

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 3, 4a, 4b, 5a, 5b, 6, 7(a), 7(b), 7(c), 7(e), 8, 9, 10

CRD17  
ORIGINAL LANGUAGE

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

50<sup>th</sup> Session

Haikou, P.R. China, 9-14 April 2018

#### Comments on Agenda Item 3, 4a, 4b, 5a, 5b, 6, 7(a), 7(b), 7(c), 7(e), 8, 9, 10, submitted by Ghana

Ghana appreciates the opportunity to submit comments at the forthcoming 50<sup>th</sup> Session of the Codex Committee on Pesticide Residues (CCPR)

#### **AGENDA ITEM 3: Matters referred to the Committee by the Codex Alimentarius Commission and/or its subsidiary bodies (CX/PR 18/50/2)**

**Comment:** We commend Chile for raising this important issue to the Commission for guidance, and welcomes further discussion on developing a guidance document to be presented to a suitable subsidiary body of the Commission. We look forward to the discussion paper to be developed by Chile based on the recommendation by the CAC40.

**Rationale:** Biopesticides, biofertilisers and biostimulants is an emerging issue and might become an area of future trade challenges due to divergent national legislation. This is especially due to the increasing use of these products to improve agricultural productivity.

#### **Matters arising from the 73rd Session of the Executive Committee**

**Comment:** Ghana supports a back-to-back meeting between CCPR and CCRVDF to encourage closer collaboration in setting MRLs for some compounds (example Abamectin) that are used as both Veterinary Drugs and Pesticides in foods.

**Rationale:** The back-to-back meeting will ensure harmonized conclusion for compounds used as both Veterinary Drugs and Pesticide Residues.

#### **AGENDA ITEM 4 (a): Matters of interest arising from FAO and WHO in addition to the 2017 JMPR activities (CX/PR 18/50/4)**

##### **Matters for action**

**Comment:** We appreciate the need to improve chronic dietary assessment for compounds used as both veterinary drugs and pesticides and notes the guidance provided by the JECFA and JMPR on this matter.

**Rationale:** Ghana recognises that scientific approaches are needed in this assessment process.

##### **Acute probabilistic dietary exposure assessment for pesticides**

**Comment:** Ghana admits that probabilistic modelling is used in refining acute dietary exposure assessment for pesticides and look forward to the report in 2019.

**Rationale:** This is in line with the ongoing work to review the IESTI equation.

##### **Global Food Consumption databases and ongoing activities to support countries to generate and to use data for risk analysis purposes.**

**Comment:** We welcome the FAO/WHO GIFT initiative to update individual quantitative food consumption surveys.

**Rationale:** There is need for the generation of individual consumption data and this will help address the need for global harmonization of food consumption.

#### **AGENDA ITEM 4 (b): Matters of interest arising from other international organizations (CX/PR 18/50/4)**

**Part 1: Activities of the Joint FAO/IAEA Division of Nuclear Techniques in Food and Agriculture relevant to CCPR Work.**

**Comment:** We appreciate the work of the Joint FAO/IAEA Division of Nuclear Techniques in Food and Agriculture in supporting developing countries in Africa, to strengthen analytical capacity to develop reliable methods for quantification and monitoring of contaminants.

**Rationale:** Ghana has benefited in the past from the various laboratory capacity building activities which has improved our analytical competence to undertake monitoring of food chemical contaminants.

#### **Part II: Update on OECD on Residue Chemistry and Pesticide Minor Use relevant to CCPR Work.**

**Comment:** Ghana welcomes the information sharing from the OECD activities to avoid duplication and overlaps between international groups.

**Rationale:** This is encouraged to support the global harmonization work on Pesticide Residue Chemistry and Minor Use.

### **AGENDA ITEM 5(a): Report on items of General Consideration by the 2017 JMPR**

#### **2.1 Special studies on microbial effects of pesticide residues in food:**

**Comment:** We welcome the new approach in evaluating intestinal microbiota given the emerging challenges with anti-microbial resistance which is a global challenge.

**Rationale:** Pesticide residues in food may have antimicrobial properties and there is potential exposure of intestinal microbiota following ingestion of such residues in food.

#### **2.3 Further consideration of the process for establishing group MRLs: Update on the use of the revised commodity classification for vegetables.**

**Comment:** Ghana believes that the use of Crop Grouping is very important in supporting the establishment and harmonization of missing MRLs for minor crops. We urged the committee to explore mechanisms to ensure that this does not set preference on earlier agreed areas of harmonization.

