry)
- 052 Miscellaneous Fodder and Forage crops (forage)
- 052 Miscellaneous Fodder and Forage crops (fodder)

Column J: Only in the case of uses in animal premises or for direct external use on animals please insert all animals treated according to types 06 Mammalian products and 07 Poultry products based on Codex Standard 1993.

Please insert only one commodity or commodity group per cell and add additional lines whenever necessary.

Each cell has a drop down menu. Please choose an animal from this menu. The animals mentioned are those given in types 06 or 07 of the Classification.

Example 1: If a country has registered uses for a pesticide only on citrus fruits, apple, plum, lettuce, potato and mushroom, the required entries in the Columns D to J of the Table would be:

Column D, 01 Fruits

Citrus fruits
Apple
Plum

Column E, 02 Vegetables

Lettuce
Potato
Mushroom

All other columns are left empty.

Example 2: If a country has registered uses for mancozeb in potatoes and apples and propineb in apples, lettuce and rape the required entries in the Columns D to J of the Table would be:

Column D, 01 Fruits

Apple (c, p)

Column E, 02 Vegetables

Lettuce (p)
Potato (c)

Column G, 04 Nuts and seeds

Rape seed (p)

All other columns are left empty.

If necessary add remarks and useful links at the end of the table.

We kindly ask to fill both tables named "Member (2016)" and "Member (2017)" and to rename the tables by replacing the word "Member" by the name of your country.