

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 12

CX/PR 21/52/16-Add.1

July 2021

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

52<sup>nd</sup> Session

(Virtual)

26-30 July and 3 August 2021

### ENGAGEMENT OF JMPR IN PARALLEL REVIEWS OF NEW COMPOUNDS:

#### PROPOSED PROCEDURES AND PRINCIPLES

*Comments of Australia, CropLife International, Cuba, Egypt, IFT, Japan, Thailand,  
The Philippines, United States of America*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/43-PR issued in May 2021. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific paragraphs.
2. The comments submitted through the OCS are, hereby attached as an Annex and are presented in table format.

**ANNEX****GENERAL COMMENTS**

1. **General Comments** on the (i) overall content and timeframes of the proposed approach (principles and procedures) to enable JMPR to engage in parallel reviews of new compounds as described in Sections 2-7 and (ii) whether the principles and procedures are robust enough to support the implementation of a pilot project on the understanding that the proposed process remains flexible for further improvements based on the experience gained with the pilot project (iii) the recommendation made in this regard (CX/PR 21/52/16, paragraph 28)

<b>COMMENTS/RATIONALE</b>	<b>MEMBER/OBSERVER</b>
Australia supports the proposals of the above-mentioned document and pilot going ahead and has no further comments on this occasion.	<b>Australia</b>
Cuba en principio apoya sin comentarios al respecto, el documento: PARTE I: Observaciones generales (véase el párrafo 3 de la carta circular CL 2021/43/OCS-PR).	<b>Cuba</b>
Egypt appreciates the approach taken by CCPR on this documents related to the engagement of the JMPR in parallel reviews of new compounds. In this regard, we would like to inform you that Egypt agrees on the above mentioned document with no comments.	<b>Egypt</b>
It should be emphasized that JMPR has already had heavy burden to evaluate new compounds, periodic reviews and new uses. If additional work was assigned to JMPR without increase of resources, it would result in decreasing the number of new compounds and/or new uses to be evaluated. Therefore, CCPR should first consider how to avoid undesirable consequences to delay establishment of MRLs on new compounds before proceeding the proposal.	<b>Japan</b>
The Philippines supports the Agenda Item 12 on the Engagement of JMPR in parallel reviews of new compounds: Procedures and Principles. The Philippines is agreeable to the proposed over-all content, timeframes, principles and procedures to be used by the JMPR. The Philippines recognized that significance of the results of the review which later on can be utilized by the national regulatory agencies depending on its applicability to the existing regulatory requirements.	<b>Philippines</b>
Thailand agrees with the procedures and principles for the engagement of JMPR in parallel reviews of new compounds in order to reduce trade barrier through established Codex MRL. Also, we agree with testing the procedure through a pilot project.	<b>Thailand</b>
The United States appreciates the efforts of the Electronic Working Group (EWG), chaired by Canada and co-chaired by Costa Rica and Kenya, to develop principles and procedures to facilitate participation of the United Nations Food and Agriculture Organization (FAO)/World Health Organization (WHO) Joint Expert Meeting on Pesticide Residues (JMPR) in the joint review of new compounds with national regulatory authorities. The discussion paper provides a strong starting point for this parallel review process and correctly highlights that further development of the process will require flexibility on the part of the Codex Committee on Pesticide Residues (CCPR) to address challenges collaboratively and to refine the process iteratively.  The United States does not have additional specific comments on the overall content and timeframes of the approach proposed by the EWG. The United States believes that the EWG appropriately incorporated feedback from Codex Members and Observers during the development of the EWG discussion paper and also sought guidance from the JMPR Secretariat on the proposed policies and procedures. Therefore, the United States believes that proposed principles and procedures will support the implementation of a pilot project with the understanding that the proposed process remains flexible for further improvements based on the experience gained with the pilot project. The United States looks forward to further discussion on potential pilot projects and to working collaboratively with Codex Members and Observers as the work on this important topic continues to progress.	<b>USA</b>

COMMENTS/RATIONALE	MEMBER/OBSERVER
For parallel reviews to be successful there needs to be a significant level of pragmatism employed by all people and organisations involved either directly or indirectly. Parallel reviews could quickly fail if the right mindset is not brought to the program. CropLife International welcomes all proposals to speed up the setting of CODEX MRLs and the harmonisation of human health guidance values, definition of residues and MRLs.	<b>CropLife International</b>
IFT recommends that the parallel review process would benefit from increased transparency when establishing MRL's, residue definitions, etc., Specifically, IFT requests that CODEX provide transparency in the form of a summary list of factors being used and also the rationale behind any differences in the parties' approaches. Additionally, it would be good to have the summary of the challenges noted by evaluators throughout the process. In this way, factors that are of a scientific nature where there is room for further discussion may be identified and addressed to promote harmonization of MRLs, etc.	<b>IFT</b>

### **SPECIFIC COMMENTS**

2. **Specific Comments** for further improvements may be provided, such as inclusion or removal of provisions, refinement of the current text, timelines, etc.

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p>A key output from the pilot will be to measure the impact on JMPR resources. The benefits will be easy to see, however the cost is less obvious. A parallel review will cross over two JMPRs and so will this mean a JMPR reviewer who may in normal circumstances over two years takes on two new active ingredients (AI) only be able to focus on this one new AI? Thus decreasing the output from JMPR.</p> <p>The success of previous (OECD) global joint reviews have largely coincided with having excellent project management in place. This will likely be seen again in parallel reviews.</p> <p>CropLife International would like to provide a comment on Section 8 - Conclusions paragraph 27 of document CX/PR 21/52/16 published on the CCPR-52 website.</p> <p>Paragraph 27 reads: "Should CCPR be agreeable to the pilot project, Canada as lead country of the EWG could coordinate with Australia as Chair of the EWG on Priorities, the JMPR Secretariat and other relevant stakeholders (e.g. CropLife) on the identification of a new compound and the timelines for the pilot project and to report back on their findings to CCPR53 (2022)." CropLife International would like to clarify that for competition reason, CropLife International cannot discuss identification of possible candidates for the pilot, however CropLife International can facilitate discussions directly with manufacturers/data sponsors. We therefore suggest to replace "(e.g. CropLife)" with "(e.g. manufacturers)".</p>	<b>CropLife International</b>