

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 1, 7(a), 7(b), 7(c), 7(d), 10, 12

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

54th Session  
Beijing, P.R. China  
26 June - 1 July 2023

*Comments submitted by the United Republic of Tanzania*

The United Republic of Tanzania (URT) appreciates the opportunity to provide comments on the different agenda items to be discussed by the 54<sup>th</sup> of the Codex Committee on Pesticide Residues. The following are the comments from the URT for consideration.

#### Agenda Item 1

CX/CF 23/16/1

#### Adoption of Agenda

##### GENERAL COMMENT

The United Republic of Tanzania (URT) supports the adoption of the Provisional Agenda items as were circulated.

#### Agenda Item 7(a)

CX/PR 23/54/6

#### Class B – Primary Food Commodities of Animal Origin and Class E - Processed Foods of Animal Origin (All Types) (at Step 4)

##### GENERAL COMMENT

The URT would like to appreciate the Electronic Working Group chaired by the United States of America and co-chaired by the Netherlands for their good work. The URT agreed with the recommendations made by the EWG, however some comments for improvement have been made in the respective appendix.

##### SPECIFIC COMMENT

#### Appendix I Class B, Type 6; Mammalian products, Subgroup 033B Camelid milk

The URT recommends replacing the word “bacterian” with “Bactrian”

##### Justification

Wrong spelling.

#### Appendix I Class B, Type 9; Amphibians and Reptiles (Frogs, lizards, snakes and turtles)

The URT proposes to include the term “venom glands” in the exceptions under type 9, amphibians and reptiles, and the sentence to read, “The entire product, except the bones and the bony or horny outer shell (turtles) or venom glands, may be consumed. Portion of the commodity to which the MRL applies (and which is analysed): Whole commodity as marketed without bones or the outer shell or venom glands”

##### Justification

The venom glands are not edible.

**Appendix I Class E, Type 16; Secondary Food Commodities of Animal Origin, Group 081 Group Letter Code AD, page 58**

The URT recommends the editorial change for the word “commodities” to read “commodities” from code number “AD 3752 to AD 3756”.

**Justification**

Wrong spelling.

**Appendix I Class E, Type 16; Secondary invertebrate food commodities of animal origin, Group 083 Group Letter Code IV, page 59 and 61**

The URT recommends removing the sub group with code number “083F, Amphibians and reptiles, dried” from the group.

**Justification**

Amphibians and reptiles are not invertebrates.

**Agenda Item 7(b)****CX/PR 23/54/7****Tables on examples of representative commodities for commodity groups in different types under Class B and Class E (at Step 4) (for inclusion in the Principles and Guidance for the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Group (CXG 84- 2012))****GENERAL COMMENT**

The United Republic of Tanzania (URT) would like to thank the Electronic Working Group chaired by the United States of America and co-chaired by the Netherlands for their good work. The URT agreed with the recommendations made by the EWG, however some comments for improvement have been made in the respective appendices.

**SPECIFIC COMMENT****Groups 30 and 36, and from 30A to 30H Subgroups**

The URT proposes to remove the repetition of the word “muscle” under “Extrapolation to the following commodities” column.

**Justification**

For clarity. The word “muscle” is captured in the name for the groups or subgroups of muscle.

**Appendices I and II, where the word “camelid” appears**

The URT recommends replacing the word “bacterian” with “Bactrian”.

**Justification**

Wrong spelling.

**Groups 31 and 37, and from 31A to 31H Subgroups**

The URT proposes to remove the repetition of the word “fat” under the “Extrapolation to the following commodities” column.

**Justification**

For clarity. The word “fat” is captured in the name for the groups or subgroups of fats.

**Group 033 and subgroup 033F**

The URT proposes to remove the repetition of the word “milks” under the column “Extrapolation to the following commodities”

**Justification**

For clarity. The word “milks” is captured in the name for the groups or subgroups of milks.

