

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

CX/PR 23/54/10-Add.1

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

JOINT CCPR/CCRVDF WORKING GROUP ON COMPOUNDS FOR DUAL USE – STATUS OF WORK

Comments in reply to CL 2023/36-PR

*Comments of Canada, Chile, Egypt, Iraq, Kenya, Uruguay,
International Commission for Uniform Methods of Sugar Analysis (ICUMSA)*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/36-PR¹ issued in April 2023. Under the OCS, comments are compiled in general and specific comments.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

GENERAL AND SPECIFIC COMMENTS

COMMENT	MEMBER/OBSERVER
<ul style="list-style-type: none"> • Canada supports the on-going work of the Joint EWG. • Canada submits the following comments on the recommendations: <p>BACKGROUND</p> <ol style="list-style-type: none"> 1. The 25th session of the CCRVDF (CCRVDF25, 2021) sought advice from the CCEXEC on a mechanism for cooperation between CCPR and CCRVDF on the establishment of harmonized MRLs for compounds with dual use. 2. The 52nd Session of CCPR (CCPR52, 2021) also encouraged ways to facilitate and promote cooperation on cross-sectional issues between CCRVDF and CCPR. 3. The 53rd Session of CCPR (CCPR53, 2022) noted the information provided by the Chair of the Joint CCPR/CCRVDF EWG on the status of work under their mandate, supported the activities of the Joint EWG and encouraged members and observers to actively participate in the work of the Joint EWG. 4. The 81st Session of CCEXEC (CCEXEC81, 2021) recommended that CCRVDF and CCPR make use of a Joint EWG to further advance the work on cross-sectional issues between CCRVDF and CCPR to facilitate the establishment of single/harmonized MRLs for edible animal tissues for compounds with dual use. 5. Following the recommendation of CCEXEC81, the 44th Session of the Codex Alimentarius Commission (CAC44, 2021) agreed to establish a Joint CCPR/CCRVDF EWG chaired by the United States of America, open to all Members and observers working with the support of the Joint FAO/WHO Expert Committee on Food Additives (JECFA), the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) and the Codex Secretariat to address procedural and technical issues related to the establishment of harmonized MRLs for compounds with dual use. 6. Regarding the timeframe, the Joint EWG will continue its work as long as both CCRVDF and CCPR consider it useful. 7. The Joint EWG will not replace the ongoing parallel cooperation between the established EWGs under CCRVDF (edible offal) and CCPR (revision of the Classification) within their respective ToRs. 	Canada
<p>Whether the recommendations are agreeable as proposed by the Joint EWG and revised by CCRVDF26.</p> <p>Canada has no objections to the first three recommendations and the fourth revised recommendation listed in CL 2023/36-PR. However, for the revised recommendation 5, for dual use compounds that have diverging MRLs for the same edible commodity of animal origin, Canada is concerned with selecting the higher MRL value as the harmonized value without a thorough assessment of each JECFA/JMPR evaluation.</p> <ul style="list-style-type: none"> o The higher value may be based on older evaluations that considered outdated information or that were based on standards that no longer reflect current standards. o Canada recommends that the underlying JECFA/JMPR evaluations and risk assessments for each MRL be reviewed in greater detail and that harmonization be considered on a case-by-case, based on the most contemporary information. 	
<p>Whether the recommendations can be improved for completeness (please provide technical/substantive revisions only) based on the background information provided in paragraphs 8-25 of CX/PR 23/54/10. If so, please provide revised recommendation(s) in track change mode.</p> <p>Canada offers the following revision to the Revised Recommendation 5:</p>	