**Rationale:** Most of the exports from Africa are minor crops and it was envisaged that the crops grouping would address missing MRLs.

#### **2.5 Update of the IESTI model used for the calculation of dietary intake: New large portion data**

**Comment:** We welcome the updated model that has included more countries. However, we look forward to the inclusion of large portion data from Africa.

**Rationale:** The inclusion of wider submission of large portion data from most countries in the world, especially in Africa will improve on the uncertainty of the outcome of short-term dietary intake estimation.

### **AGENDA ITEM 5(b): Report on 2017 JMPR responses to specific concerns raised by CCPR**

#### **3.2.2.2 Harmonization of the dietary exposure methodologies for compounds used both as pesticides and veterinary drugs – Harmonizing/ combining exposure from veterinary drug and pesticide use**

**Comment:** We acknowledge the ongoing work by Agvet to harmonize dietary exposures methodologies for compounds used for both pesticide and veterinary drug. We await the outcome of this work.

**Rationale:** There are some discrepancies in the risk assessment approaches for the compounds used for both veterinary drug and pesticide. Hence there is need to develop harmonized model.

#### **3.2.2.5 Harmonization of the residue definition – determining the level of interest in a pilot project to achieve more harmonized residue definitions**

**Comment:** We agree with the suggestion to establish an active substance dialogue between national regulators and international organizations in order to come up with a non-binding harmonized residue definition. We support the establishment of a pilot project to expose this issue in future.

**Rationale:** Different residue definitions by national governments and international organizations normally results into different dietary exposure conclusions and enforcement requirement and hence there is need for harmonization.

### **AGENDA ITEM 6: Draft and proposed draft maximum residue limits for pesticides in food and feed at steps 7 and 4 (CX/PR 18/50/5)**

**Acetamiprid (246),**

**Comment:** Ghana has noted the observation by the JMPR.

**Rationale:** The Meeting could not estimate a maximum residue level, STMR or HR for acetamiprid in pistachio nuts because the supplied data did not match the GAP for pistachio nuts.

**Azoxystrobin (229),**

**Comment:** Ghana supports the proposed MRLs for the following commodities (Sugar cane). We therefore propose that, these draft MRL should be advanced to the next Codex step.

**Rationale:** The long and short term dietary exposure to residues of Azoxystrobin does not present any public health concern and therefore is unlikely to impede trade in the above commodities.

**Carbendazim (072),**

**Comment:** Ghana has noted the observation by the JMPR.

**Rationale:** The meeting was unable to complete its evaluation for residues.

**Difenoconazole (224),**

**Comment:** We support the proposed MRLs for the following commodities (Watermelon, Group of Fruiting vegetables other than cucurbits (except Peppers, Chili), Chili, Peppers, Chili, dried, Subgroup of dry beans (except soya bean), Subgroup of dry peas (includes all commodities in this subgroup), Rice, and Rice, polished,). Ghana therefore proposes that these draft MRLs should be advanced to the next Codex step and the withdrawal of the MRL for Fruiting vegetables other than cucurbits.

**Rationale:** The low percentage of ADI and ARfD, the long and short term dietary exposure to residues of difenoconazole is unlikely to pose a public health concern and impede trade in the above commodities.

**Foetal - Aluminium (302),**

**Comment:** Ghana supports the proposed MRLs for the following commodities (Avocado, Cucumber, Group of Pome fruits (includes all commodities in this group), Lettuce, Head, Lettuce, Leaf, Melon (except water melon), Peppers, Sweet, (including pimento or pimiento), Subgroup of Oranges, Sweet, Sour (includes all commodities in this subgroup), Summer squash, Tomato and Tree nuts (includes all commodities in this group). Ghana proposes that these draft MRLs should be advanced to the next Codex step.

**Rationale:** The long and short term dietary exposure to residues of fosetyl, phosphonic acid and their salts are unlikely to pose a public health concern and impede trade in the above commodities.

**Oxamyl (126)**

**Comment:** We support the proposed MRLs for the following commodities (Carrot, Cucumber, Eggplant (includes all commodities in this subgroup), Melons, except Watermelon, Peppers, Chili (dried), Potato, Squash, Summer, Subgroup of Eggplants (includes all commodities in this subgroup), Subgroup of Peppers (except Martynia, Okra and Roselle), Tomato and Watermelon). Ghana therefore proposes that these draft MRLs should be advanced to the next Codex step.