**Group 039 Eggs**

The URT proposes to remove the repetition of the word “eggs” under the column “Extrapolation to the following commodities”.

**Justification**

For clarity. The word “eggs” is captured in the name for the group of eggs.

**Agenda Item 7(c)****CX/PR 23/54/8**

**Portion of the commodity to which the MRLs apply, and which is analyzed for Group 006 Assorted Tropical and Sub-tropical fruits - Inedible Peel and Group 023 Oilseeds**

**GENERAL COMMENT**

The URT appreciates the work done by the EWG chaired by the United States of America and co-chaired by the Netherlands.

The URT supports the recommendations made by EWG, that is, the changes to Classification of Food and Animal Feed (CXA 4-1989) for Group 006 – Assorted tropical and sub-tropical fruits (inedible peel) and Group 023 - Oilseeds and oil fruits, as shown in paragraph 11.

**Agenda Item 7(d)****CX/PR 23/54/9**

**Review the Guidelines on Portion of Commodities to which MRLs apply and which is analyzed (CXG 41-1993) with a comparison to the Classification of Food and Feed (CXA 4-1989)**

**GENERAL COMMENT**

The URT appreciates the work done by the EWG chaired by the United States of America and co-chaired by the Netherlands.

The URT supports the recommendations made by EWG, that is, the changes to Classification of Food and Animal Feed (CXA 4-1989) for Group 006 – Assorted tropical and sub-tropical fruits (inedible peel) and Group 023 - Oilseeds and oil fruits as shown in CX/PR 23/54/8, paragraph 11.

**Agenda Item 10****CX/CF 23/16/14**

**National registrations of pesticides**

**GENERAL COMMENT**

The URT appreciates the work done by the Electronic Working Group chaired by Germany and co-chaired by Australia and supports the recommendations made by EWG.

**Agenda Item 12****CX/PR 23/54/14**

**Monitoring the purity and stability of certified reference material of multi-class pesticides during prolonged storage**

**GENERAL COMMENT**

The United Republic of Tanzania (URT) would like to thank the Electronic Working Group chaired by India and co-chaired by Argentina and Iran for their good work. The URT agreed with the recommendations made by the EWG, however some comments for improvement have been made in the respective appendix.

**SPECIFIC COMMENT****Appendix III**

The URT proposes to introduce the section for “Introduction” on Appendix III “Guidance for monitoring the stability of reference material purity of pesticides during prolonged storage”. Most of the contents in paragraph 4 should be incorporated in the introduction.

**Justification**

To improve clarity and logical flow of the paper.

**Paragraph 4**

The URT proposes “paragraph 4” to read; “The laboratory should endeavour to maintain the RMs at storage conditions better than those recommended by the RMPs (e.g. temperature lower than recommended without exposure to light and moisture)”.

**Justification**

To improve clarity and logical flow of the paper to avoid theoretical presentation of the conditions.

**Paragraph 5**

The URT proposes the “paragraph 5” to read as; “To avoid the degradation of RMs, the vials must be placed in airtight capped tube/sealed pouch and immediately stored in the refrigerator at  $\leq -25^{\circ}\text{C}$ ”.

**Justification**

To improve clarity and logical flow of the paper to avoid theoretical presentation of the conditions.

**Section titled “ANALYTICAL PROTOCOL FOR DETERMINING THE PURITY OF REFERENCE MATERIALS”**

The URT proposes to add the word “stability” in the title to read “analytical protocol for determining the stability and purity of reference materials”.

The URT proposes to introduce a new paragraph under “Analytical protocol for determining the stability and purity of reference materials” to read; “If the deviation in the stability in terms of the certified property values mentioned in the certificate of analysis of the RM after expiration is found within ( $\leq \pm 10\%$ ), the analyte in the RM is acceptable and therefore be considered for continued use as a RM”.

**Justification**

Analytical protocol should consider both stability and purity of the RM.