

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 4(a), 6, 8

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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 Brazil

Agenda item 4a

CX/PR 23/54/3

Matters arising from FAO and WHO

Brazil would like to present the following text as a CRD regarding "Matters of interest arising from FAO and WHO", item 4(a)

We would like to express our concern and interest in environmental issues and also in the new challenges to advance in a sustainable agricultural production. In addition, we also understand the need for scientific support for the production of safe food, as it is extremely important to have a robust scientific basis for any measure that might restrict the distribution of food around the world. These measures may create unnecessary and unjustified barriers for the distribution of safe food and could potentially conflict with the objectives of CODEX Alimentarius so they are characterized as a setback for Sustainable Development Goals related to reduction of poverty and eradication of hunger.

In this sense, linking environmental issues to the MRL of some substances, without due scientific basis, capable of robustly proving a negative impact in the safety of food, is outside the mandate of the Codex Alimentarius, as defined in the General Principles of the Manual of Procedures. In our perspective, the initiative of bringing this issues to discussion in Codex Alimentarius is neither capable of protecting the health of consumers (making the food safer), nor able to guarantee fair practices in the international food trade.

Additionally, we foresee that unjustified restrictive measures will cause particularly negative impacts on developing countries, which would bear a greater burden in maintaining international trade with their partners due to increased production costs necessary to meet non-sanitary requirements. As a consequence, this kind of restrictions would compromise the wide distribution of food around the world.

As conclusion, Brazil supports that environmental issues are within the scope of other Bodies and in other forums, where we have the commitment to address these issues within the mandate of the organizations.

Agenda Item 6

CX/PR 23/54/5

MRLs for pesticides in food and feed (at Steps 7 and 4)

Brazil supports the MRL recommendations from JMPR 2022.

Additionally, Brazil kindly requests the advancement of the proposed MRL for triflumuron for soybean (0,1 mg/kg) to step 5/8 and the advancement of the proposed MRLs for mefentrifluconazole to step 5/8.

Agenda Item 8**CX/PR 23/54/10**

Brazil supports recommendations 1, 2 and 3 as proposed by the Joint EWG, adding, as for recommendation 2, that both JECFA and JMPR should take a more proactive role in asking the sponsors if they are willing to share their data upon submission of data packages.

Brazil supports revised recommendations 4 and 5 and suggests that, where it says that the EWG might consider the possibility of selecting the higher MRL value to be adopted, we could consider the possibility of CODEX adding a note on its MRL recommendation, displaying the original MRLs generated for each use, to help ensure good veterinary practices in the different member countries (establishment of withdrawal periods for each use).

Brazil agrees to task the Joint EWG with the additional task on harmonization of food descriptors to be used by JECFA and JMPR.