

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

Agenda Item 4.6

CAC/44 CRD/33

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-fourth Session

Comments of CropLife International

Agenda item 4.6: Codex Committee on Pesticide Residues

29 October 2021

CropLife International wishes to comment on the work of the Joint Meeting on Pesticide Residues (JMPR) and the Codex Committee on Pesticide Residues (CCPR). Whilst recognizing the context of the strategic challenges and opportunities to Codex presented by the global coronavirus pandemic, resulting in a significant backlog in the work of these two important bodies https://www.fao.org/fao-who-codexalimentarius/sh-proxy/it/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-701-44%252FWorking%252BDocuments%252Fcac44_08e.pdf, we wish to reiterate and build upon the points made in the Conference Room Document (CRD) provided by CropLife International ([CRD28](#)) to the 43rd Codex Alimentarius Commission meeting (CAC43), which focused on the need for CAC support for establishing an ambitious schedule of work for the JMPR and CCPR.

First, CropLife International would like to acknowledge and express our appreciation for the leadership of the Codex Secretariat in establishing the important precedent for Codex holding the CAC43 as a virtual meeting. This leadership continues with progressing the important work of the CAC44 – and the JMPR & CCPR52 - using modern communication tools; moving forward with improving this new way of working is reflected in multiple reports that will be considered in the CAC Executive Committee agenda (e.g., CCEXEC81 Item 5 Sub-committee on the Codex Strategic Plan 2020-2025, Item 8.4 Codex Trust Fund: lessons learned from the COVID-19 pandemic). Whilst we continue to see great value to in person meetings where necessary and appropriate, we believe that delivering two critically important goals of the Codex Strategic Plan 2020-2025, can only be achieved with increased use of modern communication tools for electronic data submissions, collaborative document creation and review:

- Goal 3 - Increase impact through the recognition and use of Codex standards, and
- Goal 5 - Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals.

Current Status JMPR / CCPR

As the CAC is aware CCPR and its scientific advice panel JMPR, are important bodies that contribute significantly to the delivery of the Codex Strategic Plan 2020-2025. CropLife International and its' members highly value work done by these bodies and strongly support the Codex Strategic Plan goals; CropLife International members are sponsors who voluntarily request nominations and supply the data / information to support the establishment of CODEX MRLs and do this because:

- CODEX MRLs (CXLs) support international trade and access to international markets for our grower customers, and

- establishment of science based MRLs by a credible international authority confirms the safety of the food supply moving in international trade.

Despite the work and best efforts of the WHO and FAO Secretariats and volunteer experts that comprise the JMPR, it is clear that the COVID-19 pandemic has adversely impacted JMPR resources and processes, leading to further backlog of CXLs being proposed for adoption. The [JMPR summary report](#) notes that while the virtual meeting format has certain advantages compared to in person meetings but that this comes at the expense of out: the virtual JMPR considered 15 compounds on the agenda where 12 detailed evaluations were conducted for residues, toxicology or both, while for comparison a typical JMPR agenda would have in the region of 35 agenda items on average, so a significant reduction on a typical JMPR agenda. In July 2021, CropLife International estimated a backlog of more than 1250 pesticide MRLs ([CRD11 for CCPR52](#)). Further, our analysis reported in our CCPR52 CRD11 reveals a growing gap between the time of the setting of national MRLs, and the adoption and publication by Codex of global standards (CXLs) for new compounds. These new compounds are developed based on state-of-the-art regulatory and other requirements and provide new tools for farmers in food production. They contribute to the adoption of Integrated Pest Management and other practices that will improve the sustainability and resilience of agriculture. In the absence of CXLs the use of these new compounds is often restricted by producers or other parts of the food and feed supply chain.

Additionally, CropLife International's reviewed recent historical averages for completion of JMPR reviews. This analysis reveals that, in order to complete the work plan approved by CCPR52 earlier in 2021, reduce the backlog of new compounds and new use and adjusted (Good Agricultural Practices (GAP) reviews, and to complete scheduled periodic reviews / re-evaluations **within 10 years**, the following work schedule would need to be carried out annually:

	Recent annual average	Needed annually to complete the workplan and reduce backlog
New active substance evaluations	8.4	10
New use and adjusted GAP reviews	20	30
Periodic Reviews	3.6	22

Conclusion and Proposals

CropLife International believes that our analysis of the current state and the impact of the COVID-19 pandemic leads to the conclusion that the resources and resourcing of JMPR and the processes / ways of working of the JMPR and CCPR are hampering achieving of the goals of the Codex Strategic Plan. We also believe that the outcomes of the 2021 JMPR meeting will result in a significant impact on the prioritization / work plan approved by the CCPR 52. Therefore, CropLife International requests that CAC44 and the Codex Secretariat carefully consider the impact of the existing backlog during their discussion and approval of the proposed JMPR / CCPR prioritization & work plan.

CropLife International and its' members also request the support and engagement of the Codex Secretariat, CAC representatives, and other stakeholders in a collaborative effort to identify and implement solutions to address the current backlog. CropLife International is currently considering establishing appropriate fora for stakeholder dialogue. CropLife International would like to discuss with stakeholders who are similarly concerned over backlog and would like to brainstorm on possible solutions and their implementation. CropLife International believes that a solution can only be found and implemented if all stakeholders work

together. CropLife International would like to invite all interested stakeholders to reach out to us. Likewise, CropLife International is interested to engage if such dialogues is facilitated by Codex or members. CropLife International would like to ask the members of CAC44 to support stakeholder dialogue.

In closing, we once again want to acknowledge our recognition and appreciation of the work of all involved, particularly of the FAO and WHO Secretariats, the JMPR experts, the CCPR, and the Codex Secretariat and the CAC, to deal with the challenges brought by the global pandemic. The leadership of the Codex Secretariat has been – and will be – critically important in dealing with the impacts of the COVID-19 and to continue to deliver on the strategic goals of the Codex program. We appreciate the consideration of our request for engagement and look forward to the input of the CAC on the opportunities outlined in this CRD.