COMMENT	MEMBER/OBSERVER
<p><u>Revised Recommendation 5</u>: identify dual-use compounds that have different Codex MRLs for a similar edible commodity of animal origin and recommend on a case-by-case basis, a single, harmonized MRL(s) for the compound(s) and affected commodity(ies). The EWG might recommend that CCRVDF/CCPR consider selecting the higher MRL value, provided the higher MRL is based on contemporary toxicology data used to establish the HBGV, residue data used to conduct the exposure assessment and risk assessment methodologies.</p>	
<p>Whether there is room for additional recommendations based on the issues discussed in the Joint EWG as described in paragraphs 8-25 of CX/PR 23/54/10 and the discussions that took place at CCRVDF26 as reported in paragraphs 103-124 of REP23/RVDF26. If so, please provide additional recommendation(s).</p> <p>Canada has no further recommendations to suggest at this time considering the list of current recommendations is quite comprehensive. Canada acknowledges that the success of this initiative is contingent upon the willingness and ability of sponsors to share the confidential test data which formed the basis of the Codex MRLs for the dual-use compounds.</p>	
<p>Where there is agreement to task the Joint EWG with an additional task on harmonization of food descriptors to be used by JECFA and JMPR based on the discussions held at CCRVDF26 and the background information provided in paragraph 29 of CX/PR 23/54/10.</p> <p>Canada agrees with tasking the Joint EWG with considering the matter related to harmonized food descriptors to be used by JECFA and JMPR.</p>	
<p>Considerando que es relevante que el Codex avance en las recomendaciones formuladas por el Grupo de trabajo por medios electrónicos conjunto CCPR/CCRVDF, Chile apoya todas las recomendaciones realizadas, ya que facilitan la armonización y la aplicación de límites máximos de residuos (LMR) para los compuestos que se utilizan como plaguicidas y medicamentos veterinarios.</p>	Chile
<p>Egypt agrees on the proposed recommendations to CCPR & CCRVDF , and suggests that to write the recommendation (5) as mentioned in REP23/RVDF26 , clause no. 114 to include that " The working group might consider selecting the higher MRL value and recommending that JMPR/JECFA conduct a risk assessment using the higher value to determine its acceptability".</p>	Egypt
<p>Revised Recommendation 5: identify dual-use compounds that have different Codex MRLs for a similar edible commodity of animal origin and recommend on a case-by-case basis, a single, harmonized MRL(s) for the compound(s) and affected commodity(ies). The EWG might recommend that CCRVDF/CCPR consider selecting the higher MRL value.</p> <p>Rewrite the last sentence to be as follows "The working group might consider selecting the higher MRL value and recommending that JMPR/JECFA conduct a risk assessment using the higher value to determine its acceptability"</p>	
<p>Agree with no comments</p>	Iraq
<p>Kenya took the consideration the recommendations of Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF Working Group on Compounds for Dual Use – Status of work in CX/PR 23/54/10, and endorses them as recommendations to CAC46. Further, Kenya is in agreement with the proposals made by the Joint CCRVDF and CCPR EWG and revised by CCRVDF26.</p> <p><u>Justification</u>: Kenya takes cognizance of the amount of work done to harmonize MRLS of dual use compounds. Once harmonized duplication of work will be avoided in future.</p>	Kenya
<p>El GTe recomienda que el CCPR y el CCRVDF soliciten al JECFA y a la JMPR que continúen trabajando para armonizar sus metodologías de evaluación de riesgos, lo que incluye la forma de establecer valores de ingesta diaria admisible y LMR únicos y armonizados para los compuestos de doble uso. Se podría incluir además la exploración de la viabilidad de realizar una evaluación conjunta de compuestos de doble uso y el establecimiento de un GTe conjunto JMPR/JECFA. De acuerdo con recomendación presentadas por el EWG para su análisis por el CCPR y CCRVDF.</p>	Uruguay

COMMENT	MEMBER/OBSERVER
<p>El GTe recomienda que el CCPR y el CCRVDF pidan al JECFA y a la JMPR que estudien formas de compartir datos entre los dos comités de expertos, lo que podría incluir que el JECFA y la JMPR pidan a los patrocinadores que den su consentimiento para compartir los datos en el momento de la comunicación de los paquetes de datos.</p> <p>De acuerdo con recomendación presentadas por el EWG para su análisis por el CCPR y CCRVDF</p>	
<p>El GTe recomienda que el CCPR y el CCRVDF continúen prestando apoyo al actual GTe conjunto en la identificación y priorización de las cuestiones que afectan a ambos comités y aconsejen sobre el modo de abordar estas cuestiones y de informar a la Comisión del Codex Alimentarius en consecuencia.</p> <p>De acuerdo con recomendación presentadas por el EWG para su análisis por el CCPR y CCRVDF</p>	
<p>Recomendación 4 revisada: elaborar una lista de compuestos de doble uso como plaguicida y medicamento veterinario para los que no se haya establecido ningún LMR del Codex o solo uno, y que los países miembros proporcionen la información para completar dicha lista.</p> <p>Se adhiere a la “Recomendación 4 revisada” por el CCRVDF en su 26ª. Reunión. Se considera que los cambios realizados son adecuados. Así mismo el enfoque de separar el tratamiento de los plaguicidas de uso dual a los que no se les ha establecido LMR, o solo se ha fijado un LMR se considera pertinente. Se cree conveniente la elaboración de una lista en lugar de una base de datos que va a resultar más simple en su elaboración y permitiendo que los países miembros faciliten información a la misma.</p>	
<p>Recomendación 5 revisada: identificar los compuestos de doble uso que tienen diferentes LMR del Codex para un producto comestible de origen animal similar y recomendar, para cada caso en particular, uno o varios LMR únicos y armonizados para el compuesto o compuestos y el producto o productos afectados. El GTe podría recomendar que el CCRVDF/CCPR consideren la posibilidad de elegir el valor de LMR más alto.</p> <p>Con respecto a la “Recomendación 5 revisada”, surgen dudas sobre haber quitado de las recomendaciones que la JMPR/JECFA realice una evaluación de riesgos utilizando el valor más elevado para determinar su aceptabilidad. Se entiende que no sea posible realizarlo, pero se considera adecuado someter este cambio a una discusión más profunda en el ámbito del CCPR a fin de encontrar una solución que garantice que no habrá riesgos para la salud al usar el LMR más elevado.</p>	
<p>Encargar al GTe conjunto CCPR/CCRVDF que examine la cuestión relacionada con la armonización de los descriptores de alimentos que han de utilizar el JECFA y la JMPR.</p> <p>Se considera pertinente incorporar en el mandato del GTE conjunto CCPR/CCRVDF la armonización de los descriptores de alimentos que utilizarán el JECFA y la JMPR.</p>	
<p>It would also help to include some sort of acknowledgement that certain compounds may be classed as plant protection products but may have been applied as cleaning or disinfecting agents (e.g. chlorate).</p>	ICUMSA