

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 items 3, 4a, 4b, 5a, 5b, 6, 7a, 7b, 7c, 7d, 8, 9, 10, 11, 12, 13

CRD34

June 2023

Original language only

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 Uganda

Agenda item 3

CX/PR 23/54/2

Matters referred to the Committee by the Codex Alimentarius Commission and/or its Subsidiary Bodies

Uganda appreciates CCPR and CAC for sharing information. Uganda would like to state that, as a country will follow the information mentioned.

Uganda will keep track of the events mentioned in the report and where need be Uganda would participate in the events.

Agenda item 4a

CX/PR 23/54/3

Matters arising from FAO and WHO

Uganda would like to thank FAO and WHO sharing this information.

Uganda appreciates the work being done under the one health frame which is through the FAO promotion of integrated pest management (IPM), biopesticides, agroecology and other green production practices to reduce reliance on chemical pesticide use and to reduce pesticide residues and risks to human health and the environment

Uganda also welcomes the work being done by the joint FAO/WHO International Food Safety Authorities Network (INFOSAN). Uganda looks forward to participating in any upcoming activities

Agenda item 4b

CX/PR 23/54/4

Matters arising from Other International Organisations activities of the joint FAO/IAEA Centre of Nuclear Techniques in Food and Agriculture relevant to CCPR

The Food and Agriculture Organization of the United Nations (FAO) and international Atomic Energy Agency (IAEA) Centre of Nuclear Techniques in Food and Agriculture work with Member Countries to promote food safety, consumer protection and facilitate trade.

Activities of relevance to the CCPR are being achieved through the Food Safety and Control Section and its laboratory, the Food Safety and Control Laboratory (FSCL) located in Seibersdorf, Austria. In collaboration with sister FAO Divisions in Rome, the support is delivered to member countries through technical cooperation projects (TCPs), coordinated research projects (CRPs) and additional extra-budgetary projects, as well as laboratory-led applied research and technology adaptation.

Uganda would like to welcome the report by the representative of IAEA. We want to thank IAEA for all the technical support it has been providing to most developing countries in strengthening both the human expertise and technical infrastructures of many analytical laboratories.

Agenda item 5a

Section 2 of the JMPR Report

Report on items of general consideration arising from the 2022 JMPR meeting

Uganda agrees with the report submitted by JMPR.

Justification:

JMPR is right to sight some of the challenges that Virtual meeting is not favourable when there is a need for in-depth scientific discussion.

Agenda item 5b

Section 3 of the JMPR Report

Report on responses to specific concerns raised by CCPR arising from the 2022 JMPR meeting

Uganda agrees with the observations cited in the report. Uganda, as a country will follow the information mentioned in report.

Uganda will keep track of the events mentioned in the report and where need Uganda would participate in the events.

Agenda item 6

CX/PR 54/23/5

MRLs for Pesticides in Food and Feed (at Steps 7 and 4)

During every session of CCPR as a standing agenda item JMPR secretariat submits the results of the evaluation of pesticide residues data and the proposed MRLs in food and feed for consideration by the session.

Uganda welcomes the report of the evaluation by JMPR and the specific comments on the proposed MRLs of individual compounds for the different food and feed items.

Agenda item 7a

CX/PR 54/23/6

Revision of the Classification of Food and Feed: Class B – Primary Food Commodities of Animal Origin and Class E - Processed Foods of Animal Origin (All Types) (at Step 4)

Uganda agrees with the observations cited in the report and supports the proposal for the adoption. Uganda, as a country will follow the information mentioned in report.

In addition, Uganda would like to recommend addition of some of the following:

- a) Under type 6 mammalian products group 30 subgroup 30A Bovine muscle:

Add Ankole cattle *watusi*

- b) Under type 6 mammalian products group 30 under subgroup 030D Cervine muscle

Add Antelope (*Antelope cervicapra*)

- c) Under Type 8 Aquatic Animal Products Group 40

Subgroup 040 F, various other, freshwater fishes.

- Silver Fish (*Lepisma Saccharinum*) and
- Dwarf Nile catfish (*Mochokus niloticus*)

- d) Appropriate placement is sought for:

Athi elephant-snout fish (*Mormyrus tenuirostris*), a species of ray-finned fish

Add under subgroup 040C

Lung fish (*protopetrus aethiopicus*)

Addition in Subgroup 40E Tilapias:

- Graham's tilapia (*Oreochromis esculentus*)
- Lake Magadi Tilapia (*Oreochromis grahami*)

We propose to move Nile perch (*lates niloticus*) under subgroup 041F to Subgroup 040D Perch and identify the appropriate code

Justification:

The animal commodities recommended are traded widely, thus they are widely exposed to pesticide residues in the environment hence there is need for the establishment maximum residual limits for these commodities.