**Rationale:** The low percentage of ADI and ARfD, the long and short term dietary exposure to residues of Oxamyl is unlikely to pose a public health concern and impede trade in the above commodities.

**Phosphonic acid, (301),**

**Comment:** Ghana supports the proposed MRLs for the following commodities (Avocado, Cucumber, Group of Pome fruits (includes all commodities in this group), Lettuce, Head, Lettuce, Leaf, Melon (except water melon), Milks, Peppers, Sweet, (including pimento or pimiento), Subgroup of Oranges, Sweet, Sour (includes all commodities in this subgroup), Summer squash, Tomato and Tree nuts (includes all commodities in this group). Ghana therefore, proposes that these draft MRLs should be advanced to the next Codex step.

**Rationale:** The long and short term dietary exposure to residues of phosphonic acid and their salts are unlikely to pose a public health concern and impede trade in the above commodities.

**Picoxystrobin (258)**

**Comment:** Ghana supports the proposed MRLs for the following commodities (Maize and Subgroup of dry beans (includes all commodities in this subgroup). Ghana therefore proposes that, these draft MRLs should be advanced to the next Codex step.

**Rationale:** The low percentage of ADI and ARfD, the long and short term dietary exposure to residues of Picoxystrobin is unlikely to pose a public health concern and impede trade in the above commodities.

**Propiconazole (160)**

**Comment:** We support the proposed MRLs for the following commodities (Subgroup of Oranges, Sweet, Sour (including Orange-like hybrids), Subgroup of Lemons and Limes (including Citron) and Pineapple). Ghana therefore proposes that, these draft MRLs should be advanced to the next Codex step.

**Rationale:** The low percentage of ADI and ARfD, the long and short term dietary exposure to residues of Propiconazole is unlikely to pose a public health concern and impede trade in the above commodities.

**Spinetoram (233)**

**Comment:** Ghana supports the proposed MRLs for the following commodities (Avocado, Mango, Passion fruit, Subgroup of Fruiting, vegetables, Cucurbits - Cucumbers and Summer squashes (includes all commodities in this subgroup), Melons, except watermelon, Subgroup of Peppers (except Martynia, Okra and Roselle), Soya bean (dry), Potato, Peppers, Chili, dried, Husked rice, Maize). Ghana therefore proposes that, these draft MRLs should be advanced to the next Codex step.

**Rationale:** The low percentage of ADI, the long and short term dietary exposure to residues of Spinetoram is unlikely to pose a public health concern and impede trade in the above commodities.

**Tebuconazole (189)**

**Comment:** Ghana supports the proposed Subgroup MRL for Beans with pods (includes all commodities in this subgroup) and at the same time supports the withdrawal Common bean (pods and/or immature seeds) and therefore supports the proposed draft MRL should advance to the next step.

**Rationale:** The low percentage of ADI and ARfD, the long and short term dietary exposure to residues of Tebuconazole is unlikely to pose any consumer health risk and impede trade in the above commodities

**Thiophanate - Methyl (077)**

**Comment:** We note that new toxicological data on one of the major metabolite was required to inform a conclusive opinion during the evaluation of this compound and therefore looks forward to this work being concluded in future.

**Rationale:** The JMPR meeting did not receive any information on the toxicology of carbendazim (major toxicologically relevant metabolite of thiophanate -methyl) therefore, was unable to complete its evaluation for the residues.

**Trifloxystrobin (213)**

**Comment:** Ghana supports the proposed new MRLs Cabbage Head

**Rationale:** The long and short term dietary exposure to residues of Trifloxystrobin is unlikely to pose any consumer health risk and impede trade in the above commodities.

**AGENDA ITEM 7 (a): Type 04: Nuts, seeds and saps, Draft Group 022: Tree nuts (at Step 7), Draft Group 024: Seeds for beverages and sweets (at Step 7), Proposed draft Group 025: Tree saps (at Step 4) (CX/PR 18/50/6)**

**Comment:** Ghana commends the work of the EWG led by the USA and Netherlands on the revision of the Classification of food and feed.