Agenda item 7b

CX/PR 23/54/7

Revision of the Classification of Food and Feed: 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))

Uganda appreciates the EWG chaired by the USA and Co-chaired by the Netherlands for developing the document.

Uganda also support the proposed tables of representative commodities with the new commodities with the addition of the commodities mentioned under agenda item 7(a).

Justification:

The above-tables of representative commodities will allow for the extrapolation of group and subgroup MRLs within the groups and subgroup. This will help facilitate trade in these animal commodities.

Agenda item 7c

CX/PR 23/54/8

Revision of the Classification of Food and Feed: Portion of the commodity to which the MRLs apply, and which is analysed for Group 006 Assorted Tropical and Sub-tropical fruits - Inedible Peel and Group 023 Oilseeds

Uganda recognizes the concerns and the proposed changes by Ecuador for Group 006, to “whole product without the peel,” We therefore agree with the conclusion of the EWG that MRLs should reflect the whole commodity as it is traded.

Uganda is also in agreement with above proposed changes for Group 006 Assorted tropical and sub-tropical fruits – inedible peel and Group 023 Oilseeds and oil fruits

Justification:

The changes will likely result in significant changes in the existing MRLs for tropical fruits and subtropical fruits.

Agenda item 7d

CX/PR 23/54/9

Revision of the Classification of Food and Feed: Review the Guidelines on Portion of Commodities to which MRLs apply and which is analysed (CXG 41-1993) with a comparison to the Classification of Food and Feed

Uganda appreciates the Chair of the EWG the USA and the Co-Chair for guiding this discussion.

Uganda agrees that Classification of Food and Animal Feed (CXA 4-1989) should take precedence over Guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993) and that the changes to the Classification as indicated in CX/PR 23/54/8, paragraph 11, concerning Group 006 – Assorted tropical and sub-tropical fruits (inedible peel) and Group 023 Oilseeds and oil fruits should be implemented.

Uganda is also in agreement with the recommendation for the revocation of the Guidelines on portion of commodities to which MRLs apply and which analyzed (CXG-41-1993).

Justification:

The proposed changes were missing in the current version of CXG 41-1993.

Agenda item 8

CX/PR 23/54/10

Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF working group on compounds for dual use

Uganda provides comments to the questions provided by the Joint EWG below.

1. What work has been done cooperatively between CCRVDF and CCPR?
2. What are areas where CCRVDF and CCPR could collaborate in the future?
3. What mechanisms could be used to collaborate between CCRVDF and CCPR?
4. What mechanisms could be recommended to JMPR and JECFA to facilitate data sharing between the two risk assessments groups?
5. What are ways in which a new Joint EWG could identify and recommend adoption of single, harmonized MRLs for dual-use compounds that have different MRLs for the same edible commodity of animal origin?
6. Are there any additional topics affecting both CCPR and CCRVDF that have not been considered by either the draft discussion paper or questions?

Comments:

- Uganda supports the recommendations of the EWG and modifications proposed by CCRVDF26 to re-establish the EWG to address recommendations 4 and 5 above.

Justification:

The proposed mechanisms of cooperation between CCPR and CCRVDF will enhance work in cross-sectional issues.

Agenda item 9

CX/PR 23/54/11

Management of Unsupported Compounds without Public Health Concern Scheduled for Periodic Review

Uganda appreciates the Chair of the EWG Chile, and co-chaired by Australia, India, and Kenya for guiding the discussion.

Uganda would like to point out that more consideration need to be given to a balanced management approach in particularly with developing countries in particularly when determining when CXLs are retained, with the view of facilitating international trade while ensuring that the risk assessments are not based on obsolete chemistry, toxicology or Good Agricultural Practices (GAP) information. (REP21/PR, PARA 232)."

The working document also provides more detail on the proposed collaboration activities suggested last year. Uganda supports those including:

Providing capacity building activities to promote carrying out the necessary technical studies. These would include technical support to meet JMPR requirements for studies and formal procedures for data submission;

Greater efforts to clarify the work, namely: defining the scope of the problem with respect to the number of MRLs, identifying Members and Observers who are interested in specific compounds, and describing the data required for JMPR to conduct the periodic review; and

FAO and WHO providing information on what data are available and, more importantly, on what data are missing. This is necessary to define the workload for those who will provide the missing data.

Leveraging of national assessments to bridge any important data gaps identified by FAO/WHO.

Justification:

The draft discussion paper helps outline a proposed process that can be used to identify CXLs for compounds with no public health concerns that are unsupported but important to Codex's mission to protect consumer health while supporting fair trade practices.

Agenda item 10**CX/PR 23/54/12****National registrations of pesticides**

Uganda supports the ongoing work to continuously update the database. Uganda believes that the current update is appropriate enough to support the scheduling and prioritization of compounds due for periodic review.

Uganda is currently generating data on the various pesticides that can be included in the national registration.

Justification:

This is a very useful data resource that can be used to facilitate support of pesticides during periodic re-evaluation and determine the global registration status of unsupported compounds. Uganda is compiling data on pesticides that will be considered for registration in the national register.

Agenda item 11**CX/PR 23/54/13****Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR**

Uganda appreciates the Chair of the EWG Australia for guiding the discussion.

Uganda supports the proposed schedules and priority lists of pesticides provided in CL 2023/26-PR. Uganda would also like to recommend sponsor to support compound like Amitraz PHC and Fenthione. Uganda also recommends that the sponsors give special consideration for data support for compounds, which do not have public health concerns. Considering that, some of these compounds are still registered in most developing countries and therefore require MRLs.

Therefore, Uganda is in support of their submission for approval.

Justification:

For most of the compounds scheduled for 2024, these compounds are still registered in the national register thus need for them to have MRLs.

Amitraz PHC is registered in the region and is widely used as an acaricide for the control of ticks in cattle. Similarly Fenthion is registered and has been effective in the control of locusts.

Agenda item 12**CX/PR 23/54/14****Monitoring the purity and stability of certified reference material of multiclass pesticides during prolonged storage**

Uganda appreciates the Electronic Working Group chaired by India and co-chaired by Argentina and Iran for guiding the discussion.

Uganda is in support of the recommendations in the discussion paper on monitoring the purity and stability of certified reference material of multi-class pesticides during prolonged storage. Uganda is also in agreement that CRMs can continue to be used past their date of expiry as long as they meet quality criteria.

Uganda recommends forwarding the proposal for new work on this topic to CAC46 for approval. Uganda will participate in the electronic working group (EWG) once called upon.

Justification:

It has generally been confirmed through studies with proper storage conditions that most CRMs do comply with the requirement in the standards. Because of the high cost of purchasing CRMs the Continued use after expiry will help save cost for laboratory.

Agenda item 13**CX/PR 23/54/15****Enhancement of the operational procedures of CCPR and JMPR**

Uganda appreciates the Electronic Working Group chaired by the United States of America and co-chaired by Costa Rica, France, Germany, and Uganda) for guiding the discussion.

During CCPR53 (2022), Crop Life International raised a concern through a discussion paper (CX/PR 22/53/20) about backlog of evaluation at JMPR. This was attributed to the outbreak of COVID19 pandemic that resulted in the cancellation of the 2020 JMPR Regular Meeting. The discussion paper further highlighted that the current system in JMPR is unable to keep up with the demand for evaluations and made recommendations to CCPR53.

Based on the outcome of the discussion at CCPR53, an EWG was established, chaired by the United States and co-chaired by Costa Rica, France, Germany, and Uganda.

The terms of reference of the EWG were as follows:

Prepare a circular letter (CL) to request information from members and observers on the need to enhance CCPR/JMPR and the associated opportunities and challenges. In addition, the CL may invite members and observers to consider a second or possibly subsequent workshop that would expand on and further develop some of the themes addressed in the virtual workshop sponsored by CropLife International on March 31, 2022, as described in CX/PR 22/53/20.

Based on the responses to the CL, prepare a summary of the submitted information and a discussion paper that summarizes findings for consideration at CCPR54 and later transmission to JMPR.

Coordinate work with related EWGs such as the EWGs on priority lists, national registration database, and unsupported compounds,

Based on the above terms of reference, the EWG drafted CL 2022/75-PR and received input from fifteen Member Countries and three Observer Organizations. This feedback is summarized in discussion paper CX/PR 23/54/15 and highlights areas of consensus and divergent opinions on enhancements to the operational procedures of CCPR/JMPR.

The EWG concluded its work and is recommending a two-step approach for consideration by CCPR54

Step 1: Submit the EWG discussion paper to JMPR for their consideration to identify initial priorities for enhancing its operational procedures and to report back on its findings to the following session of CCPR.

Step2: CCPR will consider the reply from JMPR and based on consultation with the CCPR, Codex, and JMPR Secretariats, as well as FAO/WHO. CCPR and JMPR should develop an appropriate approach to identify potential priorities for enhancement and major structural reforms and develop a roadmap for implementation.

Uganda welcome the work of the EWG and thank the member countries and observers who participated in the process. Uganda also agrees with the proposed two-step as the way forward

Justification:

The proposed two steps will enable CCPR to consider feedback from JMPR and then develop a longer-term approach for identifying priorities and an implementation roadmap.