Ghana accepts the work done so far but wishes to propose that the current scientific name for Code No. SO 0701: Shea nut is captured as *Vitellariaparadoxa* C. F. Gaertn instead of *Butyrospermumparadoxum* (Gaertn) Hepper.

**Rationale:** This is because it is the current and more acceptable name for the species.

**AGENDA ITEM 7 (b): Type 05: Herbs and Spices: Draft Group 027: Herbs (at Step 7) and Draft Group 028: Spices (at Step 7) (CX/PR 18/50/7)**

**Comment:** Ghana supports the recommendation of the EWG to forward the revised Type 05 Herbs and spices and the corresponding Table on examples of representative commodities for commodity groups for this Type 05 for final adoption by 41 CAC.

**Rationale:** The proposed revision by the EWG is consistent with the decision of the committee to include (a) a commodity only in one group or subgroup to avoid confusion of having two different CXLs for the same commodity; (b) the same commodity with different plant parts in different groups to allow consideration of plant parts when describing a commodity; (c) cross-referencing where commodities (without a code number) can be listed in a group, but with reference to its primary classification; and (d) the words “sub-group of” to the description of all subgroups to prevent misinterpretation between subgroups and individual commodities that share the same group. This will facilitate the establishment of MRLs for Herbs and spices and facilitate trade on these commodities most of which are minor crops

**AGENDA ITEM 7 (c): Impact of the revised commodity groups and subgroups in Type 03, Type 04 and Type 05 on the Codex MRLs (CXLs) adopted by the Codex Alimentarius Commission (CX/PR 18/50/8)**

**Comment:** Ghana supports the proposed changes for moving commodities within Type 03 from other groups i.e. Sweet corn (corn and the cob) Sweet corn (whole kernel) from the vegetable group to the cereal group to exclude both sweet corn from the new group CXL of cereals the, note, “excluding sweet corn” has to be added to code GC 0080 Group cereal grains and the code GC 0081 subgroup of cereal grains except pseudo cereals. At the same time the groups CXLs of the vegetable group and the sub group fruiting vegetables other than cucurbits has to be added to both sweet corns.

**Rationale:** This is in line with the decision of the 49<sup>th</sup> Session of CCPR that specific CXLs of the old group CXL for the relocated commodity will keep its existing CXL and at the same time the commodity will be excluded from the new group CXLs.

**AGENDA ITEM 7(e): Proposed draft tables on examples of representative commodities for commodity groups in Type 04, and Type 05 (for inclusion in the Principles and Guidance for the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Group (CX/PR 18/50/10)**

**Comment:** Ghana supports examples of selection of the following representative crops. The work being done on these groups, based on the similarities of plant morphology, crop production practices, growth habits and commodity potential for pesticide residues.

**Rationale:** This is because the proposed classifications adequately and fairly cover most of the crop species which are cultivated in the country for both export and local consumption. The selection of representative crops will facilitate the setting of group MRLs through extrapolation of the MRLs of the representative crops to the commodities in the group and/or subgroup

**AGENDA ITEM 8: Discussion paper on the review of the international estimate of short-term intake (IESTI) equations (CX/PR 18/50/12)**

**Comment:** Ghana commends the work of the EWG, chaired by the Netherlands and co-chaired by Australia and Uganda on the discussion paper on the review of the international estimate of short-term intake equations (IESTI). Ghana supports the recommendations of the eWG to establish an in-session WG to meet in the margins of the plenary meeting to discuss the various recommendations proposed by the group.

**Rationale:** The proposed recommendation will be made available as a Conference Room Documents at the session since it is not available.

**AGENDA ITEM 9: Establishment of Codex Schedules and Priority Lists of Pesticides (CX/PR 18/50/13)**

**Comment:** Ghana agrees with the Schedules and Priority lists of pesticides prepared by the EWG as provided in the tables in the working document for the 50<sup>th</sup> Session.

**Rationale:** Some of these compounds are registered in Ghana. Therefore, undertaking risk assessment and the establishment of MRLs will ensure public safety and facilitate trade in most of Pesticide/Food combinations

**AGENDA ITEM 10: Information on national registrations of pesticides (CX/PR 18/50/14)**

**Comment:** Ghana supports the ongoing work by the committee to gather information on national registration of pesticides on the codex pesticide list/list of commodities for which they are registered.

**Rationale:** The database will allow Ghana to upload updates and revisions to respective country-specific worksheets.